

Development Plan Team
Planning & Economic Development Unit
Dublin City Council
Civic Offices
Wood Quay
Dublin 8

16th March 2009

R.E: Submission to Dublin City Council Development Plan

To whom it may concern,

On behalf of the Society of Chartered Surveyors, I would like to make this submission with regard to the review of the Dublin City Development Plan. By way of introduction, the Society of Chartered Surveyors, which dates back to 1895, is the largest professional body in Ireland representing Chartered Surveyors in both the construction and property industries. The Society has strong links with the RICS which represents over 110,000 members across 120 countries worldwide and is one of the most respected and high profile global standards and membership organisations for professionals involved in land, valuation, property, construction and environmental issues.

Representing over 2,200 qualified chartered surveyors and a further 1,000 probationers who are undergoing their assessment of professional competence in order to achieve the gold standard of chartered status, members of the Society are typically professionals employed in the land, property and construction markets through private practice, in central, regional and local government, in public agencies, in academic institutions, in business organisations and in non-governmental organisations. Their broad areas of expertise include:

- Quantity Surveying
- Building Surveying
- Valuations surveying
- Planning & Development
- Geomatics & Land surveying

Members' services are diverse and can include offering strategic advice on the economics, valuation, law, technology, finance and management in all aspects of the construction and property industry.

Accountable to both members and the public, the Society of Chartered Surveyors has five primary roles:

- Promoting the diverse knowledge of the profession
- Maintaining the highest educational and professional standards
- Protecting consumers through strict codes of practice
- Providing expert advice on property and built environment issues
- To act as the State Registration Body for the title of Quantity and Building Surveyor under the Building Control Act, 2007

The members of the Society are involved in all aspects of the property industry employed in planning practices, property development companies, estate agencies, auctioneering practices, and quantity surveying firms amongst others and this submission reflects the views of our members.

This proposed Development Plan will shape the future of Dublin in the medium term, hopefully at a stage when the market will be resolving the current issues and on the road to recovery. The content of this Development Plan is critical in terms of assisting in this recovery, both economically and socially. The main areas of our submission comprise:

- Provision of education facilities in tandem with development
- Incorporation of a legible height strategy for city
- Planning of sustainable communities
- Improving and regenerating city centre areas
- Economic impact of regulatory standards – size of apartments, layouts, etc
- Integration with public transportation
- Planning for the recovery and assisting in delivering new developments
- Estate management
- Provision of community facilities and amenities

For the last decade, Dublin as a city has developed at a phenomenal pace. In many apartment schemes, design plans and specifications have made management of these apartments very challenging. This has impacted on the quality and living standards of many apartment dwellers. The quality of apartments provided to be market in the early/mid 1990's was generally poor, but as the economy improved and strengthened, the market demand for higher standards and more spacious apartments increased. This was also underpinned by increasing the standards and minimum standards of residential accommodation, however we would submit that market demand was the main driver of this overall improvement as developers matched the market expectation.

During this time of exuberant growth, Variation 21 was adopted by the Council. At a time of significant market demand and booming economy, this was no doubt considered a practical and necessary method of improving the residential standard being delivered. However, a changed economic outlook and market now needs to be addressed. I would draw your attention to the impact of Variation 21 on the residential market that has emerged since its inception. While it is based on the presumption of increasing the suitability of apartments for family living, it appears to have had little consideration to the associated costs, both capital and running, with the imposition of these standards. We would submit that there is a lack of evidence to support the concept that ultra-large apartments create a suitable environment for family living but rather that a holistic approach is taken with regard to services, amenities and running costs. Most notably, the enforced design requirements such as dual aspect and minimisation of apartments per lift both increase initial construction costs and predestine the end user to highly inflated service charges.

Our research has calculated that the capital cost of providing a maximum of two or three apartments per floor per core has increased by €12,500 per unit. It also has a negative impact when the feeling of security and safety of the residents is examined. Most residents surveyed prefer more units to be accessed from a core as this means higher trafficked areas, social contact with ones neighbours and a greater feeling of security than sharing a lobby with one other unit. In terms of running costs, the increased annual service charge for residents due to this standard imposition is circa €650 per annum according to research conducted by Corcoran Jennison.

We would respectfully submit that the requirement for a minimum of 2.7m floor to ceiling height should be at the discretion of the developer. Given rising energy costs, this added area will require additional heating and ventilation requirements thereby increasing the running costs of the unit, with no perceived benefit to the resident save a 'loftier' sense of space in the apartment. In a time when sustainability and energy efficiency are increasingly dominating world news and consumer consciousness, this increased height standard seems to be competing with the global shift to lower energy requirements. It also adds unnecessary capital building costs to apartments in a time of stifled demand. We have estimated that this increased head height based on the new area requirements results in an additional average cost of €9,700 per unit which is ultimately passed on to the purchaser.

It is necessary and desirable to increase the quality of residential housing in the capital city and the SCS fully supports this aim. However, as our research as shown, the capital and running costs associated with these new measures are considerable and will serve to undermine the recovery of the residential development market and supply of new housing. It is our submission that the new Plan should re-evaluate these newly adopted measures and determine the minimum requirements based on residential quality but also with regard to deliverability. From our discussions with those in the development market, although planning permission has been received for a number of schemes incorporating these new measures, it is not feasible to deliver these apartments. This is through a mixture of reasons – high site cost, financing issues, but the size and layout of these residential units is also being quoted as a dominant factor in this non-delivery.

The SCS is holding a seminar in late April to discuss the Future of Residential Development in Dublin and would be delighted if you should be interested in attending to hear the views of those actively involved in this market. Our speakers include those involved in residential architectural practices, quantity surveying firms, and management agencies to discuss the problems and issues facing this sector and options for the future.

In relation to other aspects of development, we would submit that on-site management and maintenances offices should be provided in any development containing 40 units or more to coordinate management facilities. Storage for cleaning supplies should be provided as standard in all large apartment schemes to allow for ease of maintenance and these should be included as a requirement in any planning application, in the same manner as crèche facilities.

Estate management as a professional discipline has been largely ignored when planning guidelines are drafted. Design and estate management are not mutually exclusive as one has a huge impact on the other in terms of cost-effectiveness in the medium to long term. The proposed management structures should be detailed to outline the strategy once they are built and occupied. Architectural designs alone cannot achieve liveable, sustainable new apartment homes but must incorporate management strategies. The Housing Impact Assessment could provide this detail in proposed planning applications.

We submit that more detail should be provided on the specific steps to be taken by the Council in relation to tackling the problem of educational disadvantage. In line with the strategy for intensification of areas of the city centre, a potential solution could be the introduction of community/meeting spaces as part of high density schemes. Planning schools is another area which requires additional information on the actual delivery of these aspirations.

We submit that the Development Plan should have a clear strategy on building heights and the proposed locations for taller buildings. As per our previous submission, this should be planned at transport nodes to allow for ease of access and distribution of workers/residents onto public transport systems rather than adding to the already congested streets. The Plan should not be overly restrictive, yet have respect to the character of the central Dublin streetscape. The Docklands area is an obvious choice for higher buildings, yet any development towards the east

should occur after or in tandem with the improvements and provision of infrastructure and public transport facilities. A proactive approach should be taken so that historic problems are not repeated.

Social infrastructure and other support facilities are key to achieving successful housing areas where people will choose to live and, besides the quality of apartments, this includes good parks and play areas, good shopping and other commercial facilities, good schools, a Public Library, leisure facilities, 'safe streets and clean streets' and efficient public transport. The issues are obvious and have been stressed in our consultation; the challenge is the delivery by a range of agencies not just the City Council.

On behalf of our members, there is a general consensus on the requirement to increase the quality of apartments, yet there are diverse methods of achieving this goal. Certainly to enforce minimum standards in terms of the size and layout as currently adopted in the Development Plan will not necessarily deliver higher quality living. Delivering the optimum quality of apartments can be achieved through measures such as the provision of utility rooms, useable balconies, extra storage space, more effective ventilation, energy efficiency, provision of safe play spaces, provision of amenities in the area, increased security, and increasing the quality of the property management services.

Should you require any further information on this submission, please do not hesitate to contact the undersigned. On behalf of the members of the SCS, I hope that you consider this submission of interest. Please let me know if you would like to accept our invitation to our seminar in April as we are confident it will be an interesting insight into the various professional disciplines engaged in residential development in the city.

Yours faithfully

Claire Solon

Chairperson, Planning & Development

Society of Chartered Surveyors