

Compact Sustainable Settlement Guidelines Consultation
National, Regional and Urban Planning Section
Department of Housing, Local Government and Heritage
Custom House
Dublin 1
D01 W6X0

27th April 2023

RE: Public Consultation on the Approach to Replacement of 'Sustainable Residential Development Guidelines' (2009)

To whom it concerns,

Cork Chamber represents 1,200 members employing over 100,000 people throughout the city, metropolitan area and county. Our vision is to be a world-leading Chamber of Commerce, delivering on a progressive economic, social and sustainability agenda at the heart of a vibrant business community. Our direction is guided by our formal pledge to uphold the United Nations Sustainable Development Goals.

On behalf of our membership, Cork Chamber welcomes this opportunity to contribute to the Public Consultation on the Approach to the Replacement of the Sustainable Residential Development Guidelines (2009). It is of particular importance to our members and indeed our city as it offers the opportunity to help meet our climate targets as we strive to become one of Europe's first 'climate neutral' cities by 2030. The proposed reforms also align closely with the National Sustainable Mobility Policy as well as a number of other national plans that aim to promote spatial development, regeneration and sustainability.

It is important to note that in order for the proposed changes in residential guidelines to affect real change and generate successful and sustainable neighbourhoods here in Cork, the delivery of key projects such as the Cork Metropolitan Area Transport Strategy and Bus Connects are crucial. This consultation offers the opportunity to consider changes that can deliver vibrant, well-connected and functioning areas that will increase the attractiveness of Cork as a place to work and live. We ask therefore that this submission is carefully considered, and we look forward to the outcome of this very important consultation that will shape our future communities.

Yours sincerely,



Conor Healy

CEO

This submission will offer views and observations on the three main areas of proposed reform; density, housing standards, and quality design and placemaking.

DENSITY

The ongoing shortages in the housing sector are without doubt negatively affecting Cork's attractiveness and the availability of housing continues to be a top concern for our members. Therefore, plans to expand the density ranges contained in the 2009 Guidelines are to be welcomed. In recent years Cork Chamber has called for the viable and adequate provision of housing close to the city centre to allow for compact growth, while working to address the issues that are hampering the delivery of apartments. Changing guidelines to increase dwelling densities in cities, towns and villages won't affect change if issues surrounding the viability and affordability of apartment building are not addressed. In 2021 Cork Chamber and the Construction Industry Federation (CIF) commissioned KPMG-Future Analytics to undertake research to identify solutions for issues around the viability of apartment development in Ireland. This resulting [report](#)¹ presents evidence-based recommendations for Government to consider when tackling these issues by means of alleviating the overall costs of new apartment construction and supporting the sustainable delivery of new apartment units.

While there has been some progress with affordable housing schemes and bodies given access to lower cost finance through government intervention and our proposals for a Vienna-style model to high density development being considered by the Land Development Agency, much more needs to be done. Time-bound tax-based incentives are needed along with a range of other measures to get the high-density housing developments we need built, especially on brownfield sites in the city. These kinds of measures have been used effectively across Europe to deliver housing, including in the UK where brownfield high-density developments are zero-rated for VAT. The Government's latest measures to increase housing supply fail to address challenges businesses are facing and a large cohort of the working population will still remain locked out of the housing market. These issues must be resolved if increasing dwelling densities is to have the desired impact on the current housing crisis. Cork Chamber has once again renewed its previous calls for targeted and time bound tax-based interventions to stimulate immediate change and get high-density developments off the ground, especially on brownfield sites².

It is also crucial that increases in dwelling densities do not have implications for the historic value of an area. It is intended that decision makers will need to make a judgement in relation to the suitability of a proposed development having regard to the receiving context and the need to protect the character and amenities of an area. Consultation with local residents and businesses in advance of any development will be of great importance to ensure future high-density developments are well received within the area and the business community. Therefore, provision should be contained within any guidelines for full consultation with local communities in advance of the higher density developments within areas. Equally, where a high density development is planned in an area in need of rejuvenation, it must seek to improve the area and create character. This principle is applied in London, an area where high density dwellings are in abundance. A report commissioned for the Greater London Authority in 2016 highlighted the importance of new housing development taking account of its physical context and local character³.

¹ www.corkchamber.ie/wp-content/uploads/2022/03/Apartment-Viability-Report-FINAL-13-July-2021.pdf

² <https://chamber.corkchamber.ie/news/details/news-release-26-04-2023>

³ www.london.gov.uk/sites/default/files/project_2_3_lessons_from_higher_density_development.pdf

HOUSING STANDARDS

By 2040, it is projected that Ireland's population will increase by one million people and without doubt a new approach to residential building is needed to facilitate compact growth in a manner that aligns with the *National Planning Framework* and also the *Housing For All* priorities. The proposed policy approach places emphasis on low-rise medium density housing models commonly seen in the UK and in Europe. Key design principles include reduced plot sizes, narrower streets, reduced car parking and the distribution of private open space in the form of patios and upper-level terraces and balconies accompanied with attractive streets and open spaces.

While Cork Chamber welcomes the emphasis on attractive streets and open spaces, any plans associated with new developments should take every opportunity to create credible space for biodiversity. There is a real opportunity here to develop smart houses with a focus on water security to promote greener cities. Blue-green roofs, as seen in Amsterdam, catch rainwater and store it to reuse in times of drought while also boosting city biodiversity by attracting insects and birds⁴.

It is imperative that increases in dwelling densities, via compact growth, and improvements in public transport come on stream simultaneously. The proposed policy approach recommends a graduated approach to the management of car parking within new residential developments based on access to public transport, walking and cycling. Urgent delivery of crucial projects like the Cork Metropolitan Area Transport Strategy (CMATS) and the associated Bus Connects programme are key to ensure the correct support is in place for high-density delivery in the city. The delivery of these projects would allow for the reduction and removal of car parking spaces from residential development plans as reliable alternatives would be available. Equally it would be a missed opportunity to exclude certain areas from higher density plans due to a lack of public transport options, making it even more important that these projects come to fruition as soon as possible.

It is of paramount importance that a minimum level of service exists within a 1km radius of any planned high-density development, and that barriers to filtered permeability⁵ i.e., walking and cycling are removed. Boundary walls around estates, cul de sacs, poorly designed linkages and connections which require much longer travel distances than direct linkages are all barriers to the walking experience as part of a daily commute and must be avoided at design phase to ensure the success of high-density developments.

QUALITY DESIGN AND PLACEMAKING

To achieve density in a manner that enhances an area quality design and placemaking must be considered in the preparation and consideration of individual planning applications for higher density dwellings.

Supporting the efficient and mixed use of land with a focus on urban centres can achieve higher development density that can thrive with services in walkable places. These areas can provide a movement network that fosters an environment capable of promoting active travel and different forms of public transport. Reducing traffic congestion and the associated carbon emissions are

⁴ <https://www.weforum.org/videos/these-ingenious-smart-roofs-in-amsterdam-catch-rainwater>

⁵ https://www.nationaltransport.ie/wp-content/uploads/2011/12/NTA_Permeability_Report_-_Web.08.20151.pdf

among the many benefits of quality design in urban centres. Brownfield sites are ideal locations to which these proposed guidelines could be applied. Many of these sites in Cork city can support compact growth due to their location, equally compact growth can bring vibrancy to these areas. Any approach to changing residential guidelines must also cater for a mix of dwelling types that facilitate different demographics including an aging population who play an important role in society and some of whom rely on proximity to key services that are fully permeable for walking as well as mixed mode commuting.

Healthy placemaking should seek to protect the unique identity of an area while improving the quality of life for those who call it home. There are ample examples of how this can be achieved here in Cork. For instance, the pedestrianisation of some streets would have a huge impact in areas where high density dwellings are being planned. The benefits of pedestrianisation have been well documented in Cork city on the likes of Princes St where outdoor dining has provided a huge boost for traders and the general public as well as increasing the attractiveness of the area.

The provision of high quality public realm that is accessible and provides key services such as lighting is central to any discussion around residential development as it is an important part of daily life and can be the key to a successful and sustainable neighbourhood. A focus on green spaces, parks, playgrounds and outdoor furniture should also be a central component of residential guidelines. Cork city is already leading the way in this regard with plans to enhance various parts of the city such as the Beamish Crawford Quarter.

Conclusion

Plans by the Minister to replace the Sustainable Residential Development Guidelines (2009) offer a real opportunity to distinguish our country and our region by delivering sustainable housing in a compact manner that will directly influence job growth, accelerate modal shift and enhance our built environment and infrastructure. The changing of these guidelines will have far reaching consequences and knock on effects while also contributing to climate action as we journey towards 2030 with hope that we will become one of Europe's first climate neutral cities here on Leaside. As exemplified in this submission there are a number of challenges and obstacles that have to be overcome if Cork is to benefit from proposed changes to these guidelines. It is more important now more than ever before that our city has a high quality, reliable movement network and that issues surrounding the viability and affordability of apartments are solved.

We look forward to the outcome of this process and we thank you for your consideration of the views and observations laid out in this submission.