



## Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

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### **Sustainable and Compact Settlements Guidelines for Planning Authorities Draft for Consultation, August 2023**

The Assembly acknowledges the publication of the draft Sustainable and Compact Settlements Guidelines for Planning Authorities, as prepared by the Department of Housing, Local Government and Heritage (DHLGH). It is intended that the proposed new ministerial guidelines will replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009).

The draft Guidelines set out policy and guidance in relation to the planning and sustainable development of urban and rural settlements, with a focus on residential development and the creation of sustainable and compact settlements.

This submission has been prepared by the executive of the Regional Assembly and approved by the Cathaoirleach of the Eastern and Midland Regional Assembly.

#### **1.0 Regional Spatial & Economic Strategy (RSES) for the Eastern and Midland Region 2019 - 2031**

The RSES supports the spatial, economic and climate policies of the Government by providing a long-term strategic planning and economic framework for the Eastern and Midland Region. The RSES also sets the context for local authorities within the Region to develop their city and county development plans in a manner to ensure national, regional and local plans align.

The Eastern and Midland Region contains some of the fastest growing communities in the Country, with a significant demand for housing to meet the needs of the growing population. At the core of the RSES is the consideration of a settlement hierarchy for the Region, which is informed by a number of key Regional Strategic Outcomes (RSOs) such as the provision of sustainable settlement patterns, compact growth, sustainable rural development, integrated transport and land use, sustainable management of environmental resources, enhanced regional connectivity and enhanced green infrastructure. The Settlement Strategy is concerned with the delivery of sustainable compact growth within the Dublin Metropolitan Area Strategic Plan (MASP) region, targeting growth within Regional Growth Centres and developing a network of Key Towns throughout the Region. The Settlement Strategy includes delivery of compact growth and urban regeneration including measures to achieve the provision of housing and supporting infrastructure to enable the population growth identified as part of the RSES and NPF urban development targets. Regional Policy Objective (RPO) 3.2 of the RSES outlines that local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new home within or contiguous to the built-up area of Dublin city and suburbs and a target of at least 30%

for other urban areas.

The overall vision of the RSES is to create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunity. The RSES vision is supported by 16 Regional Strategic Outcomes (RSOs) that are framed around three key principles of Healthy Placemaking, Climate Action and Economic Opportunity. In particular, RSO 1 and RSO 2 are noted as follows;

1. Sustainable Settlement Patterns

*Better manage the sustainable and compact growth of Dublin as a city of international scale and develop Athlone, Dundalk, Drogheda and a number of key complementary growth settlements of sufficient scale to be drivers of regional growth. (NSO 1, 7, 10)*

2. Compact Growth and Urban Regeneration

*Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens. (NSO 1)*

A key focus of the RSES is the need to achieve ambitious targets for compact growth in urban areas, to improve liveability and quality of life, enabling greater densities to be achieved. Urban regeneration and infill sites can contribute to sustainable compact growth and revitalisation of existing settlements of all scales which will help to address National Policy Objective 3a, 3b and 3c of the NPF, targeting the delivery of new homes within the footprint of existing settlements.

In accordance with the Planning and Development Act 2000 (as amended), the Regional Assembly has reviewed and made submissions to all city and county development plans within the Region to ensure consistency with the RSES, and by default the National Planning Framework, to ensure population targets and housing figures contained within each development plan are aligned to the RSES. It is noted that the continued roll out of local area plans across the Regions are the next step in achieving the objectives of the RSES and Project Ireland 2040 with ongoing engagement with local authorities in the Region in relation to same.

## 2.0 Submission

Having considered the new draft Guidelines, this submission outlines the observations of the Regional Assembly on the overall content of same.

The draft Guidelines provide a review and update of the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009). The draft document is divided into five chapters covering the following topics;

- Chapter 1: Introduction and Context
- Chapter 2: Implementation
- Chapter 3: Settlement, Place and Density
- Chapter 4: Quality Design and Placemaking
- Chapter 5: Development Standards for Housing

These are discussed further in the following sections of this submission.

## 2.1 Introduction and Context

The Regional Assembly notes the content of Chapter 1 of the draft Guidelines which sets out the legislative context since the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009) were published. This includes the publication by the Government of the National Planning Framework (NPF) in 2018 which is a high-level strategy for the strategic planning and growth of Ireland over the next 20 years, with an expected increase of around one million people above 2016 levels by 2040.

The strategy of the NPF to accommodate this growth in a sustainable way focuses on 10 National Strategic Outcomes (NSOs) that include compact growth, sustainable mobility, enhanced amenity and heritage, a low carbon and climate resilient society and the sustainable management of water, waste and environmental resources.

The ambitions of the strategy are to accommodate growth to 2040 under three spatial headings;

- Regional Balance: Achieve more regionally balanced population growth, split roughly 50:50 between the Eastern and Midland Region and the rest of the Country.
- City and Regional Growth Drivers: To underpin regional balance, target of 50% of population growth into the five cities of Dublin, Cork, Limerick, Galway and Waterford, with the balance of growth targeted throughout the Country. The strategy supports the future growth of Dublin as Ireland's leading global city of scale. It also sets ambitious growth targets for the four cities of Cork, Limerick, Galway and Waterford.
- Compact Urban Growth: Target of 50% of new housing growth in the five cities within the existing built-up footprint, on infill or brownfield lands. Target 30% of new housing growth in all other settlements, within the existing built-up footprint, on infill and brownfield lands.

It should be noted that the above NPF principles were incorporated into the overall Growth Strategy contained in Chapter 3 of the Regional Spatial and Economic Strategy (RSES) 2019-2031 for the Eastern and Midland Region.

This chapter of the draft Guidelines also outlines the priorities to achieve compact growth by focusing on the renewal of existing settlements rather than measures that promote continued sprawl or dispersed settlement patterns which creates a demand for travel, and carbon intensive travel. The draft Guidelines promote the concept of the 15-minute city, which should be the overarching objective when planning sustainable and compact settlements. It states that planning authorities at settlement level should plan for an integrated network of neighbourhoods that can meet day-to-day needs (such as food, healthcare, education and sports) within a short 10-to-15minute walk of homes. In the case of larger settlements, the residents of less central neighbourhoods should have the opportunities to travel by public transport and other sustainable modes to access higher order services, employment and amenities.

It is considered that the above concept supports and is supported by, the growth strategy set out in the current RSES for the Eastern and Midland Region whereby RPO 3.2 requires local authorities in their core strategies to set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin city and suburbs and a target of at least 30% for other urban areas. Furthermore, RPO 3.3 requires local authorities in their core strategies to identify regeneration areas within existing urban settlements and outline specific objectives for the delivery of urban infill lands to provide for increased densities in line with government policy.

Section 1.3.2 of the draft Guidelines outlines that to achieve compact growth, there is a need to support more intensive use of existing buildings and properties, previously developed land and infill sites in the built-up

areas of existing settlements in addition to the development of sites in locations served by existing facilities and public transport.

The draft Guidelines provide further commentary on measures that support the implementation of compact growth measures including the Urban Regeneration and Development Fund (URDF), the Rural Regeneration and Development Fund (RRDF) and the Town Centre First Policy. The draft Guidelines also refer to other government policies such as Housing for All (2021), the Climate Action Plan 2023 (CAP 23) and the National Sustainable Mobility Policy (2022) that are taken into consideration in the preparation of the draft Guidelines.

In terms of land activation, the Residential Zoned Land Tax (RZLT) will come into effect in 2024 to encourage the activation of suitably zoned and serviced land for housing along with other initiatives under consideration including Land Value Sharing and the introduction of Urban Development Zones (UDZs).

It is stated that in addition to these initiatives, it will be necessary to increase the number of people and the scale of buildings in all parts of our cities and towns, with highest densities at the most central and accessible urban locations, particularly city centres and close to public transport nodes and interchanges.

The Regional Assembly welcomes the content of this chapter which is supported by the aims and objectives in the RSES (2019-2031) for the Region with the overarching aim to provide more compact settlement structures in order to achieve National Strategic Outcome (NSO 1) in the NPF and Regional Strategic Outcome (RSO 2) in the RSES, including the development of strategic brownfield land and infill sites to be set out in core strategies of each local authority.

The growth strategy contained in the RSES includes a number of growth enablers for Dublin City and the Metropolitan Area (Dublin MASP), the Dublin-Belfast Economic Corridor (including the requirement for compact and focused growth in the Regional Growth Centres of Drogheda and Dundalk), the Core Region including the mid-east counties of Louth, Meath, Kildare and Wicklow and the Gateway Region in the midlands and border areas including the focus for development in the Regional Growth Centres of Athlone and Dundalk.

The Settlement Strategy of the RSES also includes growth enabler guidance for local authorities in preparing their core strategies that complements the focus in the draft Guidelines for compact settlement structures including the requirement to promote sustainable growth in the right locations and 'catch up' investment and consolidation in local services, amenities and employment in areas that have experienced large-scale commuter driven housing development.

## **2.2 Implementation**

Chapter 2 of the draft Guidelines provides an outline of the legislative background for the implementation of the new guidelines including current provisions under the Planning and Development Act 2000 (as amended). It states all individual planning applications and appeals that include a residential element should be considered having regard to the policies and objectives set out in these guidelines. In the transitional period prior to the review of a statutory development plan to comply with the Guidelines, the planning authority must apply the SPPRs in the Guidelines where a proposed development would not contravene materially an objective of the development plan or local area plan concerned. In circumstances where a material contravention of an objective of the development plan or local area plan would arise, permission may be granted in accordance with the provisions set out under Section 34(4) of the Act, where the decision maker is a planning authority, and Section 37(2) of the Act in the case of An Bord Pleanála.

The draft Guidelines also reference other Section 28 guidelines that should be considered in combination with the draft Guidelines where there is overlapping policy and guidance, including Development Plans Guidelines

for Planning Authorities (2022), Sustainable Urban Housing Design Standards for New Apartment Guidelines for Planning Authorities (2022), The Urban Development and Building Height Guidelines for Planning Authorities (2018) and Local Area Plan Guidelines for Planning Authorities (2013).

The Assembly considers that the inclusion of these provisions within the draft Guidelines, particularly those at 2.1.2 and 2.2, provide some clarity to the point raised in the previous submission of the Regional Assembly with regard to existing core strategies, including land allocation and density provisions in existing city and county development plans (and associated land use zoning maps) and how this relates to the draft Guidelines.

### 2.3 Settlement, Place and Density

Chapter 3 of the draft Guidelines sets out policy and guidance in relation to the growth priorities for settlements at each tier in the national settlement hierarchy and in relation to residential density. The new guidance builds on the approach of the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009) to promote increased residential densities in appropriate locations including in city and larger town centres. The 2009 Guidelines promoted a three-tiered approach to residential density with densities up to 35 dwellings per hectare (dph) in smaller towns and villages, densities of 35 to 50 dph in outer suburban and greenfield areas of cities and large towns, and densities of 50 dph + in more central urban locations and close to public transport.

It is noted that the draft Guidelines build on the NPF's priorities for compact growth and set out an expansion on the number of density bands contained in the 2009 Guidelines in order to ensure that densities are efficient and also tailored to the settlement context.

Section 3.2.1 of the draft Guidelines sets out the methodology planning authorities should take into account in transposing national planning policy in relation to residential density into statutory development plans and in the assessment of planning applications. This includes consideration of the following;

- (a) Identify the relevant settlement category based on the categories described in Section 3.2.2 of the Guidelines, which includes cities, Regional Growth Centres and Key Towns, which supports and aligns with the settlement types in the RSES,
- (b) Identify the relevant area type based on the area descriptions detailed in Sections 3.2.2 (e.g. central, urban, suburban or edge) and,
- (c) Identify the recommended density range for that area type.

Following this, the decision maker(s) will need to determine the appropriate density range(s) for the area or site generally within the ranges set out in Section 3.2.2 and refined in accordance with the guidance set out in Section 3.3. It may be necessary and appropriate in some circumstances to permit densities that are above or below the ranges set out in Section 3.2.2. In such circumstances, the planning authority should clearly detail the reason(s) for the deviation, based on considerations relating to the proper planning and sustainable development of the area.

In the preparation of a core strategy, planning authorities will need to take account of both gross and net densities when calculating land requirements. The draft Guidelines state that the general rule of thumb is that the net site area would be between 65 to 80 percent (approx.) of the gross area, with Appendix B providing more guidance on this issue.

It is noted that in Section 3.2.2 of the draft Guidelines, detailed commentary is provided on appropriate densities for five cities outlined in the NPF with a notable difference between densities applicable to Dublin and Cork, to the remaining cities of Limerick, Galway and Waterford.

Within the Eastern and Midland Region, Dublin has been identified as having the following density ranges;

- City Centre Area: 100 to 300 dph (net)
- City Urban Neighbourhoods (Including Designated Town Centres and Public Transport Nodes & Interchanges): 50 to 250 dph (net)
- City Suburban/Urban Extension: 40 to 80 dph (net) shall generally be applied at suburban and urban extension locations and densities of up to 150 dph (net) shall be open for consideration at accessible urban locations.
- Metropolitan Town: 40 to 100 dph (net) generally applied in metropolitan town centres and on lands around existing or planned high-capacity public transport node or interchange. In addition, densities of 35-50 dph (net) generally applied at suburban and edge locations.
- Metropolitan Villages: These are generally small in scale and have limited infrastructure and service provision. Population growth in such villages should be limited and tailored to reflect existing density and/or built form.

Section 3.2.2.2 of the draft Guidelines sets out the proposed density ranges for Regional Growth Centres, Key Towns and Large Towns (10,000+ Population).

Within the Region, there are three Regional Growth Centres (Athlone, Drogheda and Dundalk) and eleven Key Towns that fall under this category.

- For Large Town Centres and Urban Neighbourhoods, the suggested density range is 40 to 150 dph (net)
- For the Large Town Suburban/Urban Expansion: For these areas the suggested range is 30 dph to 50 dph (net) and densities of up to 80 dph (net) shall be open for consideration at accessible urban locations.

Section 3.2.2.3 of the draft Guidelines sets out the proposed density ranges for small and medium towns (>1,500 – 10,000 population). It states that given the range of settlement types in this tier, planning authorities as part of the statutory plan-making process need to refine density standards set out in Table 3.6 of the guidelines to respond to local circumstances. A flexible approach is suggested to applying appropriate densities in the town centre area of such settlements based on scale, form and character of existing development and service and infrastructure capacity, with densities in the range of 25 to 40 dph (net) generally applied at the edge of such small to medium sized towns.

Section 3.2.2.4 of the draft Guidelines sets out the proposed density strategy for rural towns and villages (<1,500). It is stated that such settlements are not identified for significant population growth under the NPF and should grow at a limited pace that is appropriate to the service and employment function of the settlement. Planning authorities should look to promote and support housing that would offer an alternative to persons who might otherwise construct rural one-off housing in the surrounding countryside in rural towns and villages.

Table 3.6 of the draft Guidelines provides a useful summary of the applicable density ranges for cities, MASP towns, Regional Growth Centres/Key Towns/large towns, small to medium sized towns and rural towns/villages.

In relation to the above, the Regional Assembly notes the suggested increase from the current density parameters and ranges set out in the 2009 Guidelines. The increased density ranges and bands assist in transposing the requirement for more compact growth patterns arising from the NPF priorities, which are also included in the current RSES for the Region

In line with the Regional Assembly's previous submission on the 'Proposed Policy Approach to the Draft Sustainable and Compact Settlement Guidelines' in April 2023, it is considered that the finalised guidelines could be strengthened by outlining how local authorities are to address the existing quantum of lands zoned for residential development having regard to the new density requirements and associated zoned land requirements.

Notwithstanding the above, the Regional Assembly considers the information provided in Section 3.3 'Refining Densities' and the corresponding Table 3.7 of the draft Guidelines to be sufficiently detailed to determine proposed development sites that fall within the various categories for public transport accessibility. It is suggested in this table that the NTA are developing a public transport accessibility mapping tool that may assist planning authorities in developing local development objectives and in the consideration of individual applications. It is considered such a mapping tool will be imperative to the effective implementation of densities ranges set out in the draft Guidelines and to ensure consistency being applied by planning authorities on this issue.

Moreover, Figure 3.3 in the draft Guidelines provides a useful illustrative guide as to the typical density ranges that can be achieved using various housing typologies and is commended by the Regional Assembly.

The Regional Assembly also supports the move to a more plan led approach to the identification of appropriate residential densities at settlement level and will assist in providing information to both the public and developers alike as to what housing densities are appropriate at neighbourhood level during the local plan-making process. The draft Guidelines promote the defining and mapping of central, urban, suburban and edge locations for density purposes.

## **2.4 Quality Design and Placemaking**

Chapter 4 of the draft Guidelines provides guidance to planning authorities on the planning and design of new housing developments at settlement, neighbourhood and site levels. Advice is provided on urban design and quality placemaking processes including analysis and appraisal, vision and strategy and detailed design. The Regional Assembly welcomes the guidance provided in Section 4.4 of the draft Guidelines regarding 'Key Indicators of Quality Design and Placemaking' which highlights the targets set out in the National Sustainable Mobility Policy 2022 for reduced private car travel and increased active travel. The key principles outlined in this section to be considered in both the preparation of local plans and individual planning applications is a useful guide for planning authorities and potential developers in setting out a broad masterplan for the appropriate and integrated planning of larger development parcels, in line with the principles of the Design Manual for Urban Roads and Streets (DMURS) and Policy and Objective 4.1 of the draft Guidelines. It is considered that this also supports RSO 4 (Healthy Communities) and RSO 6 (Integrated Transport and Land Use) in the RSES, in addition to RPO 9.10 (Healthy Placemaking) in the need to provide alternatives to the car and to promote cycling and walking in the design of streets and public spaces.

In addition, Section 4.4 (iii) 'Green and Blue Infrastructure' of the draft Guidelines outlines that a strategy for Green and Blue Infrastructure should be included in the preparation of development plans and include objectives for conservation, restoration and enhancement of natural assets and GBI networks. It is noted that these objectives can be refined further in local statutory plans and guidance documents in response to local circumstances. The Regional Assembly welcomes the recognition and inclusion of the importance of Green and Blue Infrastructure in the draft Guidelines. The inclusion of same is complemented by Section 7.7 of the current RSES for the Region with RPO 7.22 and RPO 7.23 noting the importance of the preparation of Green Infrastructure strategies as part of local plan-making processes, their linkage to nature conservation measures (including protection of European sites) and supporting the co-ordination of mapping of strategic

Green Infrastructure across the Region.

In relation to Section 4.4 (iv) 'Public Open Space' of the draft Guidelines it is a requirement for all statutory development plans to now include a strategy for the provision of an integrated hierarchy of public open spaces and corridors across the plan area to meet the needs of the planned population. This is a welcome provision with each public open space strategy in the development plan to include objectives relating to the provision of;

- (a) Regional, settlement, district and local level parks (Class 1 Open Space)
- (b) Local parks, squares or plazas (Class 2 Open Space)

While there is no set level of open space provision per settlement in the draft Guidelines, a benchmark of 2.5ha of open space per 1,000 population has been used internationally. It is recommended in the draft guidelines that all residents within a settlement should have access to a Class 2 multi-functional public open space within walking distance of their home.

Overall, the Regional Assembly welcomes the ambitions and guidance set out in this chapter of the draft Guidelines and considers that it aligns with the Guiding Principles for 'Healthy Placemaking' in Section 9.4 of the RSES for the Region, in the design and layout of all new developments, to promote good urban design, enhanced public realm, and opportunities for walking, cycling and active lifestyles, in order to create healthy and attractive places. In this regard Healthy Placemaking RPO 9.10 states that in planning for the creation of healthy and attractive places, there is a need to provide alternatives to the car and to prioritise and promote cycling and walking in the design of streets and public spaces.

## 2.5 Development Standards for Housing

Chapter 5 of the draft Guidelines provides detailed commentary on development standards for new housing including a new focus on current Government policy to support medium density 'own door' housing models in Ireland, alongside traditional housing and apartment developments. To enable greater innovation, a graduated and flexible approach to the application of residential development standards is required across all housing typologies. Section 5.3 sets out detailed standards for housing and duplex units development proposals. Some of the main topics covered include;

- Separation Distances: It is now proposed under SPPR 1 (Specific Planning Policy Requirement) that statutory development plans shall not include objective(s) in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or sides of houses, duplex units or apartment units above ground floor level. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitably privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.
- Private Open Space for Houses: Under SPPR 2 it is a specific planning requirement of the draft Guidelines that proposals for new houses meet the following private open space standards;

House	Minimum Private Open Space	Max Semi-Private (in lieu)
1 Bed House	20m <sup>2</sup>	10m <sup>2</sup>
2 Bed House	30m <sup>2</sup>	15m <sup>2</sup>
3 Bed House	40m <sup>2</sup>	20m <sup>2</sup>
4 Bed + House	50m <sup>2</sup>	25m <sup>2</sup>



It is noted that a further reduction below the minimum standard may be considered acceptable where the equivalent amount of high quality semi-private open space is provided in lieu of the private open space subject to at least 50% of the area being provided as private open space.

- **Public Open Space:** It is a specific policy requirement of the draft Guidelines under SPPR 3 that proposals for new residential development include areas of functional open space that collectively equate to not less than 10% (minimum) of the net site area. Statutory development plans shall not include objective(s) in respect of minimum public open space requirements that exceed 10% save in the case of a historic setting, as detailed in the Guidelines. SPPR 3 also includes an option to offset (in part or whole) the public open space requirement by way of a financial contribution towards the provision of a new public open space or enhancement of existing public open space or amenities in the area in lieu of provision within the application site itself.
- **Car Parking (Quantum, Form and Location):** The draft Guidelines advocate for significant reductions in car parking provision in order to meet targets for reduced private car usage as set out in the National Sustainable Mobility Policy 2022 and the Climate Action Plan 2023. It is stated that car parking ratios should be reduced at all urban locations and should be minimised, substantially reduced or wholly eliminated at locations that have good access to urban services and to public transport. Under SPPR 4, the following car parking standards are set out;

Settlement Type	Car Parking Provision
City centres and urban neighbourhoods of the five cities (Dublin, Cork, Limerick, Galway & Waterford) outlined in Chapter 3, Tables 3.1 and 3.2	Car parking provision should be mimimised, substantially reduced or wholly eliminated. The maximum rate of car parking for residential development at such locations is 1 space per dwelling.
Accessible urban locations as defined in Chapter 3, Table 3.7	Car parking provided should be substantially reduced. The maximum rate of car parking provision at such locations is 1.5 spaces per dwelling.
Intermediate and peripheral locations, as defined in Chapter 3 Table 3.7	The maximum rate of car parking provision for residential development should be 2 no. spaces per dwelling.

- **Bicycle Parking and Storage:** The draft Guidelines require that cycling as a transport mode is fully integrated into the design of all new residential schemes. In particular, in areas of high and medium accessibility, planning authorities must ensure that new residential developments have high quality cycle parking and cycle storage facilities for both residents and visitors. The accessibility to, and secure storage, of bicycles is a key concern for residents in more compact housing developments. Under SPPR 5 (Cycle Parking and Storage) it is a specific planning policy requirement that all new housing schemes (including mixed use schemes that include housing) include safe and secure storage facilities to meet the needs of residents and visitors. The following requirements for cycle parking and storage are recommended;

	<b>Car Parking Provision</b>
Quantity	For residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied with visitor cycle parking also provided.
Design	Cycle storage facilities shall be provided in a dedicated facility of permanent construction within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction.

The Regional Assembly notes the new development management standards for new residential development outlined in Chapter 5 of the draft Guidelines. As per the previous submission of the Regional Assembly to the ‘Proposed Policy Approach to the Draft Sustainable and Compact Settlement Guidelines’ in April 2023, the Regional Assembly consider that the Guidelines could be strengthened through the provision of the rationale and evidence base used to inform the changes relating to public and private open space and separation distances for opposing upper floor windows.

The RSES emphasises Healthy Placemaking as a Key Principle in order to promote people’s quality of life through the creation of healthy and attractive places, to drive the delivery of quality housing (RSO 2) and enhance the quality of our built and natural environment to support active lifestyles (RSO 4). Furthermore, the Guiding Principles for ‘Healthy Placemaking’ as set out in the RSES, emphasise that provision of open space should consider types of recreation and amenity uses required, public open spaces are to have good connectivity and be accessible by safe, secure walking and cycling routes, and finally open space is to be planned for on a multi-functional basis incorporating ecosystem services, climate change measures, Green Infrastructure and key landscape features in their design.

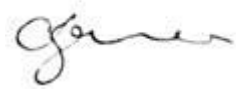
### **3.0 Conclusion**

The Regional Assembly welcomes the publication of the draft Sustainable and Compact Settlement Guidelines for Planning Authorities (August 2023), having regard to the provisions of recent national and regional strategies (the NPF and RSES) with a significant emphasis on compact growth and urban regeneration in order to achieve sustainable development patterns to accommodate increased population projections in Ireland over the next 20 years.

In particular, the Regional Assembly welcomes the ambitions and guidance of the draft Guidelines, and the complementarity with the Key Principle of Healthy Placemaking of the RSES, while supporting the concept of the 15-minute city and identifying the importance of Green and Blue Infrastructure. Furthermore, the Regional Assembly notes the overall approach to achieving a plan led roll-out of appropriate densities at various settlement levels.

The Assembly welcomes the opportunity to engage in the process of preparing the new Sustainable and Compact Settlements Guidelines for Planning Authorities and looks forward to continuing any further engagement with the Department of Housing, Local Government and Heritage towards the finalisation of same.

Regards,



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Clare Bannon  
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26<sup>th</sup> September 2023