

National Planning Framework Submission

8th November, 2017

Re: Addressing housing and density (in Dublin) in the National Planning Framework.

A Chara,

1.0 Introduction

The BSc. (Hons) in Spatial Planning final year class in DIT Bolton Street would like to make a submission on the Draft National Planning Framework. The submission relates to the housing and population density in Dublin and the need to increase same. The content of this submission is informed by our fourth year project entitled *“Can Intensification without compromising amenity be achieved in Dublin by locating high density residential developments on vacant and opportunity sites adjacent to underutilised infrastructure?”* (Hereafter referred to as the DIT Planning 2017 final year project).

This focuses on the Census housing and population statistics of Dublin City and County in order to understand housing density in relation to quality bus corridors (QBCs). This research identifies and maps the best and worst performing Electoral Divisions (ED’s) in each Local Authority area in Dublin with respect to housing density. The findings of this research are shown on Map 1.1. 1.2, 1.3 and 1.4.

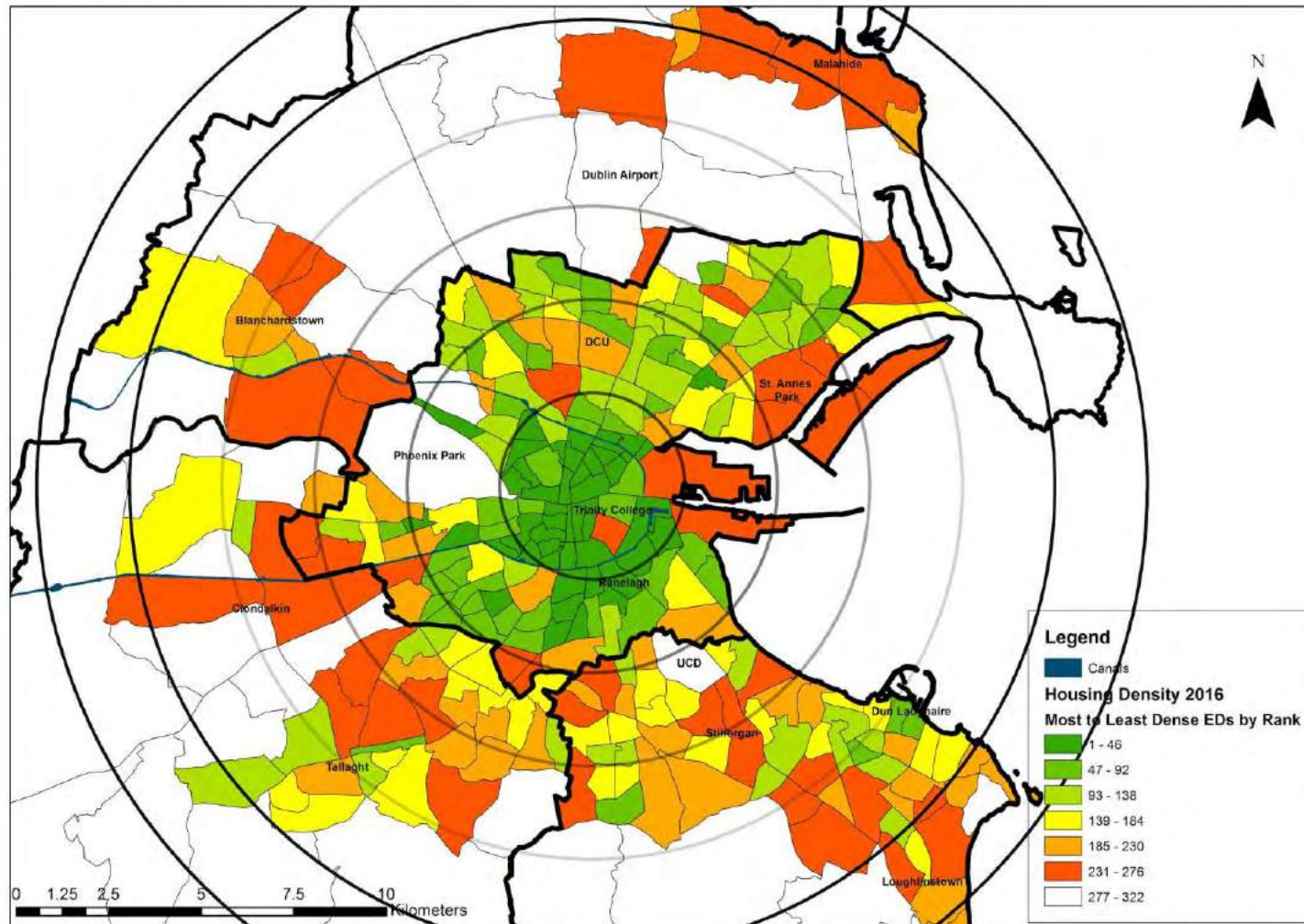
The Research project is modelled on the approach taken in the ‘Redefining Density; making the best use of London’s land to build more and better homes’ by the Greater London Authority, 2014. The London study investigates how to achieve densification near underutilised infrastructure. This methodology was used when collecting and analysing the housing and population data for Dublin in the 2011 and 2016 Irish Census (CSO) for the DIT Planning final year research project. In the project, housing density is used as an indicator for underutilised infrastructure.

This submission relates the findings of the DIT Planning final year research project to the key priorities that are included in the Draft NPF. Specific reference is made in this submission to the following issues that are raised in the Draft NPF:

- The Strategic Direction of the Draft NPF
- Compact Cities
- Planning for Ireland's Urban Growth
- Achieving Urban Infill / Brownfield Development
- Sustainable locations of appropriate scale
- Housing
- Possible NPF Proposals

Map 1.1 below indicates the most dense (dark green) and least dense (white) Electoral Divisions (EDs). The rings on map 1.2 display the distance from the GPO in increments of 2.5km. As shown, Dublin City Centre is the most dense part of the county. There is a correlation between the distance from the city centre and housing density, it consistently decreases. Our study will primarily be focusing on the EDs that are yellow, light orange and dark orange (these are the EDs with the lowest housing density) with the principal objective of identifying opportunity sites and proposing a number of strategies in order to increase density.

Map 1.2 Ranking in Order of Most to Least Dense EDs in Dublin City and County with 2.5km Distance Rings



2.0 The Strategic Direction of the Draft National Planning Framework

2.1 We support the proposed policies of the Draft NPF which focuses on delivering a more sustainable future in urban areas that are more condensed and less sprawling. The allocation of 20-25% of national population and housing growth in Dublin City and Suburbs is considered to be a realistic target over the time frame of the NPF.

2.2 In addition, the explicit policy direction for how this growth is to be achieved through consolidation and infill development in Dublin is welcomed. The data from our research project demonstrates that densities in Dublin City and County Electoral Divisions (EDs) are notably low compared to other European and international cities of comparable scale, and that this is a major contributor to urban sprawl.

3.0 Compact Cities

3.1 We strongly agree with the identified national strategic outcome (Draft NPF, p. 123) in support of the development of the sustainable growth of compact cities – particularly the top priority of *“activating these strategic areas and achieving effective density and consolidation rather than more sprawl of urban development’ in Ireland’s cities”* (ibid, p. 123).

3.2 The DIT Planning 2017 final year project involved collating current residential densities in the city using the 2011 and 2016 census information and transforming the data sets using ArcGIS to generate interactive maps. Following an analysis of all 322 EDs in Dublin City, Fingal, Dun Laoghaire - Rathdown and South Dublin County Council, it was revealed that Dublin City performs relatively well in terms of density, but the more suburban residential areas in Fingal, South Dublin and Dun Laoghaire perform very poorly and serve to reduce the average housing density (using the 2016 CSO information) to 20 units per Ha or 2003 per km² (Dublin City 2,877 per Km²). While the average population density in Dublin City and County is 14 persons per ha and 1,434 per km².

3.3 This density is significantly below other European Cities of similar size and scale to Dublin and in major world cities like London and New York. These differences are revealed in tables 3.3.1 and 3.3.2.

Table 3.3.1 Population densities of major cities in comparison with Dublin.

Population Density (Major Cities)	Population per Km ²	Housing per Km ²
Dublin County	1,434 (2016)	570 (2016)
Dublin City	4,700 (2016)	2,058 (2016)
Madrid	5,304	ENA
NYC	9,610	ENA
London	4,800	ENA
Paris	8,539	ENA

ENA; Equivalent figures not available for submission

Table 3.3.2 Population densities of similar size cities in comparison with Dublin.

Population Density (Similar Size Cities)	Population Density per Km ²
Dublin County	1,434 (2016)
Dublin City	4,700 (2016)
Glasgow	3,298 (2011)
Copenhagen City	6,800 (2017)
Manchester	4,680 (2016)
Amsterdam	5,097 (2016)

Therefore, achieving '*effective density and consolidation*' in suburban areas (many of which are outside the Dublin City Council area) is essential if Dublin is to meet all of its land use needs, compete internationally and perform its role as a driver of national growth.

3.4 This lower population density is partially explained by much smaller numbers of accommodation that can be found per Ha² in Dublin City and County compared to other European and international Cities. Our findings show that the top 59 EDs in terms of housing density are within the city in the Dublin City Council area. The following tables demonstrate that the most dense Dublin City Council area has a housing density that is approximately 350% higher than the areas with the highest housing densities in Fingal, South Dublin and Dun Laoghaire - Rathdown (As illustrated in table 3.4.1).

Table 3.4.1 Highest Housing Density EDs in Dublin City & County

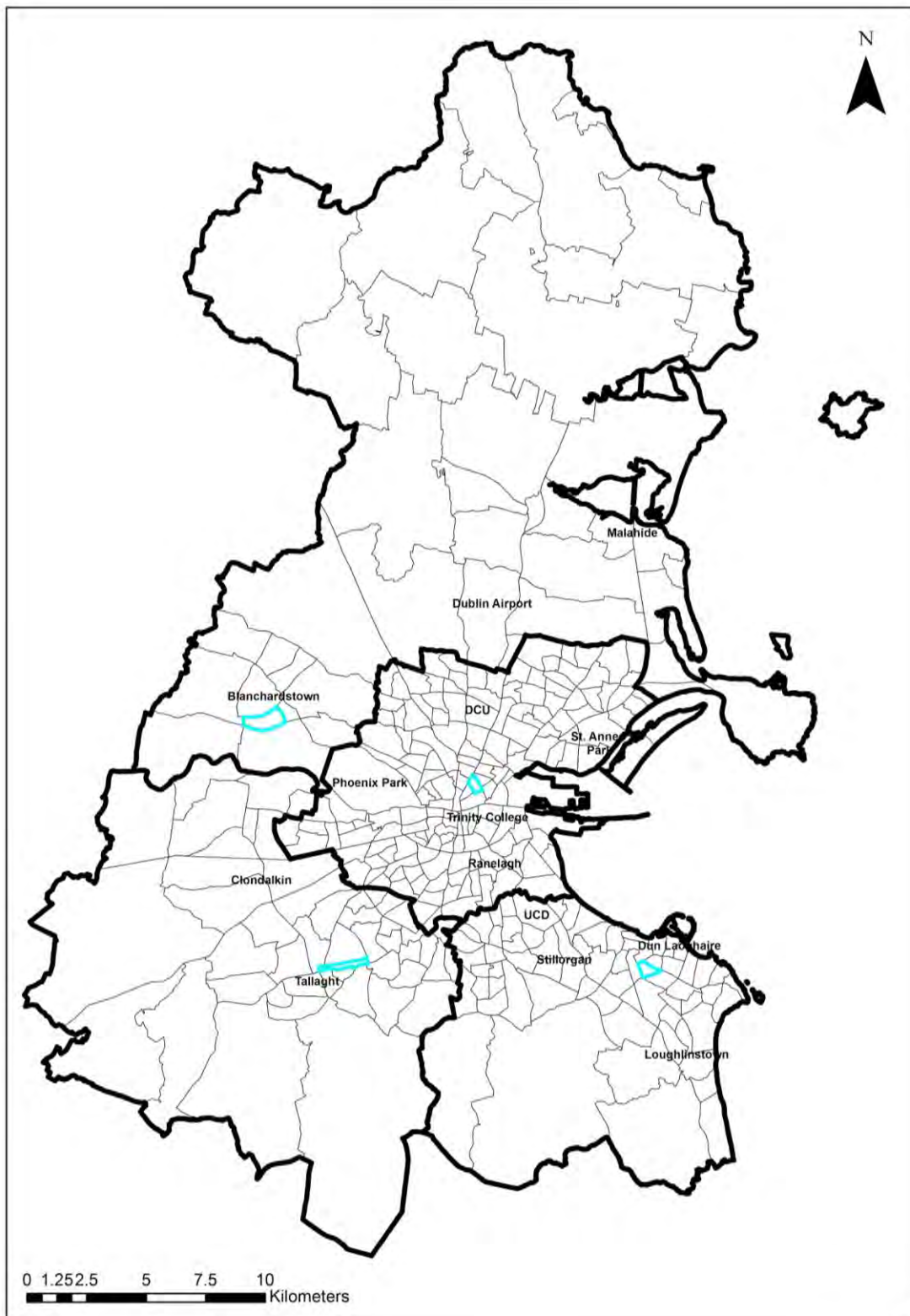
Local Authority	ED Name	Highest Housing Density Ha ²	% Difference	Rank of ED (out of 322 ED's in Dublin City & County)
Dublin City Council	Rotunda A	90.29	Highest density	1
Dun Laoghaire - Rathdown County Council	Dún Laoghaire -Monkstown Farm	27.3	25% of the density achieved in highest density Dublin City ED	60
Fingal	Blanchardstown -Delwood	20.1	18% of the density achieved in highest Dublin City ED	64
South Dublin County Council	Tallaght-Glenview	22.61	20.5% of the density achieved in highest Dublin City ED	89

Table 3.4.2 EDs with the lowest Housing density in Dublin City & County

Local Authority	ED Name	Lowest Housing Density Ha ²	Rank of ED (out of 322 ED's in Dublin City & County)
Dublin City Council	Carna	19.44	120
Dun Laoghaire - Rathdown County Council	Shankill-Rathmichael	1.4	303
Fingal	Lucan North*	0.4	313
South Dublin County Council	Rathcoole*	1.26	307

(EDs 314 to 322 which were of a particular rural, amenity or industrial zoning dominates the land use were excluded due to being less comparable to urban residential areas.)*

Map 1.3 Highest Housing Density EDs in Dublin City & County



Map 1.4 Lowest Housing Density EDs in Dublin City & County

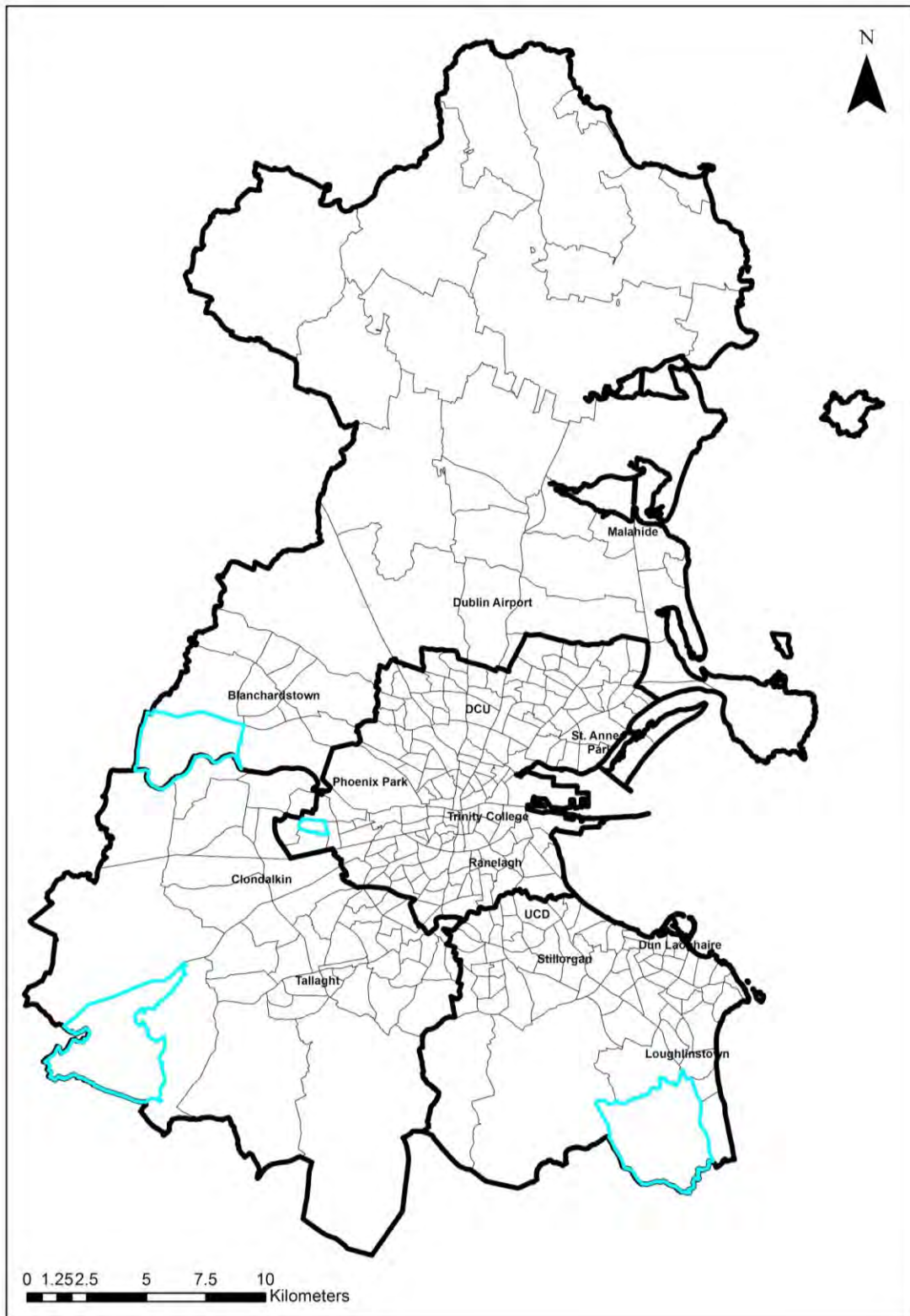


Table 3.4.3 ED's with the Highest Population Density in Dublin City & County

Local Authority	ED Name	Population (2016)	Population Density Ha ²	Rank of ED (out of 322 ED's in Dublin City & County)
Dublin City Council	Rotunda A	5629	225.97	1
Dun Laoghaire - Rathdown County Council	Dún Laoghaire - Monkstown Farm	2278	66.94	60
Fingal	Blanchardstown - Delwood	5126	50.7	104
South Dublin County Council	Tallaght - Jobstown	17,788	65.09	65

Table 3.4.4 ED's with the Lowest Population Density in Dublin City & County

Local Authority	ED Name	Population (2016)	Population Density Ha ²	Rank of ED (out of 322 ED's in Dublin City & County)
Dublin City Council	Mansion House B	1,278	19.46	266
Dun Laoghaire - Rathdown County Council	Shankill - Rathmichael	5,617	3.76	305
Fingal	Lucan North	3,452	1.3	311
South Dublin County Council	Rathcoole	5,520	3.50	306

(EDs 314 to 322 which were of a particular rural, amenity or industrial zoning dominates the land use were excluded due to being less comparable to urban residential areas.)*

4.0 Planning for Ireland's Urban Growth

4.1 We fully support the objective included in section 3.8 of the Draft NPF (p. 50);

'Ireland 2040 targets a significant proportion of future urban development on infill / brownfield sites within the built envelope of existing urban areas. This is applicable to all scales of development from the largest city to the smallest'.

This objective is required given the noticeably lower average densities in areas outside of Dublin City and the urgent need to provide additional housing in locations that are accessible by public transport.

4.2 We also endorse the target set out in table 2.1 of the NPF to locate 50% of all new housing in Dublin City and suburbs on infill and brownfield sites. Our study revealed that this is both a practical and sustainable way to meet our housing needs.

4.3 However, following the preliminary results of our DIT Planning 2017 final year project, we suggest an additional focus is required for consolidating urban growth. A higher proportion of housing targets should be considered. For example, each Local Authority should aim to reach a minimum average housing density of 40 units per Ha (the current average is 20 units per Ha). The local authorities of Fingal, South Dublin, and Dun Laoghaire - Rathdown, significantly underperform in housing and population densities compared to Dublin City Council. An additional onus should be put upon these LAs to help consolidate and enhance the sustainable development of Dublin.

5.0 Achieving Urban Infill/Brownfield Development

5.1 Continuing to develop green field locations exacerbates urban sprawl and produces more new low densities further from the city.

Stated in the Draft NPF;

"Active land management measures to support urban infill/brownfield development targets include the ability to assemble sites for development and/or to relocate existing space extensive uses that may be better suited to peripheral 'greenfield' locations" (p.51)

We strongly agree that the development of brownfield and infill sites in urban areas should be prioritised in favour of greenfield locations.

5.2 Map 1.1 identifies all areas in Dublin City and County that have low housing densities with supporting infrastructure. We believe that *'active land management'* (such as the use of CPO, Local Area Plans, and SDZs) on the part of Local Authorities is needed in order for these sites to be developed at higher urban densities. Particularly Fingal, South Dublin, and Dun Laoghaire - Rathdown who warrant particular attention due to their lower densities.

5.3 As it currently stands, department policies and the written statements of current Local Authority development plans place limitations and onerous restrictions on the types of infill development that can occur.

For example p. 323 of the Dublin City Council Development Plan (2017-2022) demonstrates the restrictive nature of the City Council's policies with respect to one bed apartments in

particular. For developments which contain 25-50% 1 bed apartments the following condensed conditions are in place:

- Can be build to let only
- Can only be in certain locations
- Must remain in single ownership for 20 years
- Applicants must demonstrate that there is not an over concentration of 1 bed apartments already in these locations

This level of prescriptive conditioning by the development plan makes meaningful and sustainable densification of pre-existing urban areas less achievable. New guidelines and standards may have to be more detailed in how smaller infill development can take place in pre-existing residential settlement (*such as side-plots or gardens, granny flats/ancillary buildings, garage conversions, or studios*). In sections 6.0 and 7.0 we demonstrate how targeted strategies of infill must take place based on evidence, and on the need to provide a mix of dwelling types in order to consolidate and foster sustainable urban development.

6.0 Sustainable locations of appropriate scale

6.1 We strongly support the objective to provide an additional 550,000 homes by 2040 as set out in National Policy Objective 37;

“Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.” (p. 87)

In our view the emphasis should firmly be on building new infill development schemes, area or site-based regeneration and increased building heights, in the identified low density EDs in Fingal, South Dublin County Council, and Dun Laoghaire - Rathdown County Council areas.

6.2 We note the above range of measures and are of the view that each Local Authority should provide a breakdown and strategy of what measures they will implement. This may allow for more focus and attention on infill development, site-based regeneration and increasing building heights.

We agree with the objective that homes are to be located in areas that will support sustainable development, as pointed out;

“Places which support growth, innovation and the efficient provision of infrastructure, are accessible to a range of local services, can encourage the use of public transport, walking and cycling, and help tackle climate change.” (p. 86)

6.3 The location of homes along public transport is crucial in order to create and deliver sustainable cities. The research undertaken demonstrates that infrastructure is underutilised and that these areas have significant potential for additional housing at increased densities. The development of these opportunity sites at higher densities is necessary to deliver the accommodation that is required for the future growth of Dublin City and County.

7.0 Housing

7.1 In order to supply the additional housing needed, we support the suggested approach of providing a range of housing types to allow people to live all stages of their lives within a single (sustainable) urban community if that is their preference. This will require a much more diverse range of housing types in many suburbs of Dublin than can currently be found. The DIT Planning Study suggests that the limited range of housing stock (i.e. 3 and 4 bedroom houses) is preventing these areas from accommodating persons and families of all age groups within a single area and suppressing housing density across the Dublin City and County.

7.2 We are strongly in favour of the proposal to require Local Authorities to record much more detailed housing data and engage in improved data gathering, projections, and understanding of the housing stock in their areas of jurisdiction. The information recorded should also include;

- Dwelling size
- Dwelling type
- Dwelling condition
- Occupancy

7.3 However, we recommended that this data should be recorded down to the ED level and/or character areas based on ED's. This should influence Development Plan policies on what type of housing is permitted within an ED, and what should be refused. For example, if an ED is comprised of a very high percentage of 3 and 4 bedroom dwellings, Local Authorities should insist on additional housing to be 1 and 2 bedroom apartments/small houses in order to diversify the housing mix at ED level. Applying a single policy across very diverse ED's (with respect to housing density) is likely to be less effective than a more targeted approach.

This helps develop an evidence base and strategy towards a diverse mix of housing types, and where local authorities should be targeting measures to assist infill development.

7.4 Occupancy as previously stated is frequently very low in Ireland. Often 1, 2 or 3 individuals per home can be found in units with 3-4 bedrooms or more. 7 out of 10 houses in Ireland fit this description, and it rises to 80% for Dublin. (p. 88)

The average occupancy we have found for Dublin City and County is 2.68. With 47 out of 322 EDs showing an average of 3 or above, this makes the *average* occupancy 85% 1, 2 or 3 persons per unit as of 2016. This indicates that housing stock is not in line with requirements and more diversity is needed in the housing stock to provide sustainable options for different life stages and family types.

7.5 Our study has so far revealed the EDs per Dublin city and County Local Authorities that reflect this average, and some that exceed the national average. The following are an example of these results:

Table 7.1.1 Occupancy ratio of Dublin County and Local Authorities

Area	Occupancy Ratio 2016 (People per household)
Dublin County	2.68
Dublin City Council	2.58
South Dublin County Council	2.79
Dun Laoghaire - Rathdown County Council	2.64
Fingal	2.98

Table 7.1.2 EDs with the highest occupancy

Electoral Division	Occupancy Ratio 2016	Local Authority
Ashtown A	9.76	Dublin City Council
Balgriffin	4.43	Fingal
Cherry Orchard A	4.27	Dublin City Council
Mansion House B	3.94	Dublin City Council
Tibradden	3.92	Dun Laoghaire - Rathdown County Council

Table 7.1.3 EDs with lowest occupancy

Electoral Division	Occupancy Ratio	Local Authority
Ashtown B	0.64	Dublin City Council
Firhouse - Ballycullen	1.08	South Dublin County Council
Clontarf West B	1.65	Dublin City Council
Rathmines West B	1.96	Dublin City Council
Rathmines West A	1.96	Dublin City Council

8.0 Proposals

Based on our study, we recommend that consideration is given to including the following proposals in the final NPF;

8.1.0 Minimal densities to be achieved in each of Dublin's Electoral Divisions.

8.1.1 Each Local Authority would have a specific housing density target for each ED (or character areas based on ED's) with higher densities (increase from 20 to 40 units per ha) adjacent to public transport corridors and the city centre.

8.1.2 Infill will be a prime driver of achieving the density required. However, the key to increasing density (by using infill sites) is developing a number of units per site in the form of apartment schemes (suitable for single people or couples of all age groups) and not a single unit in the form of a three bedroom house.

8.1.3 The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities issued by the Department of Environment, Community and Local Government 2015 states that; *"There must be a proportion and variation of the types and mix of apartments"* (i.e. 1/2/3 bedroom) (p. 3/4). Standards need to be reviewed in order to achieve greater density. We suggest that the apartment guidelines with respect to unit mix should be flexible and allow for significantly higher proportions of one and two bedroom apartments in areas where the existing housing stock is dominated by three and four bedroom houses. This proposal is consistent with the draft NPF;

"In Dublin city, one, two and three person households comprise 80 percent of all households. Yet, the stock of housing in Ireland is largely comprised of detached and semidetached houses with three to four bedrooms". (p. 88)

We suggest that in some cases, a ban on permitting new three bed houses (or apartments) should be introduced particularly in areas (i.e. ED's) where more than 80% of existing dwellings are 3+ bedrooms. These areas are simply not conducive to balanced urban communities as they limit the options for first time buyers and people who wish to trade up (or down) and continue to live in the same urban area.

8.2.0 Adaptive and appropriate development of underutilised green space, while intensifying and improving existing parks and recreation areas.

8.2.1 26% of Dublin city is zoned for parks, recreation and amenity space. When it comes to outer suburbs much of this land is poorly defined and has been left behind by developers to eventually be taken over by local community groups, and the local authority.

8.2.2 Some of these spaces are of irregular layouts, poor ground conditions, and have not been landscaped or incorporated into amenity features. Simply put they are unincorporated green spaces of little to no utility to the community.

8.2.3 Where there is a surplus of amenity lands, these open spaces (either in whole or in part) that are located along public transport corridors and within 10 km of the city centres

should be considered for new housing development as a means of providing additional high density housing.

8.3.0 More Development to Take Place in Urban Infill and/or Brownfield Sites

8.3.1 The Draft NPF proposes that Ireland's population will increase by one million people, or around 20% by 2040 allowing the population to reach approximately 5.7 million and is stated in the Draft NPF;

"Ireland 2040 strategy to plan for these anticipated changes is to grow the region's, build centres of scale and ensure more compact and sustainable development" (p. 47).

8.3.2 We suggest that more development of high density housing should take place on brownfield and infill sites in order to allow for low density residential areas to achieve growth targets and more sustainable urban areas to evolve. Map 1.2 identified a series of distance radii emanating out from Dublin City centre. It is recommended that there should be a strong focus on developing brownfield and infill sites within the 2.5 km - 5.0 km radius and the 5.0 km - 7.5 km radius as means of achieving intensification and density.

If you have any questions regarding any aspect of this submission, please contact the undersigned and we would to thank you for the opportunity for making this submission and presenting the findings of our ongoing research project.

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