

Irish Green Building Council's submission on Sustainable and Compact Settlements Guidelines for Planning Authorities - Proposed Policy Approach

INTRODUCTION

The Irish Green Building Council (IGBC) provides leadership for a sustainable built environment. IGBC is a registered charity with over [340 corporate members](#) drawn from all parts of the value chain, from occupiers, design professionals, contractors, suppliers, academics and public authorities and affiliated with a global network of 70 national councils within the World Green Building Council. This allows us to create workable solutions and tools to deliver transformative change towards a sustainable built environment.

Over the last few years, the IGBC has developed a number of projects and tools to support the development of sustainable and compact settlements. These include:

- The **Home Performance Index**: The Home Performance Index (HPI) is Ireland's national certification for sustainable new residential developments. The certification goes well beyond the BER to address all the environmental impacts of new homes such as the production of building materials, impact on ecology – mandatory indicator, pollution, water consumption and flood risk. Key indicators in relation to compact settlements include land use (EN1.0), residential density and mix (EN2.0), as well as all the indicators listed under section 3.5 (sustainable location). The technical manual is [available here](#). The HPI also encourages home builders to improve the health of new homes by improving daylighting and acoustics and minimising harmful chemicals such as radon and VOCs. The latest version of the HPI (version 3) is aligned with the EU Taxonomy requirements across various indicators. Over 20,000 homes are already registered for certification, and the HBFI and AIB offer low interest development loans for projects which reach certification.
- **Viable Homes**: Viable Homes aims at developing practical guidance for planners and developers for carbon optimisation of constructions and developments, which will be available by the end of 2023. It will create a handbook of low rise typologies that optimise density, cost, adaptability, operational and embodied carbon. The project is funded under the Housing for All fund available through the Department of Enterprise, Trade and Employment, and supported by [Construct Innovate](#). The project partners are the IGBC, the Building in a Climate Emergency Research Group (BIACE), and the Centre for Irish Towns (CfIT) - both based in University College Dublin.
- **RE-CUGI**: Building upon the findings of Viable Homes, RE-CUGI (Reducing Emissions through Compact Urban Growth in Ireland) will apply a transdisciplinary approach to the holistic evaluation of emissions benefits of compact urban growth in Ireland. It will quantify and demonstrate carbon emissions, taking into consideration location, infrastructure, and servicing, built form and climate change impacts. The project will develop new/improved tools, datasets, processes, recommendations, and guidance to support and promote compact urban growth that will, inter alia, redefine and support best practice in low carbon compact urban growth; help steer decisions and funding to best practice in sustainable development; engender a cultural shift in attitudes away from greenfield and suburban development towards compact urban growth; and support EU and Irish government policy. RE-CUGI is a two-year project (2023-2025) funded by the SEAI. The project partners are the IGBC and University College Dublin.

This **submission was developed in close cooperation with our members**, incorporating the feedback received during the development of our [Building a Zero Carbon Ireland Roadmap](#) (including workshops on planning) and our experience on the ground, developing the Home Performance Index and certifying projects.

SUMMARY

The IGBC **welcomes the Minister's intention to publish new Sustainable and Compact Settlements Guidelines for Planning Authorities, which will reinforce the need for more compact and efficient forms of development** and set detailed criteria for residential development to support the development of this type of settlements.

Urban land expansion in Ireland is among the highest in Europe and has been characterised by the existence of scattered, remote urban structures in many places (Ahrens, 2019). **In a climate and biodiversity crisis, transitioning to sustainable and compact settlements is urgent and must be a priority.**

The **new homes we deliver must not only be highly energy efficient, but they must also be built and renovated in a low-carbon way and be well-connected to local communities.** Transport is Ireland's second highest and fastest growing source of carbon emissions (DECC, 2022). Increasing density would facilitate a more effective use of both existing and any new transport infrastructure and contribute to a reduction in transport emissions¹.

Transitioning to this type of development would also allow us to address some of the main sources of biodiversity loss, including habitat destruction and fragmentation¹.

Although the **IGBC acknowledge the need to consider the different contexts in which housing development takes place**, we believe **some of the suggested policy (e.g., on density)**, added to the relatively unambitious Compact Urban Growth targets included in the National Planning Framework¹, **could lead to further urban sprawl and prevent us from reaching the overarching aims of our Sustainability Mobility Policy, and our climate targets.**

More specifically, **minimum density requirements are required across Ireland (including in rural towns and villages) and should not be below 35 homes per hectare.** Furthermore, the **spread of densities under each category is too great**, and risk undermining the strategy. **More qualitative indicators around residential use and mix use²** should also be included in the guidance document.

A **comprehensive glossary should be added to this document as some of the terms used are ambiguous** and subject to interpretation, making the provision of meaningful feedback challenging. For instance, it would be useful to understand how the “most central and most accessible urban locations”, or “areas of medium accessibility” are defined.

Enforcement and consistency of enforcement across local authorities will be critical to avoid unintended consequences, such as developments happening in counties with the lowest requirements.

To summarise, **in a climate and biodiversity emergency, and given existing sprawl patterns and vacancy rates³, the “Sustainable and Compact Settlements Guidelines for Planning Authorities” must be more ambitious.** To raise

¹ Target 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.

² The Home Performance Index Technical Manual, and more specifically indicator EN 2.2: Residential Mix and the Sustainable Location section (3.5) could inform the development of these indicators.

³ Collaborative Town Centre Health Check Programme (CTCHC) land use surveys (Step 2 of a 15- Step assessment process) highlight that the ground floor commercial vacancy rate in towns in Ireland is 18- 31.45% - the normal target at a European level is 5%. The upper floors in towns are at c. 80% - both these levels are disproportionately high in a European context. (CTCHC, 2022).

awareness about these issues, the Government could also consider introducing soil sealing targets as already done in some European countries⁴.

The IGBC would be delighted to inform the Government of the findings of the Viable Homes and RE-CUGI projects on a regular basis, and to support the development of Sustainable and Compact Settlements Guidelines for Planning Authorities.

DENSITY

The IGBC support the rational for transitioning to Sustainable and Compact Settlements detailed in the first three paragraphs of this section, but believe that in a climate and biodiversity crisis, a reference to the positive impact of this type of developments on embodied carbon emissions and biodiversity loss should be added.

Although the IGBC acknowledge the need to consider the particular circumstances of individual sites, **we are concerned about some of the suggested densities**, as these **could prevent us from achieving the overarching aims of the Sustainability Mobility Policy (SMP), the 10% reduction in the number of kilometres driven by fossil-fuelled cars mentioned in the Climate Action Plan 2023, and ultimately our climate targets.**

While the SMP approach is based on the principle of Avoid-Shift-Improve, **densities of 25-30 dph would not allow us to avoid** (reduce the frequency and distance of trips by ensuring more people live in closer proximity to a wider range of services) **or shift** (ensure communities are well designed so as to move towards more environmentally friendly modes of transport, such as walking, cycling or using public transport).

The **spread of densities under each category is too great, and risk undermining the strategy.** E.g., 40 dph and 150 dph are completely different developments. Furthermore, as the draft document states that “densities at the upper end of the specified range are applied at the most central and most accessible urban locations, with densities at the mid-point and lower end of the range as proximity and accessibility reduce”, terms such as “most central and most accessible urban locations” must be clearly defined.

“Densities that respond to existing context” for rural towns and villages is far too vague and would also put the rest of the strategy at risk. **Minimum density requirements (e.g., 35 dph) are required across Ireland, including in rural towns and villages, for all new developments.** This statement could lead to more, larger, luxurious developments being built on outskirts of villages as these are more viable. Furthermore, adding an area of low density to an existing village has nothing to do with the existing context, and should not need to comply with it.

More specifically, a **minimum density of 75 dph** should be required in **all areas of cities and metropolitan towns.** That minimum density should be of **50 dph in all areas of large towns**, and **35 dph in all areas of Small and Medium Sized Towns, and Rural Towns and Villages.**

Finally, the guidance document **should not only include quantitative “density” indicators, but also more qualitative indicators around residential use and mix use**⁵.

⁴ E.g., France (France, 2021) and Germany (Artmann, 2014).

⁵ The Home Performance Index Technical Manual, and more specifically indicator EN 2.2: Residential Mix and the Sustainable Location section (3.5) could inform the development of these indicators.

HOUSING STANDARDS

Given demographic changes and to support greater reuse of the existing stock, the IGBC believe that a **greater range of high-quality housing options is needed**⁶. We also welcome the strong emphasis on the creation of attractive streets and open spaces – see next section, as key in creating a strong sense of place and community.

However, we are **concerned by the objective of “facilitating medium density housing models in Ireland, alongside traditional housing** and apartment developments”. Although “medium density housing models” and “traditional housing” are not defined, we would like to highlight that the **average new home size area in Ireland is 28% above the European median**, leading to a very substantial impact on both operational and embodied carbon emissions (Kinnane, 2022). This is mainly due to 24% of new homes built in 2018 (the reference year used in the Kinnane’s study) being large, detached homes. **The strategy cannot work if higher density requirements in cities and large towns are undermined by the development of large, detached homes in rural areas.** Furthermore, the trend of smaller households is likely to continue and to get closer to the EU average over the next few years. The fertility rate in Ireland has already dropped from 2.05 in 2010 to 1.6 in 2020. Therefore, the mix of home sizes needs to be re-evaluated with a sufficiency of 3- and 4-bedroom homes likely already within the existing stock. Integration of 1- and 2-bedroom homes into neighbourhoods could enable downsizing, freeing up family homes for those who need them. **Policy could accelerate a reduction in the construction of the number of detached sub-optimally sized homes and support a transition to more compact forms of development such as apartments and terraced homes.** This will also reduce operational energy use from these new homes. The advantage for housing policy is that this **would allow more homes to be built for less cost in manpower, materials, and carbon emissions.**

In relation to the recommended standards:

- The separation requirements are fine, but recommendations are also required on opposing front facing windows.
- Further clarity on the private open space requirements is needed, as it’s unclear how a bedspace is calculated.
- The IGBC strongly support the general approach to minimising car parking requirements, but areas of “high accessibility” and “medium accessibility” need to be clearly defined. Furthermore, in all new developments, most of car parking should be clumped together, as opposed to being provided within the curtilage of the home. This would make it easier to reclaim the land used for car parking as public transport and active travel services are improved and cars become less needed.

QUALITY DESIGN & PLACE MAKING

The IGBC **welcome that the policy will include guidance in relation to quality design and placemaking**, including indicators of quality design and placemaking sustainable and efficient movement, the mix and distribution of land uses, the integration of natural assets and green infrastructure and built form. [Section 3.5. Sustainable Location of the Home Performance Index technical manual](#) may be useful when developing this guidance.

Although the IGBC acknowledge that “the quality of design and placemaking will be particularly important in the case of compact housing”, we believe that the **quality of design and placemaking should be seen as important for all projects. To reduce embodied carbon emissions and waste, adaptability must be at the heart of all new developments.** This can be better supported through quality design and placemaking.

⁶ See [Building a Zero Carbon Ireland roadmap](#) and our recommendation to accelerate a reduction in the construction of the number of detached sub-optimally sized homes and support a transition to more compact forms of development such as apartments and terraced homes.

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