



Mr Eoghan Murphy T.D.

Minister for Housing, Planning and Local Government

Custom House,

Dublin 1.

20th September 2018,

Dear Minister Murphy,

Dublin Chamber welcomes the draft Urban Development and Building Heights Guidelines. The Guidelines support the achievement of our vision for the Greater Dublin Area as a city well planned for the needs of a growing population, with sufficient and appropriate housing within the existing footprint of the city and within reach of efficient and effective public services and transport infrastructure. Critically, the Guidelines seek to prevent urban sprawl and to use available land effectively with a view to ensuring that the growing population of the city can be accommodated and served by high quality, affordable housing that reflects the changing needs of Dubliners.

The publication of these guidelines provide greater certainty for developers and planning authorities, whilst also giving local authorities sufficient flexibility to depart from existing local plans in order to meet requirements in density. The Guidelines acknowledge that “in some cases, statutory development plans have tended to set out overly restrictive maximum height limits in certain locations and crucially without the proper consideration of the wider planning potential”.

The Guidelines give very welcome precedence to the goal of meeting higher density commercial and housing needs in well serviced urban areas. The Guidelines will promote the creation of increased population densities in urban areas by affording the power to overrule local development plans including that which relates to building height and regulations, thus circumventing any local blockages and pushing forward National Planning Framework objectives for core density in urban regions (Special Planning Policy Requirement 3). However, the approval process itself for high density developments that utilize height needs further consideration. There needs to be further statutory responsibility for local authorities to approve such developments with a mechanism to prevent arbitrary blockages and rejections at a local level.

Making the best use of available land is crucially important to future planning. In the Greater Dublin Area, there are a number of brownfield/infill sites that are not currently being used to their best potential in the city. Developments along existing public transport infrastructure, along the Dart and LUAS lines in particular, should be prioritised. Special Planning Requirement 1 (SPPR) makes it a requirement for local authorities to identify areas where increased building height is to be actively pursued. Importantly, this SPPR also stipulates that there be no blanket limitations on height. It is important that strict geographical limitations do not adversely impact the application of the guidelines to suitable brownfield or other sites. Suitable brownfield sites around Bluebell and Inchicore, along the Naas dual carriageway and in the Cabra, Broombridge area, all outside of the guidelines' suggested 'canal ring' (1.10), are ideal for redevelopment.

There is also a need for transparency and clarity around the planning process for Strategic Development Zones (SDZ), particularly in the review stage. Any substantive change, as determined by An Bord Pleanála, requires the SDZ to go through a full statutory review and then go to final approval by the local authority, the process is lengthy and often lacking in transparency. A specific proposal from the Department of Housing, Planning and Local Government to target transparency, expediency, and approval of high density projects for SDZs would be welcome.

Developments with increased height in newly residential areas need to be near public transport links and amenities as well as designed for sustainability and to create a community. This need is considered and provided for in SPPR 2, where developments of increased building height must also be designed to create a sense of place through allowing for mixture of uses that amount to meet 'contemporary economic and social needs'.

In planning our cities and the State's capital in particular, the Guidelines' introduction of new set objectives for what is expected at a minimum from greenfield sites is crucial. SPPR 4

outlines minimum goals for residential capacity and demands mixed housing typology, excluding mono type residential areas of own door or two story homes only. This is a positive move for land management and meeting population needs. However, an addition to SPPR 4 for said developments to include a percentage of social and affordable housing would be advisable.

Increases in height can be achieved without greatly changing the overall character of Dublin. Some of the most successfully planned European cities serve as shining examples of this. Copenhagen has a core density twice that of Dublin but with building heights only one to two stories higher. Moreover, it has incorporated these building heights in a city with a focus on public realm and a sense of place, a key criterion of the draft Guidelines.

We are in favour of protecting the integrity of the Georgian core and would support the proposed guidelines to keep development at relevant scale of a city in architecturally sensitive areas. There are, however, areas of Dublin and within its existing footprint that are well suited to development with use of increased building height to achieve density.

While the principles of the Guidelines are a much welcome change in city planning, there is a clear need to determine how they are to be implemented and when they are to come into effect.

Kind regards,



Mary Rose Burke
CEO
Dublin Chamber