

Irish Green Building Council Submission
Ireland 2040 – Stage 2

November 2017

The following document is the Irish Green Building Council's (IGBC) response to the Department of Housing, Planning, Community and Local Government on the second public consultation on Ireland's National Planning Framework.

The IGBC was launched in 2011 and is comprised of organisations and businesses from the entire value chain of the built environment. These include educational institutions, professional institutes, NGOs, local authorities, contractors, architects, engineers, energy companies, as well as leading national and transnational companies. A full list of IGBC members is [available here](#).

The Objectives of the Council are to:

- Provide a source of leadership for sustainability and quality in the built environment
- Promote and assist in the provision of credible metrics for measuring progress towards the end goal of sustainability
- Provide a source of resources to companies transitioning their activities towards more sustainable practices
- Be central to alignment of the policies of organisations seeking to achieve sustainability in the built environment

After extensive research and consultation with the industry, the Irish Green Building Council has developed the **Home Performance Index (HPI)** label to encourage quality and excellence in the development of new homes and communities. The HPI certificate demonstrates that the home has been designed and constructed with care to minimise environmental impacts, ensure low running costs and enhance the health and wellbeing of the occupants. It includes 28 indicators that directly or indirectly impact planning, quality of life and climate change. The HPI is supported by the Environment Protection Agency, under the Green Businesses Scheme.

In this submission, the Irish Green Building Council offers general comments on various key areas within its remit of providing leadership in the transition to a sustainable built environment.

1. The Irish Green Building Council welcomes the new version of the strategy. The document clearly identifies the challenges we are facing and provides a clear and positive vision for Ireland's future.

Housing in Ireland has often taken on a dispersed and fragmented character. This has had a negative impact on our environment, people's quality of life and has made it costly and often unfeasible for the state to align and invest in infrastructure delivery.

As such, the IGBC welcome the emphasis on the need to revert sprawling tendencies and stagnation of inner cities, and to offer more sustainable choices and options to people. Building at higher densities makes more efficient use of land and energy resources, creating a consolidated urban form which fosters the development of compact neighbourhoods and a critical mass which contributes to the viability of economic, social, and transport infrastructures. This is key in supporting our transition to a low-carbon circular economy and is critical to Ireland's attractiveness and competitiveness.

2. Historically, the lack of coordination between policies designed and implemented at different levels, and the fragmentation of the decision-making process have, directly or indirectly, contributed to disperse and fragmented settlement patterns in Ireland.

The IGBC hence welcomes the move towards a better connection between national, regional and local initiatives. This is key as the existing administrative boundaries of our cities now fail to reflect the reality of their contemporary housing and labour markets. Likewise, the publication of the National Planning Framework (NPF) along with a ten-year National Investment Plan (NIP) is a much welcome development which should allow for a better integrated cross-departmental approach. Finally, the IGBC is delighted to see that the NPF will have legislative backing and that its implementation will be overseen by the new Office of the Planning Regulator.

However, all these developments must be implemented and monitored carefully.

3. The IGBC welcomes the recognition of the need to integrate environmental considerations into land use planning in a way that responds to the sensitivities and requirements of the wider natural environment. Many of the environmental challenges we face are indeed related to poor planning. E.g. the residential and transport sectors currently account for 29.9% of Ireland's greenhouse gases emissions, with negative impacts on people's health and wellbeing.

Yet, the strategy should not only be about limiting the potential negative impacts of development, it should be about having a net positive impact on our environment and on people's quality of life. Our planning system can and must play a significant role in improving current and future generations' quality of life, while tackling environmental issues such as climate change and habitats loss.

4. This vision for Ireland 2040, as well as the target for most people to have no more than a 30-minute commute time to work, are highly welcomed. However, it is no longer sufficient to talk about this in vague terms. Measurable goals and measurement indicators are needed. This would provide all players with certainty on the long-term direction – thus creating the right conditions for investments - and allow regular tracking of progress.

The indicators developed under the Home Performance Index could be used to assess all proposed developments, thus improving the quality of our built and natural environments.

HPI Categories include environmental, social and economic aspects of sustainability as well as sustainable location and quality assurance. The Sustainable location category measures how well a dwelling relates to existing transport infrastructure and the accessibility of amenities, thus driving demand for development located in more compact areas. The Environmental category contains indicators that measure the ecological footprint of the development. This includes indicators for global warming potential, residential density, waste management, surface water run-off, quantity of land consumed and loss of biodiversity.

A copy of the HPI technical manual can be [downloaded here](#).

5. The IGBC welcome the new emphasis on renewing and developing existing built-up areas, including under-utilised parts of our cities and towns. In fact, the decisions made now about land use will have a long-term effect on the ability of citizens to live sustainable lifestyles in the future.

However, we feel the plain contains various contradictions in relation to that specific objective.

Given the extremely sprawl pattern of development of Irish towns and cities, the objectives of delivering at least 40% of all new homes nationally, 50% of all new homes in the 5 cities, and 30% of all new homes in other areas within the built envelope of existing urban areas is very low. The IGBC is concerned that these low targets could undermine the whole strategy. For larger towns and cities, a long-term target of 0% development outside the built envelope of existing urban areas, including immediately adjoining suburban areas, is suggested.

The authenticity of Ireland's clean, green image is rooted in the landscape of rural Ireland. However, p. 67, the document states: "At a local level, it will be necessary for the core strategy of county development plans to account for the demand for single housing in the countryside". Given the very dispersed nature of settlements in Ireland and the importance of our unspoilt landscapes to tourism, we believe that we should be extremely careful with this wording and we suggest the meaning of the sentence is clarified.

6. The IGBC welcome the overall objective of promoting compact growth in our cities, small town and villages, and of better using underutilised land. However, a holistic approach to compact growth is required.

The IGBC is delighted to see that in urban areas general planning and related standards in relation to building height and car parking may be replaced by performance based criteria appropriate to general location. This holistic approach is much needed and could be supported using some of the HPI indicators at planning and procurement stages.

There is increasing level of demolition taking place. Where demolition is proposed calculation of the environmental and embodied impacts should be requested to ensure that it is justified on environmental grounds. New Development needs to justify large scale demolition of existing buildings based on lifecycle carbon not just operational carbon. IGBC has facilitated this by the development of [EPD Ireland](#) and the promotion of Life Cycle Assessment. However, it does not make sense to apply this where low-density housing with poor occupancy density are replaced with high quality, higher occupancy housing close to public transport. Where the embodied impacts of demolition are clearly offset by better land and energy use, there should be no issue with demolition.

The “smart growth” funding initiative is a much-welcomed development. Used in conjunction with EIB and / or ERDF funding it could be helpful in renovating existing neighbourhoods. As two-thirds of our existing properties are likely to be standing in 2050, this may also be an excellent opportunity to retrofit our existing building stock – Please [click here](#) for further recommendations on that topic.

7. Current suburban development makes poor use of land. Reduction in household size also means the occupancy density of these suburbs is falling. This in turn makes the provision of vital infrastructures such as schools and public transport even more challenging. Active land management must hence be extended to these areas to make services provision viable, protect our environment and ultimately improve people’s quality of life.

Redevelopment of low density housing and poor quality open spaces must be encouraged. For instance, the option to vertically extend semi-detached or terraced housing by up to two floors and subdivide them horizontally could be explored. Removing the roof, adding a concrete or CLT floor and using this as a platform to construct an additional apartment is one scenario that would achieve both the retrofitting (energy efficiency) and the densification on a single development. The additional unit could pay for the entire cost of the development. The great energy renovation challenge offers an opportunity to remake, adding density, modern design and character to the Irish suburbs. Another interesting case study is the transition from one storey suburban homes for large families to dense multi-storey apartment blocks for a changed demographic of smaller families made by the Colombian city of Medellin in just two decades - This was largely driven by land area based property taxes.

Regarding open spaces, the focus should be on quality rather than quantity. In many suburban areas there are excess areas of open spaces, including playing pitches, with poor spatial and ecological quality. Metrics should be used to improve biodiversity within existing neighbourhoods. Support for urban agriculture should also be considered.

Site value taxes, capital gains exemption or taxes based on area of land occupied could all be used to drive more efficient use of land, more quickly.

8. As dispersed and fragmented settlements are the cumulative result of individual stakeholders’ actions which interplay and aggregate up over time and space, the strategy should act on both the push and pull factors of urban sprawl.

In Ireland, there is a perceived higher quality of life in the commuter belts when measured against concerns related to anti-social behaviour, traffic, or access to some services in urban areas¹. However, the examples of [Paris](#) or [Copenhagen](#)² show that higher density developments can be associated with high quality of life. The need for an absolute minimum of half a million new homes by 2040 presents a unique opportunity to build more dense, high quality sustainable developments.

How we “make” places can have a huge influence on people’s health and wellbeing. The indicators developed as part of the [Home Performance Index](#) provide a simple way of measuring and improving the quality of sites and development.

¹ Dublin Chamber of Commerce, Dublin 2050 – October 2017. Available at <http://www.dubchamber.ie/docs/policy-reports/a-vision-for-dublin-2050-lores.pdf>.

² Mick Forde Bradley, Focus on the future of homes and cities, presentation delivered in Dublin on 26th October 2017 at the Better Homes 2017 conference.

The Sustainable location part of the tool measures access to amenities, alternative transport and services such as schools, healthcare, public parks and sports facilities. It could be used to measure how development improves access to amenities by creating greater permeability in urban neighbourhoods. We also suggest setting a target for all existing urban areas to reach the HPI “walkable neighbourhoods” criteria. This would focus measures to address density and amenities in existing areas thus using redevelopment as a means of regenerating neighbourhoods and improving quality of life.

While our population is ageing and the average household size reducing, using this type of tools could reduce elderly citizens’ isolation and encourage people to make more active, healthier choices.

9. Many of the environmental changes associated with fragmented and dispersed settlements result from the use of impervious construction materials. Impervious surfaces increase precipitation runoff and erosion, and alter the hydrology of the local watersheds. These impervious surfaces replace vegetation, fragment habitats and alter the terrestrial water cycle. The IGBC thus welcome the importance given to waste water management, flood risk planning, but also ecosystems and biodiversity.

As the rate of soil sealing is high we recommend introducing an annual target for maximum permitted area consumption of green field sites as per Germany. Another option may be a tax on soil sealing as already implemented by several German municipalities and currently explored in France. This would ensure a clear focus on maximising development within existing underdeveloped built up areas.

A complete review of poor quality open spaces in urban areas, including underutilised playing fields, should be undertaken. While some of them may be considered for development (see 5), this would also be an opportunity to focus on quality as opposed to quantity and to see how ecological value of these spaces could potentially be enhanced.

10. Planning for better quality, more sustainable, homes and neighbourhoods is not only good for the planet, it is good for people and makes economic sense. The requirement to build half a million new homes and the renovation of the existing building stock present unique opportunities to improve Ireland’s attractiveness and competitiveness, and to transform our construction sector into a global leader in quality and sustainability.

11. Provisional data suggest 2017 is set to be one of the hottest three years on record. Climate change is happening, and this should be reflected in the strategy. Given buildings lifespan, we suggest applying modelling for 3 °C rise in temperature to see how it impacts all new developments.

12. The IGBC welcomes the comprehensive consultation process that has been designed by the Department and the importance given to the implementation phase.

While consumer preferences and market forces contributed to disperse and fragmented settlement patterns, they did not operate in vacuum. Consumers `choice has for instance been supported by public policies favouring new build green-field. Against this background, it’s clear that a broad variety of stakeholders should be involved in implementing the strategy.

We recommend that an open and collaborative approach is taken for the implementation of the strategy to provide key stakeholders with opportunities to engage. As continuous improvements will be needed to address weaknesses and to keep up with best practices, the ongoing strategy process should be smart and adaptive. This could for instance be

achieved through central coordination and the setup of a collaborative implementation platform.

Finally, as the only way to tackle these challenges is alignment of all activities, it may make sense to increase citizens' engagement. In fact, citizens should be empowered and feel part of the solution. However, citizens must first be equipped with the right information to make informed decisions. For new homes, the HPI can provide homebuyers and home occupiers with relevant information in terms of accessibility (public transports and amenities), energy, water uses, etc.