

Submission:

Planning Design Standards for
Apartments: National Planning
Statement

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building homes, improving lives.

Introduction

As the largest construction-led Approved Housing Body and service provider, Respond's vision is that every family and individual in Ireland has access to high-quality housing within vibrant, caring communities. We own or manage over 10,000 properties in all 26 counties, providing secure and affordable housing for over 20,000 tenants. Alongside this we deliver a broad range of person-centred support services designed to help individuals and families reach their full potential.

Respond is committed to working with Government to increase the supply of both social and Cost Rental housing. Through our construction-led model, we continue to develop much-needed homes across Ireland. We currently have approximately 3,000 homes under construction and have delivered more than 6,000 new homes in recent years.

We appreciate the opportunity to contribute to this consultation process on the *Draft National Planning Statement on Planning Design Standards for Apartments 2026*. Drawing on our 43 years of experience working in close collaboration with the State, we have played a significant role in delivering much-needed social and affordable homes in communities across the country. This experience has provided us with valuable insights into the opportunities and challenges associated with housing delivery, including the design and development of apartments, and ensuring that apartment developments meet the long-term needs of society and the well-being of communities.

We welcome and support the Government's objective of increasing supply and improving apartment viability and affordability. However, it is important that long-term quality, sustainability, community well-being and placemaking are not compromised in favour of short-term financial savings.

Respond provide homes for life and our vision is to empower tenants through high-quality living spaces underpinned by strong design principles, that support long term security of tenure, quality of life and well connected, healthy communities. We believe our homes should provide a feeling of safety, security and equality. The design of new homes should promote the creation of multi-cultural, multigenerational and diverse communities. Further, developments should introduce variety in terms of both type and layout of new homes to promote vibrant, successful communities, that reflect the diversity of local housing needs. Therefore life-cycle value of homes, design excellence, sustainability and liveability all need to be considered in the development of new communities.

Apartment Mix

National Planning and Policy Measure No.1 (NPPM 1): *With the exception of social housing developments, social/affordable housing provided for under Part V of the Act of 2000 or Part 7 of the Planning and Development Act 2024, or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.*

While we acknowledge and welcome that social housing developments are an exception to NPPM1, which removes restrictions relating to mix within apartment developments, we align with the RIAI's opposition to single typology apartment blocks. We believe that this compromises the sustainable communities' approach to delivering homes, and the need to supply "larger two- and three-bedroom apartments to accommodate growing, diverse households overtime".¹ Developing schemes of single, small will not meet the needs of changing household demographics in Ireland both now and into the future.

Key to Respond's design approach is designing for longevity and future proofing sustainable and thriving communities. For example, homes and facilities should be suitable for an ageing population and cycles of young families moving into a neighbourhood every 15-20 years. Housing mix, typologies and density should therefore be varied to respond to these changing needs of communities. Flexibility in relation to changing demographics is more easily accommodated with a mix incorporating larger units.

In addition, as a community provider of Early Learning and School Aged Care services, we are concerned that these changes would result in the loss of much needed childcare facilities, as these are determined by the number of 2-bedroom apartments in a scheme.²

Recommendation

All housing developments should be developed in accordance with HNDA's and regard to the mix of unit sizes and types required to support the long-term viability, changing demographics and well needs of the community.

Please see **Appendix 1** which provides analysis from the *Respond Design Guide*, pertaining to apartment sizing, suitability, inclusivity and accessibility.

¹ <https://www.riai.ie/whats-on/news/high-quality-design-is-essential-to-viable-sustainable-housing-and-must-not-be-sacrificed-for-short-term-cost-savings>

² <https://www.rte.ie/brainstorm/2025/0912/1533012-housing-ireland-new-apartment/>

Apartment Floor Areas

National Planning and Policy Measure No.2 (NPPM 2): *The following minimum apartment floor areas shall apply, and statutory plans shall not specify minimum floor areas that exceed the minimum floor areas set out below:*

- *Studio apartment (1 person): 32 sq.m*
- *1-bedroom apartment (2 persons): 45 sq.m*
- *2-bedroom apartment (3 persons): 63 sq.m*
- *2-bedroom apartment (4 persons): 73 sq.m*
- *3-bedroom apartment (4 persons): 76 sq.m*
- *3-bedroom apartment (5 persons): 90 sq.m*

In order to encourage sustainable living and compact growth, there has been a move towards higher density and apartment living in Ireland. This trend will need to continue in order for Ireland to fulfil climate mitigation obligations and remain competitive. It is therefore imperative, that high-quality standards are implemented in high density development. Respond do not support the proposed measures under NPPM 2, that lower internal floor areas and reduce the requirement where a set percentage of apartments in a scheme must exceed the minimum floor area by 10%. Our experience shows that spacious interiors are vital for supporting long-term family living, adaptability and accessibility, all of which are core elements within the homes we provide.

Respond are not able to support proposals to reduce the minimum floor area of studio apartments to 32sq.m. Respond previously worked with Levitt Bernstein Architects to develop an apartment layout addressing the ergonomic challenges of accommodating bathroom provision, bedroom layout and storage in a unit of this size and found that these standards cannot reasonably be met within the proposed studio size.

Respond have illustrated graphically in the attached appendices how a 32sq.m. studio apartment works in terms of layout, illustrating the unsuitability of these units for long term tenure. In addition, the provision of blocks of low-quality single unit studios tend to produce long, corridor-dominated layouts with no area for informal social discourse as this approach is ‘institutional’ by design.

Such units cannot accommodate the needs of persons with disabilities, therefore making them incompatible with Respond’s policy of delivering 20% universally designed homes as part of an inclusive social housing provision.

In addition, analysis by John Moorehead Architect, shows that new 32sq. m. (344sq. ft.) studios, because of their reduced size and single aspect will require significant cooling technology in our changing climate. While convenient, buying air conditioning units is an example of what experts refer to as “maladaptation”, as they will use more electricity and will result in a larger carbon footprint. The costs associated with this cooling demand will also be significant in a small dwelling.³

³ <https://www.irishtimes.com/opinion/2026/07/02/one-in-10-irish-homes-are-at-risk-of-overheating-supermarket-fans-wont-cut-it/>

Recommendations

- Studio apartments should be set at a minimum of 34sq. m. as illustrated in Figure 1, noting that this minimum floor area does not accommodate persons with disabilities or adequate storage
- This NPS retains the same minimum one, two and three bedroom unit sizes from previous guidelines. However, previous restrictions on smaller two-bedroom 3-person units are removed, and a new three-bedroom 4-person unit has also been introduced. We ask that the previous restrictions on smaller two-bedroom 3-person unit sizes are not removed. Studio apartments should be south facing with no restriction on private open space provision.



Figure 1

Dual Aspect Ratios

National Planning and Policy Measure No. 3 (NPPM 3): *A minimum of 25% units within a development are required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this National Planning Policy and Measure.*

Respond aligns with the RIAI's position⁴ against lowering mandatory dual-aspect ratios down to 25%, which is proposed under NPPM 3. Reducing these standards would result in dark, single-aspect apartments that reduce residential amenity and wellbeing. Key to Respond's design approach is

⁴ <https://www.riai.ie/whats-on/news/high-quality-design-is-essential-to-viable-sustainable-housing-and-must-not-be-sacrificed-for-short-term-cost-savings>

maximising true dual aspect apartments to optimise internal daylight and natural cross ventilation and reduce energy use for lighting and ventilation.

Recommendation

The 50% minimum as provided, in the provision of dual aspect ratios should remain. Only larger units within a development with quality private open space provision should be single aspect. Single aspect apartments should only be south facing. Please see **Appendix 2** which provides analysis from the *Respond Design Guide*, pertaining to dual aspect and building heights.

Floor to Ceiling Heights

NPPM 4: *A minimum ground level apartment floor to ceiling height of 2.7m shall apply and statutory plans shall not specify a minimum ground level apartment floor to ceiling height requirement that exceeds 2.7m.*

Proposal NPPM 4, we believe restricts active street frontage and flexibility of ground floor use. Limiting the ground floor to ceiling height does not allow for housing innovation, different typologies, and the arrangement of homes to accommodate shared spaces on the ground floor level. These support community use and allow for an expression at the ground floor elevation for community and support buildings for apartment blocks.

Active frontages, those that generate activity at street level and visual interest in the elevation of apartment buildings, are fundamental to successful urban design. A higher floor to ceiling height at ground floor level has traditionally promoted an active street front and supported connectivity in urban areas with established commercial uses. The ideal is a higher floor to ceiling height at ground floor level capable of accommodating commercial activity and interchangeable community functions, thereby encouraging active frontages and thresholds and social connection.

Higher densities can deliver significant benefits and help sustain surrounding facilities when integrated into attractive, liveable, well-designed and high-quality urban places; a greater ground too floor height provides the flexibility for community, commercial and amenity uses that this requires. Active frontages also create overlooking and natural surveillance, promoting safer public space.

A restricted floor to ceiling height typically results in a bland elevational expression and poor ground floor occupancy rates. There is a strong argument that a higher standard of height and design is required at ground floor level to prevent developments detracting from the streetscape and to promote passive surveillance.

Flexibility is also required for refurbishment and infill schemes in urban areas, to allow new development to relate to the existing elevational heights of our urban towns and communities which traditionally have a higher floor to ceiling height at the ground floor allowing for both commercial and residential use.

Finally, flexibility is needed to facilitate future change of use within Respond schemes. A community-based design approach should allow the ground floor to be adapted over time for commercial, crèche

or community use, ensuring the long-term sustainability of the development and enabling it to contribute positively to the streetscape of the town or urban centre of which it forms part.

Recommendation

The minimum floor to ceiling height at ground floor level should be at least 3.2 metres in height. In urban areas and on building refurbishment schemes or urban infill the horizontal building line and ground to floor ceiling height of the existing streetscape should be considered in all development proposals in the interest of good planning. Please see **Appendix 2** which provides analysis from the *Respond Design Guide*, pertaining to floor to ceiling heights and access to daylight.

Lift and Stair Cores

***NPPM 5:** There shall be no requirement within statutory plans in respect of the number of units per floor per core.*

Lifts are an essential means of providing vertical access between floors for all building users, including people with mobility difficulties and wheelchair users. In higher-density schemes, particularly those comprising mid- to high-rise buildings in central and well-connected locations, careful consideration should be given to passenger lift capacity, vertical circulation, lift frequency and experience by the lift user in terms of lift capacity.

The removal of a maximum limit on the number of apartments served per floor could result in substantial waiting times, causing unnecessary inconvenience for residents. As apartment living is increasingly encouraged, this should not come at the expense of day-to-day convenience and accessibility. A minimum of two lifts per stair core provided should be encouraged.

Consideration should also be given to alternative lift use means when lift maintenance, servicing, and potential breakdowns occur.

Buildings should be designed to ensure that residents, particularly people with mobility impairments and wheelchair users, are not disproportionately affected when lifts are out of service. Appropriate lift provision and resilience are therefore essential to support accessible and inclusive residential developments. This reflects Respond's core value of inclusive design for an integrated community in all our housing and apartment buildings, as discussed in Chapter 5 of the Respond Design Guide.

Recommendation

A minimum of two lifts per stair core provided should be encouraged in mid to high rise buildings.

Communal, Community and Cultural Facilities

***NPPM 6:** The provision of new Communal, Community and Cultural facilities within apartment schemes shall only be required in specific locations identified within the development plan and shall not be required on a blanket threshold-based approach in individual apartment schemes.*

Respond are committed to building sustainable communities that enhance the well-being of tenants. We recognise that along with delivering much needed homes, communities also require access to a

variety of additional facilities to foster their success. These amenities create opportunities for social interaction including chance meetings that strengthen community cohesion and support overall quality of life. Notwithstanding the challenges Respond experiences in funding communal facilities, our experience is that these facilities are essential to maintaining sustainable communities, supporting social integration and fostering successful neighbourhoods. Their importance is particularly prominent as we move towards higher-density and large-scale mixed tenure developments and therefore, we caution a move away from the mandatory provision of these facilities, as set out under the NPPM 6.

Recommendation

Communal, community and cultural facilities are facilitated within all large scale/high density development schemes. The provision of these facilities, where possible at ground floor level will assist in creating the opportunities for social interaction, strengthen community cohesion, and support overall quality of life. Facilities at ground floor level will also assist with articulation of the elevation and contribute positively to the environment, community and the streetscape where the development is proposed. Please see **Appendix 3** which provides analysis from the *Respond Design Guide*, pertaining to all community, recreational and social needs.

Balconies

Draft Standards: *“Planning authorities may accept a reduced provision of balconies where high-quality, usable communal open space is provided within the scheme or where their amenity value is negligible, such as:*

- (a) where units front onto major sources of noise and air pollution such as busy roads or;*
- (b) on taller buildings/facades that are exposed to high wind conditions.*

The number of units without direct access to private amenity space within apartment schemes should not exceed 50%.” (p22)

Respond does not support any provisions permitting a reduced provision of balconies, and in particular by the acceptance of schemes in which up to 50% of units would have no direct access to private amenity space.

Respond's policy provides for careful consideration being given to balcony provision in every scheme, Private open space is a major contributor to the health and wellbeing of our tenants, and the quality of its provision is central to Respond's approach to designing homes.

Respond details a design strategy within the *Respond Design Guide* which promotes recessed balconies as an ideal provision of external private open space for apartment living, for apartment units which serve persons with disabilities, older people and/anyone with less mobility. We note that adopting a strategic design led approach to balconies, with both recessed balconies and winter garden provision, offsets any challenges to balcony provision that needs to be accommodated on both busy roads and on taller buildings which are exposed to high wind conditions. The elevational treatment of apartment blocks is enhanced by this strategic approach as evidenced in several of Respond's recent developments. The omission of private open space not only detracts from the quality of life and wellbeing of our tenants but also detracts from the elevational treatment of apartment blocks through uniformity and a monotony of approach.

Recommendations

- Quality private amenity space should be included for all apartments, in particular studio units. In the interests of occupant wellbeing and quality of life, no apartment units should be without direct access to private open external space.
- A strategic approach to balcony provision should be considered at early design stage. In particular, we encourage the use of recessed balconies and winter gardens to improve the quality of private open space for all, with a user focus on older and tenant with a disability and/or limited mobility. Adopt a strategic design led approach to balconies, with both recessed balconies and winter garden provision offsets any challenges too balcony provision that need to be accommodated on both busy roads and on taller buildings which are exposed to high wind conditions
- Please see **Appendix 4** which provides analysis from the *Respond Design Guide*, pertaining to building form, fenestration, balcony and private open space standards strategies.

Conclusion

Respond is committed to being a proactive and solutions focussed partner in addressing Ireland's housing and homelessness crisis. With our proven track record, deep expertise, and extensive experience in housing delivery and supporting sustainable communities, we welcome the opportunity to contribute to this consultation process on the *Draft National Planning Statement on Planning Design Standards for Apartments 2026*. We would be happy to engage further to discuss our recommendations.

A note on Respond's Design Guide (attached to this submission):

The Respond Design Guide has been written to communicate key design principles to all parties who are contributing to designing and delivering Respond schemes, both housing and community services. The guide has been designed as a tool to establish a benchmark for the design quality of all Respond projects.

In addition to this the guide focuses on climate change: climate management strategy on adaptation and de-carbonisation: and a strategic approach to biodiversity and living in close harmony with nature. Strong principles embedded into placemaking design can facilitate the creation of spaces that support the needs, health, well-being and happiness of tenants and users.

Please see link to the [Respond Design Guide](#)

APPENDIX 1



Inclusivity, diversity and accessibility

What are the user group and cultural requirements?

Are there site specific spatial, social and financial constraints that should be considered?

How can ease of access be provided by foot, on wheels, or by private or public transport?



Flexibility and future-proofing

How can the space be adapted to suit the changing needs and demands of the local community?

Can wider structural spans be considered to allow for reconfiguration of internal walls at a later date?



Fig.47. Artist impression through a varied neighbourhood
Respond in conjunction with Fennela Architects for EOI submission to DCC



Existing social spaces

Is it possible to emphasise the unique character of the existing space, utilising innovative designs to accommodate activities set out in the scheme brief?

Can gardening activities be added to existing social spaces to help promote social integration?



Secondary spaces

How are areas such as circulation being considered? They are key to encouraging social interaction.

APPENDIX 2

3.2. Master planning principles: site layout and scheme design of open space and landscaping, the hierarchy of streets and spaces and access to daylight and sunlight

Best practice design considerations for social infrastructure and integration

When integrating other uses as part of a development, the following master planning principles should be considered:



Location

Is this space for local communities?
Will the wider community also have access?

Will the space benefit from a location with higher footfall?

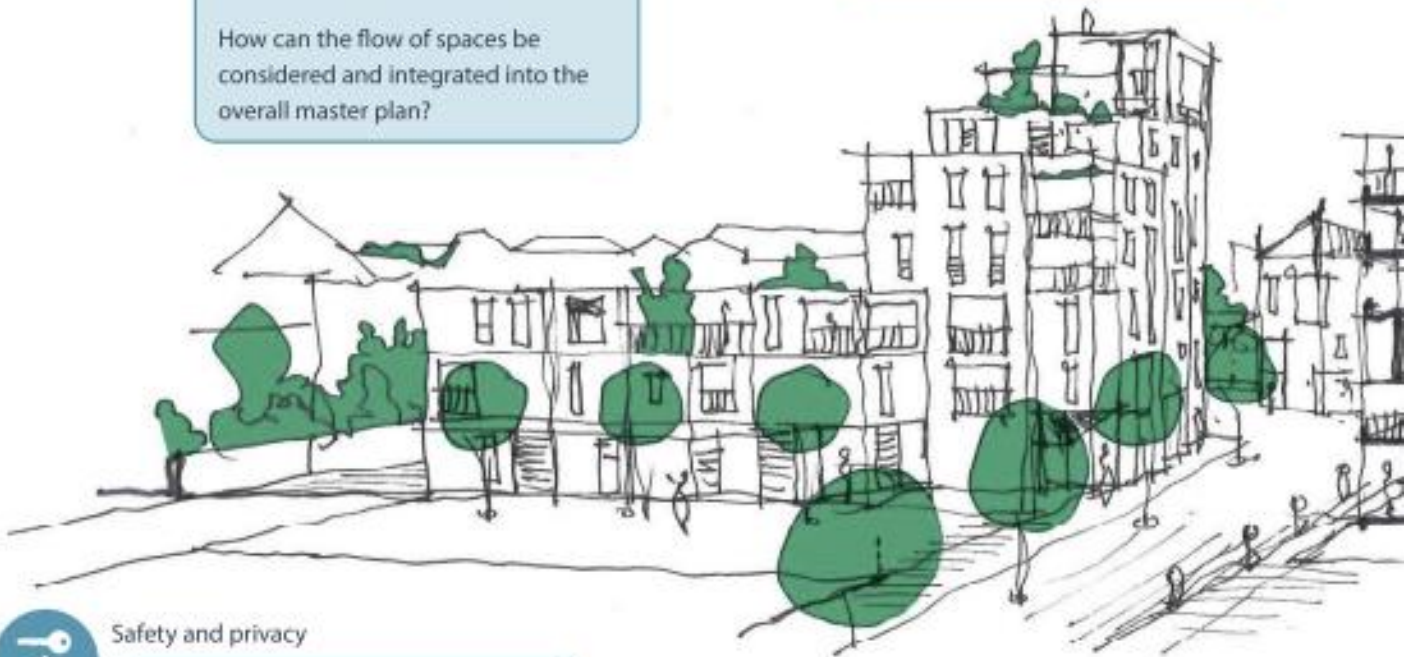
How can the flow of spaces be considered and integrated into the overall master plan?



Local heritage and context

What are the distinctive characteristics of the local heritage and context?

How can new proposals enhance the existing context?



Safety and privacy

What level of security and privacy is appropriate for the given use and user group?

Some user groups may need increased screening and privacy to feel safe and secure inside their home. Spatial planning is critical to allow for private spaces to function successfully alongside public spaces. Building frontages which promote activity and passive surveillance can be used to help reduce anti-social behaviour.



Relationship with other support services

Could the space benefit by being adjacent to other support services?

Will there be a shared communal facility to encourage wider community integration?

How can a space provide opportunities for integration to help encourage the development of relationships?

Are there any areas of public realm which can be designed to encourage social integration?

APPENDIX 3



3.1. Introduction to place making: responsible built form

Strong principles embedded into placemaking design can facilitate the creation of spaces that support the needs, health, well-being and happiness of tenants and users.

Respond seeks to provide shared places for people to interact, relax and play - places that are critical to successful integrated communities. Providing connections to local amenities (including shops, schools and nurseries) is also essential to facilitating an active modern lifestyle. The design of new buildings and places must always be site specific and respond to local context to ensure the development of distinguishable neighbourhoods that those living within then feel more connected with.

Respond ensure their design teams work closely with Places for People – the National Policy on Architecture (2022) and Housing for All – A New Housing Plan for Ireland (HfA) 2021.

Respond take pride in ensuring they:

- Understand how people use their neighbourhoods.
- Strengthen existing communities.
- Promote public health and a clean and safe environment.
- Empower tenants by providing inclusive design.
- Understand the constraints and opportunities of the site.
- Promote sustainability by applying 'lean, green and clean' design principles.



Fig.46. Strengthening communities with gardening
Respond Community Gardens



Inclusivity, diversity and accessibility

What are the user group and cultural requirements?

Are there site specific spatial, social and financial constraints that should be considered?

How can ease of access be provided by foot, on wheels, or by private or public transport?



Flexibility and future-proofing

How can the space be adapted to suit the changing needs and demands of the local community?

Can wider structural spans be considered to allow for reconfiguration of internal walls at a later date?



Fig.47. Artist impression through a varied neighbourhood
Respond in conjunction with Perreia Architects for EOI submission to DCC



Existing social spaces

Is it possible to emphasise the unique character of the existing space, utilising innovative designs to accommodate activities set out in the scheme brief?

Can gardening activities be added to existing social spaces to help promote social integration?



Secondary spaces

How are areas such as circulation being considered? They are key to encouraging social interaction.

Supporting mixed use developments - principles of 15 minute city



Mixed-used neighbourhoods are only sustainable when in proximity to other densely built up areas.

For example, shops within a stand alone apartment building will not survive if they do not have enough passing trade from other members of the wider community.

Larger schemes will require extra facilities and these should be taken into account when designing the scheme layout. Shopping, community hubs, recreation/playing fields, Garda Stations, libraries, etc.

Higher densities can offer significant benefits and can help ensure the success of surrounding facilities when integrated into attractive, liveable, well-designed, high quality urban places.

Best practice design principles to be considered include:

- Number of local tenants who would provide custom.
- Types of uses, and any noise, smells, traffic generated.
- Management of different uses - ideally these should be separate, but early engagement with end users is critical to understanding management impacts.

The Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities and National Planning Framework must be considered throughout the design process to help assess appropriate density levels and the right mix of uses for specific sites.



Fig.54. Mixed-use neighbourhoods in proximity to transport options
Elanora Court, Rospond, McCrosson O'Rourke Manning Architects



APPENDIX 4

3.3. Defining character areas: mix of land uses, vibrant centres and communities

Building typologies and use

Form



Following reviews of the scale and massing of a master plan, more detailed articulation of building forms must be considered in relation to the height, scale and boundaries of the surrounding context and character areas.

Building elements which will inform the detailed articulation of any building include:

Building proportion and composition strategies



- Set out the rhythm of bays forming a street or building.
- Create a comfortable environment which is of a human scale.
- Agree key points where the introduction of breaks in the massing/architecture is appropriate.
- Consider both vertical and horizontal proportions.

Roof Articulation (Set-backs and parapets)



- Use prominent roof shapes (including pitched roofs) to emphasise key corners/landmarks in a scheme.
- Use parapets to help balance proportions on elevations and provide roof guarding.
- Introduce set-back top floors to improve privacy and reduce the visual impact of buildings from street level.

Special moments



- Define key moments on the building form such as:
 - Recessed entrances.
 - Under-crofts.
 - Linking stairs.

Fenestration strategies



- Proportion of windows should be reviewed in relation to building proportions.
- Consider larger windows to lower levels.

Balcony strategies



- Balconies should consider orientation, building height, views, privacy requirements, wind factors, daylight, noise, comfort and usability.
- Consideration should be given to balconies which are fully recessed into the building, particularly where additional privacy and/or shade is desirable such as on southern elevations and where balconies face busy streets.
- Consider areas where a larger balcony may help balance the visual approach of the building, such as visually lighting corners, with the added benefit of more amenity space for tenants.

Respond have a preference for semi-recessed or inboard balconies which allow for better protection from the elements, particularly in tall buildings.

Deck access strategies

- Where provided, deck access should be carefully detailed. Where practical deck access spaces should promote social integration by providing informal spaces to meet neighbours whilst maintaining appropriate privacy near windows and doors.



Tenants Gardens



Fig.77. Familiar plants
Residential gardens, Respond



Fig.78. Plants chosen by tenants
Community garden, Respond

Respond advocate giving tenants choices. Simple design choices should be based on individual tenant responses such as whether or not they want a tree in their garden. An allowance for the tree of their choice within the cost plan should be considered.

Best practice design principles to be considered include:



The pros and cons of planting trees which can be climbed – discuss preferences with tenants in advance.



Introduce fruit and nut trees as these help promote community interaction.



Locations for re-wilding should be considered. They can be beneficial when rationalised within the overall master plan. (All-Ireland Pollinator Plan provides additional information on how to help pollinators survive and thrive. <https://pollinators.ie/>).



Non-native invasive plants are becoming an increasing issue. They can impact on local biodiversity due to their aggressive growth. Most commonly, Japanese knotweed is a key concern. Some simple measure can help prevent the spread of invasive species, including;

- Early risk assessments.
- Raising awareness of invasive species.
- Develop strategies to prevent spread.

The inclusion of native species is encouraged as they can evoke memories through sight, smell and even the sound of plants outdoors. Plants should be suitable for the local climate and orientation for each site.



Space standards

- Minimum Private Open Space standards should be reviewed in line with the Sustainable and Residential Development and Compact Settlement Guidelines.
- Respond encourage design teams to apply a balanced and flexible approach by considering provision both private and semi-private spaces, ensuring the best possible external amenity within the site specific context.