



To: An Bord Pleanála  
Directors of Services for Planning for each City and County Council

cc: Chief Executives, City and County Councils  
Senior Planners, City and County Councils  
Directors of Regional Assemblies  
Office of Planning Regulator

**Circular Letter: NRUP 02/2021**

21 April 2021

**Residential Densities in Towns and Villages, as set out in Guidelines for  
Planning Authorities on *Sustainable Residential Development in Urban Areas*  
(2009)**

A Chara,

I am requested by Mr. Peter Burke, T.D., Minister of State for Local Government and Planning to bring the following to your attention with regard to the on-going application of residential densities in towns and villages, further to ministerial guidance issued under Section 28 of the Planning Development Act 2000 (as amended).

This purpose of this Circular is to provide clarity in relation to the interpretation and application of current statutory guidelines, in advance of issuing updated Section 28 guidelines that will address sustainable residential development in urban areas, later in 2021. It is considered important to address this matter in the context of both the need for significantly increased and more sustainable housing supply throughout Ireland, and national recovery from the Covid-19 pandemic.

As you are aware, statutory 'Section 28' guidelines for planning authorities on *Sustainable Residential Development in Urban Areas* (the 'Sustainable Residential Development Guidelines'), were issued in 2009, with a companion *Urban Design Manual* also published as a best practice document. Further, related and overlapping guidelines were issued subsequent to the Sustainable Residential Development Guidelines in the form of updates to the *Sustainable Urban Housing: Design Standards for New Apartments* (the 'Apartment Guidelines') most recently in 2020, and the *Urban Development and Building Heights Guidelines for Planning Authorities* (the 'Building Height Guidelines'), in 2018.



Central to the underpinning of Project Ireland 2040, which comprises the National Planning Framework (NPF) and the National Development Plan (NDP), is the alignment of spatial planning and public investment to support the delivery of housing, jobs and infrastructure required for projected population and economic growth to 2040. A key shared outcome of the NPF and NDP is the compact growth of cities and towns of all sizes so as to add value and create more attractive places in which people can live and work. The preferred approach is to focus on greater reuse of previously developed ‘brownfield’ land, consolidating infill sites, which may not have been built on before, and the development of sites in locations that are better serviced by existing facilities and public transport. The NPF also acknowledges that there is a need for more proportionate and tailored approaches to residential development. This means that it is necessary to adapt the scale, design and layout of housing in towns and villages, to ensure that suburban or high density urban approaches are not applied uniformly and that development responds appropriately to the character, scale and setting of the town or village.

As such, it is highlighted that in certain locations, particularly at the edges of towns in a rural context, more compact forms of development may include residential densities at a lower level than would be considered appropriate in a city or large town context. As set out below, current statutory guidance is already sufficiently flexible to facilitate greater variation in residential density at such locations.

Accordingly, this Circular clarifies the application of the Sustainable Residential Development Guidelines to ensure that when carrying out their planning functions, An Bord Pleanála and Planning Authorities apply a graduated and responsive, tailored approach to the assessment of residential densities in *Peripheral and/or Less Accessible Urban Locations*, as defined in the Apartment Guidelines and as they apply to towns of all sizes, to ensure that such places are developed in a sustainable and proportionate manner.

## **Development at the Edge of Larger Towns**

Section 5.11 of the Sustainable Residential Development Guidelines states that for Outer Suburban/‘Greenfield’ sites within cities and larger towns, the density of development should be in the general range of 35-50 dwellings per hectare<sup>1</sup>. Section 5.11 of the guidance also states that development at net densities of less than 30 dwellings per hectare is generally discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares.

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<sup>1</sup> All densities referred to are ‘net’ values. See Section Appendix A of the Sustainable Residential Development Guidelines for further definition.



Section 5.12 further notes that to facilitate a choice of housing types, limited provision may be made for lower density schemes provided that, within a neighbourhood or district as a whole, average densities achieve *any* minimum standards recommended above.

While the Sustainable Residential Development Guidelines clearly encourage net densities in the 35-50 dwellings per hectare range within cities and larger towns, net densities of 30-35 dwellings per hectare may be regarded as acceptable in certain large town contexts and net densities of less than 30 dwellings per hectare, although generally discouraged, are not precluded in large town locations.

These 'outer suburban' provisions apply to cities and larger towns, and the Sustainable Residential Development Guidelines define larger towns as having a population in excess of 5,000 people. Large towns therefore range from 5,000 people up to the accepted city scale of 50,000 people. Given the very broad extent of this range and variety of urban situations in Ireland, it is necessary for An Bord Pleanála and Planning Authorities to exercise discretion in the application and assessment of residential density at the periphery of large towns, particularly at the edges of towns in a rural context.

Accordingly, the full range of outer suburban density, from a baseline figure of 30 dwellings per hectare (net) may be considered, with densities below that figure permissible subject to Section 5.12 of the Sustainable Residential Development Guidelines. It is also clarified that in certain circumstances, the neighbourhood or district referred to in Section 5.12, may comprise a significant portion of a rural town.

### **Development within Small Towns and Villages**

Small town and villages are defined within Section 6.0 of the Sustainable Residential Development Guidelines as those with a population ranging from 400 to 5,000 persons. Section 6.11 of the Guidance provides a more clearly graduated approach to the application of densities within such locations, namely:

- Centrally located sites: 30-40+ dwellings per hectare;
- Edge of centre sites: 20-35 dwellings per hectare;
- Edge of small town/village: 15 - 20 dwellings per hectare.<sup>2</sup>

Section 6.0 of the Sustainable Residential Development also notes the difficulty in applying prescriptive density standards in locations that display a variety of contexts and land uses, such as those that can be found in towns and villages that have evolved

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<sup>2</sup> Provided such lower density development does not represent more than about 20% of the total new planned housing stock for the particular town/village.



organically over hundreds of years. The guidance cautions against large scale, rapid development that may overwhelm and detract from the quintessential character of towns and villages that have developed slowly and organically over time (refer to Section 6.3). There is already clear scope for greater variation in density in smaller towns, but this should not lead to provision for disproportionate development in such places through excessive zoning.

## **Building Height Guidelines**

Specific Planning Policy Requirement (SPPR) 4 of the Building Height Guidelines cross-references the application of residential density:

### **SPPR 4**

It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;
2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and
3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.

The Guidelines referred to in Point 1. above, are in fact the Sustainable Residential Development in Urban Areas (2009) Guidelines, as referred to in this Circular. It follows that discretion may be applied in the assessment of residential density at the periphery of larger towns, with net residential densities below 35 dwellings per hectare permissible in certain cases, as set out above. Accordingly, ‘minimum’ densities should *not* be equated with 35 dwellings per hectare in all contexts, and may be lower than that figure.

## **Forthcoming Sustainable Settlement Guidance**

While the principles, approaches and general requirements of the Sustainable Residential Development Guidelines continue to be applicable to the objectives of the



NPF, namely the development of compact, sustainable and liveable settlements, these are in need of review, given the renewed emphasis that the NPF places on tailored, planned and design-focused compact growth.

It is therefore timely to look towards a practical and targeted guidance update, to address various factors that have arisen since the initial application of guidance and on reflection of recent practice over consecutive development cycles, to include, but not limited to the following:

- Responding to context by more effectively defining settlement hierarchies (cities, towns and villages) and place typologies (centres, inner neighbourhoods, outer suburbs, smaller settlements);
- Linking development criteria and standards to differing settlement hierarchies/place typologies, where appropriate, to enable more tailored design solutions in response to character/place setting;
- Greater utilisation of urban design frameworks/masterplans in order to promote more responsive and quality-led design solutions.

These issues, along with others, will be considered in detail in the context of 'sustainable settlement' guidance, to be published later this year, as an update of the Sustainable Residential Development Guidelines. This will be subject to stakeholder consultation. Please contact Mr. Jason Taylor, Planning Adviser, should you have any queries about this area of work at this stage.

In conclusion, towns and their contexts are clearly not all the same, and planning policy and guidance are intended to facilitate proportionate and tailored approaches to residential development, including the flexible application of residential density considerations further to current statutory ministerial planning guidelines.

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**Paul Hogan**  
Principal Adviser/Chief Planner  
Department of Housing, Local Government and Heritage