

Department of Housing, Planning and Local Government,  
Forward Planning Section,  
Room 1.71,  
Custom House,  
Dublin, D01 W6X0.  
[forwardplanning@housing.gov.ie](mailto:forwardplanning@housing.gov.ie)

Date: 18<sup>th</sup> January 2018

Dear Sir/Madam,

**RE: DESIGN STANDARDS FOR NEW APARTMENTS - GUIDELINES FOR PLANNING AUTHORITIES - DRAFT UPDATE (DEC. 2017)**

**1.0 INTRODUCTION**

- 1.1 We refer to the publication of the Design Standards for new Apartments – Guidelines for Planning Authorities – Draft Update (December 2017), which invites submissions from interested parties until **Thursday 18<sup>th</sup> of January 2018**. Please accept this letter as a formal response to the consultation process.
- 1.2 Glenveagh Properties Plc, F11 Maynooth Business Campus, Maynooth, Co. Kildare, W23 HR64 has instructed John Spain Associates to prepare this submission on their behalf.
- 1.3 Glenveagh Properties Plc requests that they are facilitated in attending the workshop which is to take place on the 26<sup>th</sup> of January 2018.
- 1.4 At the outset, our client welcomes and supports the publication of the update to the Apartment Guidelines, which when adopted will provide a greater flexibility in the construction of much needed apartments in urban areas, while at the same time safeguarding the amenity and standards for future residents of apartment developments.
- 1.5 Glenveagh Properties are of the view that the updated guidelines will (subject to the proposed amendments) provide the context for the planning process to play its full part in ensuring that economically viable schemes can be delivered whilst maintaining a quality living environment for occupants. The status quo in relation to the current guidelines will result in apartments not being constructed in the necessary scale and numbers in the correct locations within the major urban centres and towns.

Managing Director: John P. Spain BBS MRUP MRICS ASCS MRTPI MIPi  
Executive Directors: Paul Turley BA MRUP Dip Environmental & Planning Law MIPi Rory Kunz BA (MOD) MScERM MAT&CP Dip EIA Mgmt. MIPi

John Spain Associates Ltd. trading as John Spain Associates. Directors: J. Spain, S. Spain.  
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- 1.6 The content of the guidelines has been reviewed by our Client's technical development and design team. The purpose of this submission is to propose some additional alterations to the Draft Apartment Guidelines, which the development and design team of our client considers will assist in the delivery of apartments in our cities and towns.
- 1.7 Glenveagh Properties Plc are seeking the following to be taken into account in respect of the adopted guidelines:-

### SUMMARY OF KEY POINTS OF SUBMISSION

- Glenveagh consider that the adopted guidelines should recognise that >45 units per hectare is not always appropriate and that "*Intermediate Urban Locations*" should not be construed by decision makers as a minimum target for net densities for **non-apartment** type developments.
- Glenveagh welcomes the reduction in the minimum studio size from 40 sq. m to 37 sq. m as set out in **Specific Planning Policy Requirement no. 3**.
- Glenveagh support the introduction of the 2 bed 3 person unit measuring a minimum size of 63 sq. m
- Glenveagh recommend an amendment to the draft Guidelines to omit the 10% limit to 2 bed 3 person dwellings for private apartment schemes to allow for greater choice within developments.
- Glenveagh are seeking the removal of the requirement for the majority of apartments to exceed minimum apartment sizes by 10%.
- Glenveagh are not in favour of the inclusion of **Specific Policy Requirement no. 5** which seeks to amend minimum floor to ceiling heights at ground and upper floors as the current 2.4m floor to ceiling height is more than adequate.
- Glenveagh support the inclusion of **Specific Planning Policy Requirement no. 1** in relation to the inclusion of up to 50% one-bedroom or studio type units (with no more than 20-25% of the development as studios) and that there will be no minimum requirement for apartments with three or more bedrooms within schemes.
- Glenveagh are in favour of a wider application of 33% minimum dual aspect apartment ratios to all urban areas.
- Glenveagh welcome the increase to a maximum of 12 apartments per core.
- The proposed changes for the elimination or reduction of car parking in central locations is welcomed by Glenveagh. Greater flexibility for car parking provision to encourage '*empty nesters*' to move to apartments should be encouraged.
- Glenveagh Properties request the Department to address the issue of height in the adopted guidelines so that sufficient clarity can be provided to designers and developers and facilitate the accelerated delivery of much needed dwellings in our cities and towns.
- Glenveagh welcomes the ability to calculate basement storage in the overall calculations, but considers that the 50% limit is overly prescriptive and not required.

- Glenveagh support the inclusion of specific '*Build To Rent*' (BTR) and shared accommodation sectors guidance in the Draft Apartment Guidelines and is in favour of compensatory offsets in the provision of communal open space where internal communal floorspace is provided.
- The adopted Apartment Guidelines should include a reference for Development Plans/LAPs to avoid specifying particular locations where build to let or build to rent projects (as well as shared accommodation) will be considered in preference to other locations and to avoid limiting their consideration to locations within specified distances of public transport locations.
- Glenveagh are not in favor of paragraph 6.11 of the Draft Guidelines which seeks the inclusion of long term running and maintenance costs with a planning application.
- Request confirmation in relation to the wording of the adopted guidelines in relation to Part V as not being applicable to both Student accommodation and shared accommodation/build to rent.

## **2.0 GROUNDS OF SUBMISSION**

- 2.1 As highlighted in Section 1 above, our client is supportive of the broad content and intent of the Draft Guidelines and this submission is focussed on the technical aspects of the document.
- 2.2 Our client welcomes the over-arching objective of eliminating anomalies in policies relating to apartments and aligning the standards across planning authority areas which will provide a greater degree of efficiency in the design process.

### **2.1 General Locational Considerations on Density**

- 2.3 The identification of locations in towns and cities that may be suitable for apartment development and the inclusion of broad proximity and accessibility considerations is welcomed. The identification of areas suitable for apartments in the new guidelines should remove the anomaly of where some Local Area Plans discourage apartment development, and is welcomed in this regard.
- 2.4 However it is important to note that on large and complex sites that there are other constraining factors such as proximity to protected structures as well as environmental factors which in combination would make the broad > 45 units per hectare net, difficult to achieve. The prevailing character of an area is also a factor in the density. Ultimately it is considered that the appropriate density for a site should be design driven and not unduly influenced solely by density.
- 2.5 Glenveagh consider that the adopted guidelines should recognize that in some cases >45 units per hectare is not always appropriate and that the commentary, particularly in relation to the 45 dwellings per hectare in "*Intermediate Urban Locations*" is not taken as a minimum target for net densities for non-apartment type developments.

## 2.2 Apartment Floor Areas

- 2.6 Glenveagh agrees with the proposed changes to the apartment floor areas and Specific Planning Policy Requirement no. 3 which reduces the minimum studio size from 40 sq. m to 37 sq. m.
- 2.7 Furthermore Glenveagh supports the introduction of the 2 bed 3 person unit measuring a minimum size of 63 sqm. However Glenveagh is not in favour of the 10% limit as currently indicated in the draft guidelines and is seeking a change to omit this restriction. Glenveagh consider that it is not appropriate to restrict the new 2 bed – 3 person apartment format. Our client is concerned that the 10% cap will limit unnecessarily the flexibility required and that there should not be undue restrictions. This unit type should not be solely used for Part V units and is capable of being used for all apartment developments.
- 2.8 Glenveagh Properties Plc see the dwelling for 3 persons as contributing to the general demand for starter homes or for other homes for persons trading down or moving to smaller dwellings for particular family reasons. The 3 bedroom dwelling is seen by Glenveagh as an important additional housing format and considers that there is no rationale for any restriction in respect of their provision within apartment developments.
- 2.9 We would highlight that the safeguards regarding internal amenity for the 2 bed 3 person dwelling are confirmed in Appendix 1 and that there is no tangible merit for including the 10% threshold. The inclusion of the 2 bed 3 person apartment will add to and broaden the mix of apartments within developments, allowing for greater choice for future residents. Accordingly our client is seeking the removal of the 10% and respectfully requests that this change is made in the final adopted Guidelines.
- 2.10 Glenveagh Properties is seeking clarity on whether balconies are required for studio apartments and for build to rent apartments and shared accommodation schemes.

## Apartment Sizes

- 2.11 It is noted Paragraph 3.8 of the Guidelines requires that the majority (i.e., over 50%) of units must exceed the minimum apartment sizes by 10%. It is submitted that the minimum standards set out in Appendix 1 (of the Guidelines) are sufficient and will provide for a high degree of residential amenity and that there is no requirement for the additional 10% which adds to design inefficiencies and also costs to new apartment developments. It is considered that there are sufficient safeguards included in the Draft Guidelines to ensure that the future residential amenity of residents is delivered. This will be achieved by a combination of factors such as location, general design, high quality finishes to landscaping and façade treatment.
- 2.12 For the above reasons we urge that the 10% increase to the apartment sizes is not included in the adopted Apartment Guidelines.

## Floor to ceiling heights

- 2.13 With reference to floor to ceiling heights Glenveagh is not in favour of the inclusion of policy requirement no. 5 which seeks a ground floor level apartment floor to ceiling height *“shall generally be a minimum of 2.7m and shall be increased, either*

*at ground level only or in conjunction with all floors in apartment blocks”, and is recommending its removal from the final adopted guidelines.*

- 2.14 It is submitted that the 2.4m floor to ceiling height currently indicated is appropriate and that any internal residential amenity concerns in relation to sunlight should be addressed as part of a daylight/sunlight analysis of the ground floor dwellings. The increase in height of floor to ceiling heights adds (unnecessary) costs to the overall development and impacts on the viability of schemes.

### **2.3 Apartment Mix within Apartment Schemes**

- 2.15 Glenveagh Properties welcomes the proposed changes to the overall mix of developments and the inclusion of Specific Planning Policy Requirement no. 1 which states that apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the development as studios) and that there will be no minimum requirement for apartments with three or more bedrooms within schemes.

### **2.4 Dual Aspect Ratios**

- 2.16 We note the Specific Planning Policy Requirement no. 4 which relates to dual aspect ratios and which specifies the minimum number of dual aspect apartments that may be provided within central and accessible urban locations at 33%. While this overall approach is supported, further refinement should be considered to broaden the 33% minimum dual aspect apartments to all sites.
- 2.17 Glenveagh Properties considers that the high quality design (particularly landscaping) of an apartment scheme should allow for a minimum of 33% of dual aspect apartments in all locations as to artificially place a threshold at 50% has the potential to lead to under-utilised serviced sites within the existing footprint of towns and cities. Having regard to the shortage of housing and the thrust of Government policy to deliver much needed new dwellings, it is considered appropriate that the 33% minimum is provided for in the adopted Apartment Guidelines.

### **2.5 Lift and Stair Cores**

- 2.18 The proposed inclusion of Specific Planning Policy no. 6 which allows the increase of apartments per core to a maximum of 12, is welcomed and supported which will add to the efficiency of the build cost and assist in the viability of apartment development. In this regard a draft worked out example, prepared by OMP Architects, of how this would work is included in Appendix 1.

### **2.6 Car Parking**

- 2.19 The level of car parking provision is a key factor in the sustainability of residential developments and we welcome the proposed changes allowing for the elimination or reduction of car parking in central locations, set out in paragraph 4.16 of the Draft Guidelines, particularly for central and/or accessible urban locations. In addition, JSA support a provision for a reduction in car parking numbers in intermediate urban locations and the application of a maximum car parking standard.
- 2.20 For outer/peripheral locations where there is public transport infrastructure in place or proposed, we recommend that the car parking requirements should not be overly prescriptive and that where it can be demonstrated that there is accessibility to public transport, that the provisions of paragraph 4.16 should be expanded out to outer/ peripheral urban areas where there is public transport infrastructure in place.

2.21 It is also noted that in some instances within city centre and accessible areas with high car ownership, that parking provision is sought by future occupants of apartment schemes. In this scenario an upper limit of 1 space per apartment dwelling could be countenanced and that flexibility is sought, where there is demand for such schemes. This is also relevant in areas where 'empty nesters' are seeking to trade down from large houses to smaller apartments, but would still occasionally use the motor car for transport. In these circumstances there is a need to accommodate car ownership for future occupants even if they are only for occasional use. Where applicants consider it necessary to provide on-site car parking, this should be permissible up to a maximum level set out in the relevant development plan.

## **2.7 Building Height**

2.22 Glenveagh welcomes the signaled move away from inappropriate rigidly applied blanket planning standards/criteria in relation to height and separation distances in favour of performance based standards to ensure well-designed outcomes and urges the timely delivery of guidelines.

2.23 The potential height criteria/ performance based standards may include:

- Proximity to public transport (Train, DART, Luas, BRT and QBCs);
- Quality of design (and landscaping);
- Proximity to town and urban centres;
- Size of site, topography, existing trees;
- No material impact regarding overlooking, overshadowing;
- Visual Impact Assessment.

2.24 Glenveagh Properties Plc consider the new apartment guidelines are a timely opportunity to deliver new guidance on building heights in accordance with the draft National Planning Framework (NPF) as they are integral to apartment type development. Further delays in relation to height policy will have the effect of delaying the design process and viability of schemes. Certainty is extremely important for businesses and in our opinion the lack of clarity on building heights is delaying decision making and ultimately the delivery of new homes.

2.25 Glenveagh Properties respectfully request that the Department addresses the issue of height in the adopted guidelines so that sufficient clarity can be provided to designers and developers and facilitate the accelerated delivery of much needed dwellings in our cities and towns.

## **2.8 Creche/Childcare Provision**

2.26 Glenveagh Properties welcome the removal of studio and 1 bedroom units as a factor in the calculation of the requirement of creche/childcare delivery. It is submitted that since the introduction of the Planning Guidelines for Childcare Facilities in 2001 that the provision of childcare facilities has been transformed and that the standards have improved to more purpose built and generally larger facilities (for viability). We note that the current guidelines (Appendix 2) specify that *"For housing, a benchmark provision of one childcare facility per 75 dwellings is recommended."*

## **2.9 Storage**

2.27 Glenveagh Properties Plc consider that the proposed storage requirements are too prescriptive and flexibility is needed. The inclusion of additional storage has the potential to lead to higher costs and affordability issues for smaller more affordable dwellings. It is recommended that a degree of flexibility should be applied. Glenveagh Properties Plc believe that there is an opportunity to accommodate an enclosed storage area for apartments with large balconies, (and which does not impact on the visual amenity of the façade). This option should be used in calculations for storage while also ensuring that this does not reduce the minimum private open space requirements, set out in Appendix 1 of the Guidelines.

## **2.10 Communal Facilities**

2.28 It is noted that the Draft Guidelines promote the incorporation of internal community meeting rooms or gym uses. Glenveagh Properties are seeking the inclusion of support in the Adopted Guidelines, for the off-set of the quantum of communal open space in apartment developments where internal meeting/community rooms are provided. A similar compensatory mechanism is already provided for in respect of the Build to Rent model as set out in Specific Planning Policy Requirement no. 8 and it is considered appropriate that a similar level of flexibility could be provided in respect of Build to Own model.

## **2.11 Build to Rent**

2.29 Glenveagh Properties welcomes the inclusion of specific '*Build To Rent*' (BTR) and shared accommodation sectors guidance in the Draft Apartment Guidelines but is anxious that the adopted Guidelines are altered to assist in the delivery of such schemes. Our client is in agreement and supports Specific Planning Policy Requirement no. 8 and in particular the flexibility in relation to the storage and amenity space set out in Appendix 1 (of the Draft Guidelines) "*on the basis of the provision of compensatory communal support facilities and amenities.*" For clarity the amenity space should be identified as comprising both private amenity and communal amenity space.

## **2.14 Management Fees**

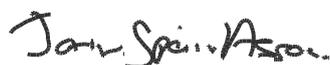
2.30 Our client favours the current generally accepted format whereby details of the management companies for apartments should be continued through a condition rather than the inclusion of long term running and maintenance costs with a planning application as it is considered unduly onerous for planning applications. It is submitted that the management fee is not a planning consideration in the broad context of the delivery of new apartment schemes.

## **2.15 Part V**

2.31 With reference to Part V obligations our client welcomes the acknowledgement that both shared accommodation units and student accommodation units are not suitable for social housing given they are not provided as self-contained residential units.

2.32 We respectfully request the Department to take this submission into account and to include the proposed alterations into the adopted Apartment Guidelines.

Yours Faithfully,



**John Spain Associates**

## **Appendix 1 OMP Layout of 12 Core Arrangement**

## 12 PER CORE TYPOLOGY

### BREAKDOWN (Build to Sell)

- 3 No. (Studios)
- 3 No. (1-beds)
- 5 No. (2-beds)
- 1 No. (3-beds)

GIA: 908 M2  
 NIA: 766 m2  
 Net: Gross: 84%  
 No. of cores: 1  
 No. units: 12  
 Dual Aspect: 4 No. (Ratio: 33%)

- Studio Apartment - (37m2 min.)
- 1 Bed Apartments - (45m2 min.)
- 2 Bed Apartments - (63m2 min.)
- 3 Bed Apartments - (90m2 min.)

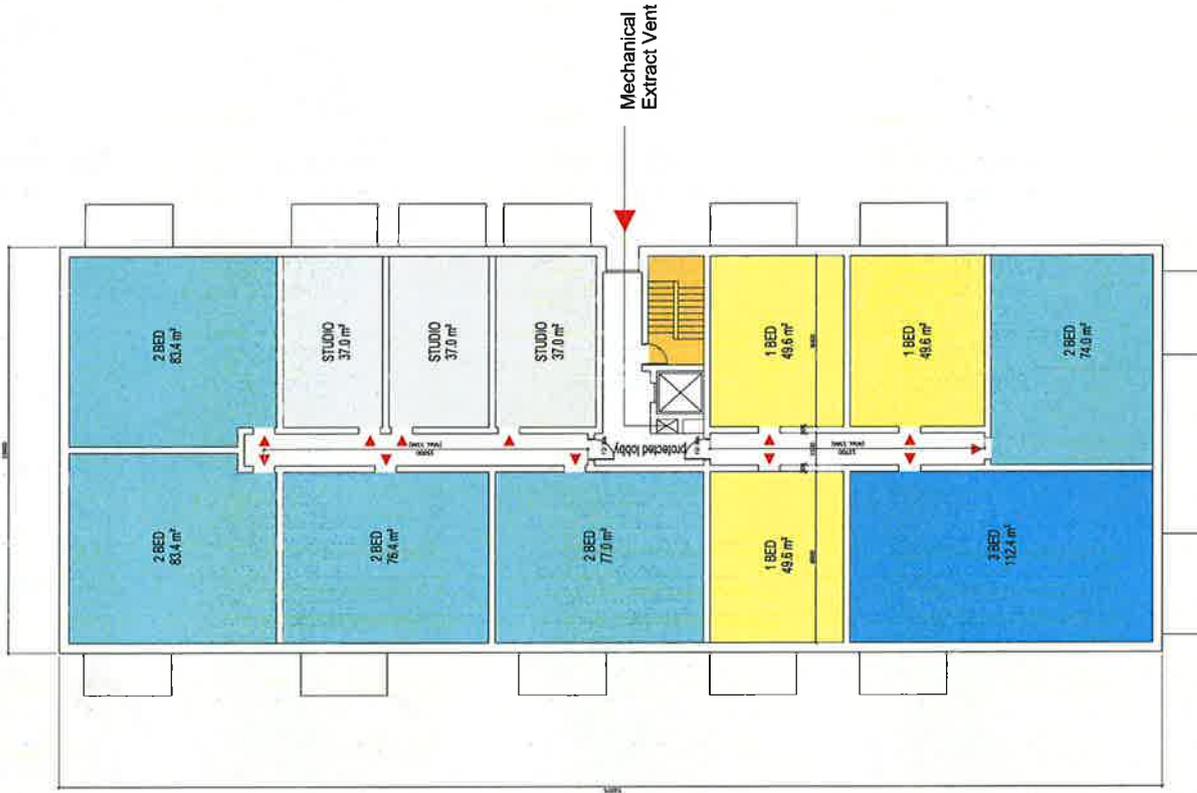
## SPRINKLER SYSTEM (BS 9991)

### DESIGN ASPECTS:

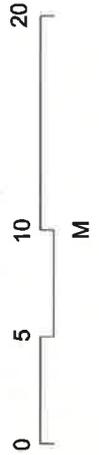
- Open Plan Layout
- Omission of internal unit lobby
- Brighter/spacious design
- More efficient use of space

### TECHNICAL ASPECTS:

- No limit on building height - fire fighting lift shaft or stair in 120 min. fire resisting construction required after 18M height (6-storey) with standby generator and Mechanical ventilation system to escape corridor.
- Dry riser required to all cores.
- Travel distance in escape corridor extended to 15M in 1 direction and 60M with alternative means of escape providing greater efficiencies. Protected lobbies omitted in common escape corridor.
- Unit internal protected entrance hall/ lobby omitted with removal of fire rated elements and self closers.
- Fire stopping of services within unit not required. Apartments designed to BS 9991 as open plan. Residential sprinklers to comply with BS 9251 which can be fed off the domestic water supply and share the cold water storage tank subject to agreement with Local Authority.



Block (12 units per core)  
 OPEN PLAN TYPE



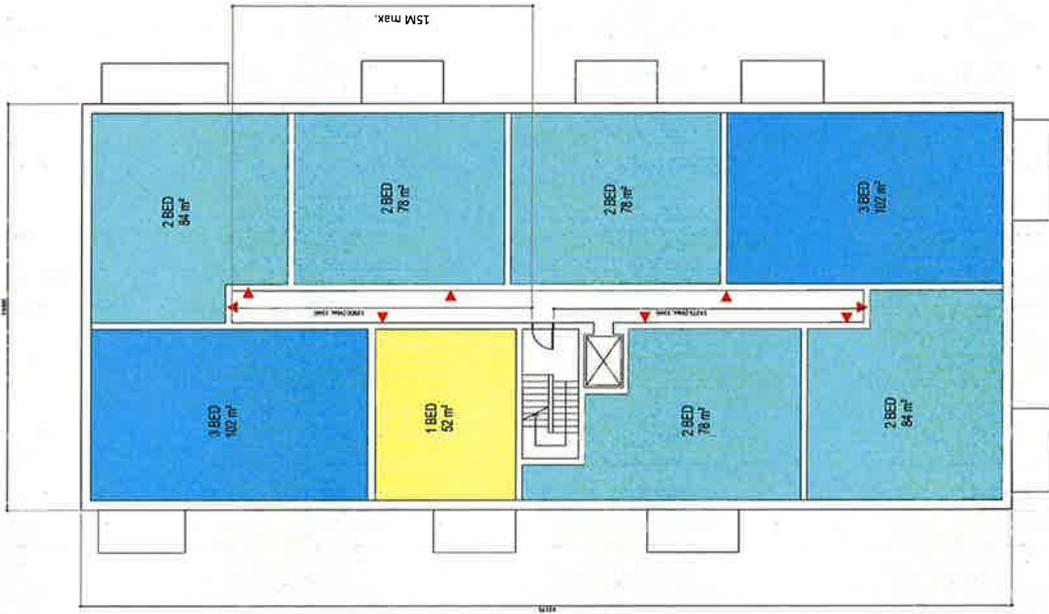
## 8 PER CORE TYPOLOGY

### BREAKDOWN (Build to Sell)

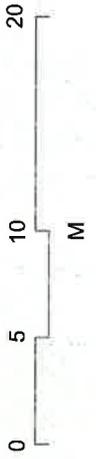
- 1 No. (1-beds)
- 5 No. (2-beds)
- 2 No. (3-beds)

GIA: 765 M2  
 NIA: 658 m2  
 Net: Gross: 86%  
 No. of cores: 1  
 No. units: 8  
 Dual Aspect: 4 No. (Ratio: 50%)

- 1 Bed Apartments - (45m2 min.)
- 2 Bed Apartments - (63m2 min.)
- 3 Bed Apartments - (90m2 min.)



Block (8 units per core)  
 OPEN PLAN TYPE



2015 DESIGN STANDARDS

Apartment Typology Study - 8 per core  
 09th January 2018

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