

## **Re – Consultation on Design Standards for new apartments – draft update December 2017**

Dear Sir/Madam,

Owing to the exceptionally short time period given for public consultation and the fact that this coincided with the pressurised period at Christmas time for planning departments the following comments are short and specific.

The authority in general recognises the acute problems in the housing market and welcomes draft revisions to the apartment guidelines. However it is felt that a more holistic approach to influencing housing, including delivery of apartment developments, should include a broader reach which looks at all the issues raised by SCSi report.

These include site costs, VAT, access to finance, affordability, build costs. The two additional issues re apartment sizes and car parking requirements are the main focus of the guidelines but the conversation regarding delivery challenges should be a cumulative response cross – department as the singular planning perspective is isolated and suggests that market problems are primarily driven by planning legislation and authorities which is not the case.

### **General**

The guidelines include for a number of policy requirements that have been prepared predicated mainly on the characteristics of the Dublin housing market. It is requested that

the standards set out in the guidelines should reflect differences between urban locations and allow for the individual development plans, which are based on local circumstances, discretion to adjust to those circumstances.

The original philosophy of introducing guidelines in 2007 was in recognition of need for standards, a need to comply with the requirements of the building regulations and importantly the need to support quality housing and moreover sustainable communities. This included the objective of fostering good quality, family accommodation in apartment type living environments. This ethos is significantly changed to one more focused on costs and delivery at the expense of creating mixed type communities. This could result in repeating the negatives generated from single format housing accommodated in 3 bed semis with the associated dearth of a mix of household types.

In view of the ambitions of the NPF regarding the promotion of regeneration sites, new communities and good quality urban environment for living, the particular absolute allowances for smaller unit types is likely impact the objectives for community sustainability.

## **Specifics**

### **Section 2**

2.4 Refers to local discretion for determination of suitable sites for apartment development but SPPR1 with regard to discretion for studio /one bedroom negates the capacity of the local authorities to further determine the mix in sizes. Discretion with regard to including a mix of unit types in development plan policy is indicated (based on evidence) but it doesn't seem to override the allowance for an exceptional amount of smaller units.

As research shows and it is not disputed, there is a trend toward reduced household size but not as overwhelmingly radical as the obligatory smaller unit size may suggest. This relates to Galway City – it is assumed that there are other variances in other urban areas that may be distorted by a national statistic which should be adjusted without the overwhelming influence of Dublin and the trend of declining household size owing to depopulation in many rural locations. (see Appendix)

The point here is essentially that a universal rule for one bed/studio for the whole county is not appropriate and more local discretion should be facilitated.

2.22 – In particular SPPR2 Discretion regarding infill small scale re-development is welcome in principle, however the scale of such sites up to (0, 4 /1 acre) is considered too large. This may be a scale appropriate for Dublin but discretion should be allowed for other urban areas to determine the scale of the site. Without this, there will be pressure for sites of this size 0.4ha to circumvent standards supported by the CDP and the guidelines. (This comment relates to all locations where this criterion is repeated in subsequent policy requirements.)

2.23 – Regarding height /building separation GCC have already raised this as an issue in the submission to the NPF and indicated that these standards should be determined in the context of each area/development plan. Generic standards can sacrifice local character and militate against good urban design.

### **Section 3.0**

The introduction of a discretionary category for 3 people / 2 bed apartment size is considered unjustified and over complicated. It will not be feasible to enforce 3 - person occupancy only and it is a standard that can be easily abused in a demand led market. The sustainability of an apartment should be driven by the likely life span /cycle of the building and the capacity for adaptability rather than a standard suitable to social housing construction which in a normal housing market will represent the minority of house construction. The corresponding reduction in storage from 6m to 5m too is unjustified in view of modern standard requirements – and if it is suggested that this format suits a couple and child, it is even more challenging in view of the nature of the size of childcare accessories and children's toys.

3.30 – There are number of references made that express the desirability for apartments to provide communal storage within schemes at ground / basement level. On reflection of built schemes where deficit exists and international schemes that have such facilities and are designed for long term apartment living these criteria should be made obligatory rather than an element for planning departments to “encourage”. It is noted that the research on

*Quality of Life & Dublin Apartments Dwellings* (\* *Quality of Life & Dublin Apartments dwellings in Dublin – Declan Redmond, Mark Scott, Peter Howley 2007*), that the main level of dissatisfaction was recorded in relation to lack of storage (mostly complained about in the smaller units) and noise.

It is appreciated that noise is an area for building regulation but this should be revisited also and benchmarked against long term apartment living in other jurisdictions to assess if current standards reasonably prevent nuisance/pollution. Prevailing standards may be minimum and may reflect the current context of low levels and transient nature generally of apartment living. This element can add significantly to the sustainability of apartment living. Noted also is the benefit of doing research into user groups, it should also be a focus of benchmarking standards in addition to focusing on building providers requirement.

#### **Section 4.0**

4.5 – As per comment above on communal storage, so too should communal facilities – e.g. laundry, gym, winter gardens, party rental space be made an obligatory requirement of schemes above a scale of development threshold. These are included in many modern shared accommodation developments in other jurisdictions where apartment living is more commonplace. In addition, no change of use to exclusive private use of such facilities should be allowed without an evidence based demonstration that they are unused /superfluous.

4.7 - The comments on the obligation for childcare facilities being more discretionary are welcome and is how it is currently operated in GCDP supported by evidence of existing local provision.

4.11 - It is suggested that qualitative elements can be balanced against a likely maintenance cost. The level of maintenance can be a function of good design at concept stage and not a discretionary element bases on scale or arrangements. Notwithstanding this comment, management and maintenance costs are a private arrangement on private schemes and subject to a number of variables independent and not controlled by planning departments.

Inclusion of such comments suggests that qualitative standards can be reduced where a nebulous argument on future costs is raised. It is recommended that this section is reworded/omitted.

4.15 Car parking – the discretion regarding of apartment locations/car parking provision close to high frequency public transportation is noted and is currently provided for in some instances in GCDP. However as GCC are currently at the early stages of implementing the GTS - Transportation Strategy (adopted 2017 – specific schemes to follow) GCC does include in some instances for a development contribution towards public transportation in lieu of a calculation of theoretical car parking demand – this being the measure used to determine level of payment. We would request some modification in wording that would ensure that this situation in the long term is not frustrated and some additional wording is included as central funding (NTA/TII) will not cover all initiatives envisaged. We use this in S.48 and not as special contributions as the in lieu levy relates to city centre and Salthill sites.

4.19 With respect to peripheral locations and car parking it is considered that unlike Dublin, Galway and other regional cities do not have the benefit of a modern high frequency, public transportation system that extends to the suburbs and the prevailing standards (2015) for apartment car parking requirements, in particular 1.5 per unit remain in place.

## **Section 5**

5.1 *Build to rent* – this element of the market needs specific regulation under statute and cannot rely on conditions for legal agreements under planning permission particularly regarding maintenance /management / supporting facilities. The comment regarding a prohibition on applications for change of use of communal spaces (as has occurred with student accommodation for laundry / concierge facilities) should apply equally. Communal storage and supporting facilities should be a requirement not a desirable facility.

5.13 The concept of *shared accommodation* may not be appropriate to all urban areas possible the regional cities only. It may be appropriate too to have this type of accommodation regulated by legislation also. The scale of bedroom size in shared accommodation is similar to that prevailing for current student accommodation but the

nature of the tenant is different - in likely tenancy duration and in the need for storage and supporting facilities. It is considered that less discretion should exist for storage and supporting facilities and where these types of arrangements exist, it would be obligatory to provide a pro rata level of communal storage, sport facilities/lounge/dining room rental etc. This may compensate for minimal bedroom & ensuite sizes.

Again, there should be a wider view taken of this housing need such as more housing initiatives available for young workers and as was discussed by previous governments – for locations with high rents and where workers are often classed as being on ‘graduate programs’/short term contract/ zero hour contracts and paid accordingly, rent relief could be investigated. A more holistic approach needs to apply rather than a single planning regulation response. Affordable accommodation is the objective rather than a lowering of standards. It is not clear either how a reasonable rent rate will be achieved if this type of accommodation is subject to the general rules of supply and demand markets. It is acknowledged that delivery of units is important but equally affordability will be an issue which will not necessarily be resolved by initiatives included in the guidelines.

We would also hope to have a capacity to go to the workshop scheduled for Ennis at the end of the month you might revert with details.

Yours Faithfully,

Caroline Phelan, Senior Planner on behalf of Planning Department Galway City Council

# Appendix 1

Table 9: An array showing projected Persons Per Household Size and associated Minimum Dwellings Required Per Household Size – Scenario 2 and Scenario 3 (2012 – 2026)

Projected Persons Per Household Size															
Scenario 2: Tredinnon M2nF1, 2012-2026															
Person Household Size	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
1 PH	7,092	7,210	7,348	7,497	7,665	7,844	8,035	8,232	8,432	8,636	8,839	9,040	9,237	9,429	9,617
2 PH	17,976	18,268	18,603	18,981	19,399	19,848	20,319	20,806	21,308	21,815	22,320	22,816	23,296	23,766	24,212
3 PH	16,417	16,557	16,738	16,955	17,204	17,475	17,775	18,078	18,389	18,706	19,017	19,220	19,414	19,599	19,764
4 PH	15,028	14,953	14,903	14,854	14,822	14,815	14,822	14,842	14,872	14,904	14,938	14,974	15,012	15,052	15,097
5 PH+	14,348	14,280	14,242	14,211	14,184	14,161	14,142	14,126	14,112	14,100	14,089	14,079	14,070	14,062	14,054
Total*	71,071	71,268	71,826	72,445	73,002	73,555	74,071	74,529	74,925	75,285	75,605	75,885	76,122	76,319	76,481
*Total refers to derived de jure population per annum - as distinct from projected de facto population. See 3.1.1.															
Projected Minimum Dwellings Required Per Household Size															
Scenario 2: Tredinnon M2nF1, 2012-2026															
Person Household Size	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
1 PH	7,092	7,210	7,348	7,497	7,665	7,844	8,035	8,232	8,432	8,636	8,839	9,040	9,237	9,429	9,617
2 PH	8,989	9,124	9,281	9,460	9,669	9,911	10,180	10,474	10,783	11,097	11,409	11,709	11,996	12,271	12,526
3 PH	5,472	5,519	5,579	5,651	5,735	5,825	5,924	6,028	6,136	6,238	6,335	6,428	6,516	6,600	6,671
4 PH	3,759	3,738	3,726	3,721	3,723	3,726	3,728	3,728	3,728	3,728	3,728	3,728	3,728	3,728	3,728
5 PH+	2,910	2,856	2,806	2,766	2,726	2,692	2,658	2,624	2,589	2,552	2,513	2,471	2,426	2,379	2,328
Total*	28,122	28,457	28,759	29,125	29,511	29,911	30,316	30,725	31,128	31,525	31,907	32,274	32,626	32,964	33,279
*Total refers to derived de jure population per annum - as distinct from projected de facto population. See 3.1.1.															
Projected Persons Per Household Size															
Scenario 3: Galwey Centric M2nF1, 2012-2026															
Person Household Size	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
1 PH	7,092	7,214	7,370	7,555	7,765	7,915	8,125	8,343	8,569	8,801	9,035	9,267	9,496	9,726	9,951
2 PH	17,989	18,206	18,464	18,776	19,131	19,519	19,942	20,398	20,886	21,397	21,912	22,411	22,884	23,331	23,752
3 PH	16,432	16,591	16,793	17,036	17,321	17,630	17,970	18,332	18,717	19,094	19,467	19,826	20,167	20,491	20,798
4 PH	15,020	14,985	14,954	14,925	14,892	14,858	14,826	14,796	14,768	14,742	14,718	14,695	14,674	14,654	14,631
5 PH+	14,362	14,289	14,220	14,151	14,082	14,013	13,944	13,875	13,806	13,737	13,668	13,599	13,530	13,461	13,392
Total*	71,127	71,414	71,874	72,507	73,299	74,187	75,126	76,106	77,127	78,180	79,265	80,382	81,531	82,712	83,926
*Total refers to derived de jure population per annum - as distinct from projected de facto population. See 3.1.1.															
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Scenario 3: Galwey Centric M2nF1, 2012-2026															
Person Household Size	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026
1 PH	7,092	7,214	7,370	7,555	7,765	7,915	8,125	8,343	8,569	8,801	9,035	9,267	9,496	9,726	9,951
2 PH	8,997	9,153	9,335	9,550	9,798	10,078	10,375	10,688	11,008	11,316	11,600	11,869	12,123	12,362	12,577
3 PH	5,477	5,510	5,556	5,619	5,704	5,817	5,950	6,108	6,279	6,455	6,619	6,801	6,971	7,121	7,240
4 PH	3,765	3,744	3,726	3,740	3,748	3,761	3,773	3,789	3,810	3,841	3,860	3,876	3,890	3,900	3,908
5 PH+	2,912	2,862	2,812	2,762	2,747	2,736	2,728	2,722	2,718	2,715	2,712	2,710	2,708	2,706	2,705
Total*	28,248	28,516	28,857	29,272	29,752	30,277	30,825	31,404	32,014	32,734	33,449	34,159	34,866	35,561	36,246
*Total refers to derived de jure population per annum - as distinct from projected de facto population. See 3.1.1.															

Provision of Population Projection Services Supporting the Core Strategy, Retail Strategy and Housing Strategy of the Draft Galwey City Development Plan 2017-2023

Extract *Future Analytics* – prepared for City Development Plan Core Strategy 2017-23 GCC highlighting projected household size.

Extract *Future Analytics* – prepared for City Development Plan Core Strategy 2017-23 GCC