



# RTPI Ireland

mediation of space · making of place

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24 September 2018

Dear Sir/ Madam

## **Draft Urban Development and Building Height Guidelines for Planning Authorities**

The Royal Town Planning Institute (RTPI) Ireland is a leading planning body for spatial, sustainable, integrative and inclusive planning. We work to promote the art and science of planning for the public benefit and doing so we:

- support policy development to improve approaches to planning for the benefit of the public;
- maintain the professional standards of our members;
- support our members to have the skills and knowledge they need to deliver planning effectively;
- maintain high standards of planning education;
- develop and promote new thinking, ideas and approaches which can improve planning;
- support our membership to work with others who have a role in developing places; and
- improve the understanding of planning and the planning system to policy makers, politicians, practitioners and the general public.

We are pleased to respond to the consultation on Urban Development and Building Height Guidelines for Planning Authorities. Generally we welcome that the guidelines:

- identify the need for intensification along existing and proposed high capacity sustainable transport routes
- identify well located areas with lesser sensitivities that are suitable for higher densities
- remove the relationship between height and use
- set out that height is to be determined by performance criteria rather than 'generic' height limits criteria.

Our detailed views are set out below.

### **The Role of Planning, Planners and the Planning System**

RTPI Ireland welcomes the Government's intentions to support more dense and compact urban cities, something that we also supported in the development of the National Planning Framework. In doing this we appreciate that the guidelines broadly recognise that planners, planning and the planning system seek to address conflicting interests and demands on building heights and take

account of the need for nuanced and differentiated approaches to deal with specific circumstances. Key to this will be ensuring that any decisions or policy made on building heights recognise the need to maintain, and where possible enhance, residential amenity.

### **Design Quality**

Changes to building heights guidance should aim to enhance the quality of buildings and places that are developed across Ireland. However the guidelines are only a part of this. Therefore we need to have strong messaging through Government policy and legislation advocating and promoting design excellence and the use of quality materials. This will help to better ensure we create more consistently well-designed places across the country.

### **Heritage and Conservation**

RTPI Ireland is also of the view that conservation of views and prospects needs to be included – and re-stated - in the guidance. The guidelines also need to say more about the need to support heritage and conservation objectives and make clear their relationship with recent guidance published by the DHPLG on apartments.

In particular we welcome part E3 of SPPR4 which discusses the need to avoid mono-type building typologies.

### **Consistency**

There is a need clarify the relationship and consistency of approach between the guidelines and:

- Section 168 of the Planning Act which discusses a requirement for maximum heights with respect of planning schemes
- Section 34 of the Planning Act in relation to material contravention
- LAP guidance which currently states that local area plans should provide 'detailed guidance' in relation to height
- the Sustainable Residential Guidelines 2009 that say that there should be no upper limit on the number of dwellings within any town or city centre site, subject to 'conformity' with any vision of the urban form of the town or city as expressed in Development Plans 'particularly in relation to 'height or massing'

### **Development Plans**

We have concerns that the approach advocated in the guidelines does not highlight the key role that can be played by development plans, but rather focusses too much on the development management aspects of planning. The guidelines should better recognise the importance of a planned approach, in particular the role of detailed urban design frameworks, through LAPs and SDZs, in setting heights. It is our view that it would be more effective and efficient to take a pro-active and frontloaded approach, through promoting policies on building heights as this can take account of a well evidenced policy position and therefore provide more certainty for developers, investors and communities.

In particular there is an issue on how the proposed approach will work for SDZs given that there is no right of appeal in these areas. Given this, we question if the guidelines should apply to SDZ Planning Schemes.

### **Performance and Technical Issues**

We also believe that as currently drafted the guidelines can be unclear. Greater clarity is required, especially regarding performance criteria, and it would be useful if the guidelines were accompanied by a technical appendix or separate section or document called Design Guidelines for Taller Buildings which deals with:

- explicit 'performance criteria' on dealing with amenity impacts on neighbouring buildings and streets (overshadowing, overlooking, visual impact etc.)
- Defining the aspects of the character (scale, grain, proportions etc.) of existing street/area that should influence/be integrated into the new build
- How to reconcile height with heritage and adjoining lower rise buildings.

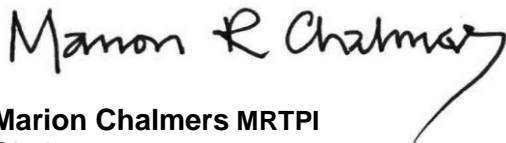
### **Resourcing**

We feel that if the guidelines are to be implemented successfully there is a need to support planners to enhance their understanding of the issues through Government investing in a robust evidence base which also highlights good practice examples, along with support for skills development through training.

The Government also need to take consideration of the resource implications of the implementing the guidelines at a time when many planning authorities can be under-resourced and suffer from stretched budgets.

We would be happy to discuss or clarify any aspect of our submission. Our Director, Craig McLaren can be contacted on 08925 15649 or [contact@rtpireland.com](mailto:contact@rtpireland.com) if you would like this be arranged.

Yours faithfully

A handwritten signature in black ink that reads "Marion R Chalmers". The signature is written in a cursive style with a long, sweeping tail on the final letter.

**Marion Chalmers MRTPI**  
Chair