

05/08/2025

**Re: Freedom of Information request 202507 – Request Part-Granted.**

Dear,

I refer to your request originally dated and received on the 7<sup>th</sup> of July 2025, which you have made under the Freedom of Information Act 2014 for records held by this FOI body. Your request sought:

*A copy of the costings exercise undertaken by the LDA referenced in the briefing from the Minister for Housing, Local Government and Heritage dated 6.7.25*

I wish to inform you that I have decided to part-grant your request on the 05<sup>th</sup> of August 2025.

The purpose of this letter is to explain that decision.

**1. Findings, particulars and reasons for decisions to deny access.**

On receipt your request was forwarded to the relevant sections within the LDA to identify records held which were within the scope of your request as set out above.

These records are attached to this decision letter for your information.

Several redactions have been applied to Record 1 under Sections 30(1)(c) of the Act. These redactions are detailed in the Schedule of Records in **Appendix 1**.

Section 30(1)(c) states that:

**Functions and negotiations of FOI bodies**

*30.(1) A head may refuse to grant an FOI request if access to the record concerned could, in the opinion of the head, reasonably be expected to—*

*(c) disclose positions taken, or to be taken, or plans, procedures, criteria or instructions used or followed, or to be used or followed, for the purpose of any negotiations carried on or being, or to be carried on by or on behalf of the Government or an FOI body.*

I am cognisant of the fact that the release of information under the Act is, in essence, a release to the public at large. I am satisfied that the release of certain sensitive information contained within these records would prejudice the ability of the LDA to compete against private sector developers if the LDA's development cost model was known.

I am refusing the release of parts of the record under the provisions of section 36(1)(b) as they contain commercially sensitive information.

### **Public Interest Test**

There is a Public Interest Test associated with section 30 of the FOI Act whereby my decision must be made having fully considered the public interest relevant to this request. I have considered the public interest issues which arise in your request, and have taken account of the following factors in favour of release:

- Ensuring openness and transparency of organisational functions to the greatest possible extent.
- The public interest in members of the public exercising their rights under the FOI Act.
- That there is more than just a transitory interest by the public in this information being released.
- There has been significant and ongoing public discussion surrounding the revised housing standards.

While there are no harms provisions in relation to Section 30(1)(c) of the Act In considering the public interest factors which favour withholding the records as detailed in your request, I have taken into the account the following:

- Allowing a public body to hold a position regarding specific subject matters that will inform future negotiations with other public bodies.
- That other public bodies having knowledge of certain views of the LDA will prejudice future negotiations.
- That the LDA is not prevented or impeded from the effective pursuit of its legitimate business.

Having balanced the public interest factors both for and against the release, I decided that the public interest in preserving the information and the reasonable expectation that information can be maintained in a confidential manner by the LDA outweighs the public interest which would be served were the detail released to you.

## **2. Right of Appeal**

In the event that you are unhappy with this decision you may appeal against it. If you need to make such an appeal, you can do so by writing to the Freedom of Information Unit, Land Development Agency, 4<sup>th</sup> Floor, Ashford House, Tara Street, Dublin 2 or by e-mail to [foi@lda.ie](mailto:foi@lda.ie).

Please note that the fee applies. This fee has been set at €30 (€10 for a Medical Card holder). Payment should be made by way of bank draft, money order, postal order or personal cheque, and made payable to Head of Finance, Land Development Agency, 2<sup>nd</sup> Floor, Ashford House, Tara Street, Dublin 2.



An Ghníomhaireacht Forbartha Talún  
The Land Development Agency

Payment can be made by electronic means, using the following details:

**The Land Development Agency DAC**

**IE61AIBK93101264101092**

**BIC: AIBKIE2D**

You must ensure that your FOI reference number (**FOI 202507**) is included in the payment details.

You should make your appeal within 4 weeks of the date of this notification, where a day is defined as a working day excluding the weekend and public holidays. However, the making of a late appeal may be permitted in appropriate circumstances. The appeal will involve complete reconsideration of the matter by a more senior member of the staff of this body.

Please be advised that the Land Development Agency replies under Freedom of Information may be released into the public domain via our website at [lda.ie](http://lda.ie). Personal details in respect of your request have, where applicable, been removed to protect confidentiality.

Should you have any questions or concerns regarding the above, please contact me by telephone on (01) 9103400.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'M. Szyszko', is written over a horizontal line.

Monika Szyszko,  
Senior Compliance Manager

## Appendix 1: Schedule of Records

| Requester name: |                                     |   |                             | Request Re:202507                        |                           |
|-----------------|-------------------------------------|---|-----------------------------|--|---------------------------|
| Page number     | Description of document             | Deletions   | Relevant section of FOI Act | Reasons for deletion                     | Decision Maker's decision |
| 1-11            | Record 1 Costing Exercise 24.4.2025 | Positions and criteria that can be expected to inform future negotiations | 30                          | Functions and negotiations of FOI bodies | Part-Grant                |
| 12 - 16         | Record 2 -                          | NA  | NA                          | NA                                       | Grant                     |
|                 |                                     |   |                             |  |                           |
|                 |                                     | Total number of pages   |                             |  | 16                        |
|                 |                                     | Total number of pages for full release                                    |                             |  | 12                        |
|                 |                                     | Total number of pages for partial release                                 |                             |  | 4                         |
|                 |                                     | Total number of pages being withheld                                      |                             |  | 0                         |

A stylized graphic of a city skyline with several buildings of varying heights, rendered in dark green and black silhouettes against a dark green background.

# **LDA** Apt Guidelines + Standards

24<sup>th</sup> April 2025

# Design Considerations:

1. Apartment Mix
2. Apartment Areas
3. Dual Aspect
4. Balconies
5. Parking
6. Individual Initiatives being implemented



# 1. Apartment Mix

- The Design Standards for New Apartments set out **Specific Planning Policy Requirement 1**;
  - *Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. **Statutory development plans may specify a mix for apartment** and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).*



- Typical market delivery cost of apartments;

| Apartment Types | Delivery Cost |
|-----------------|---------------|
| Studio          | €385,000      |
| 1B2P            | €415,000      |
| 2B3P            | €485,000      |
| 2B4P            | €525,000      |
| 3B4P            | €565,000      |
| 3B5P            | €595,000      |

*The Total Development Cost Study 2024, commissioned by the Department identified a cost range of €535,000 to €579,000 for 2 bed 4-person apartment.*

- Obvious affordability constraints;
  - **In particular, 3-bed apartments are not viable.**
  - LDA cost rental experience when letting apartment scheme is that **3-bed apartments are very difficult apts to let and not in demand.**
- **The omission of 3B5P apts from a scheme has significant benefits – 1 no. 3B5P can be replaced with 2 no. 1B2P**

## 2. Apartment Floor Areas

- The Design Standards for New Apartments set out baseline minimum apartment floor areas.
  - However, these **baseline minimum areas are not achievable** when the requirements set out in *Appendix 1 Required Minimum Floor Areas and Standards* are also factored into the design.
  - In addition, it is a requirement that the majority of apartments exceed the minimum floor area standard by a minimum of 10% (*any studio apartments must be included in the total, but are not calculable as units that exceed the minimum by at least 10%*)
- The **impact** of this on a typical LDA Apartment scheme is that the floor area of the scheme will exceed the minimum apartment floor areas by 7% (i.e. the **average per apartment size is 7% above the minimum apartment floor areas**).
- **Proposal** to facilitate designing apartments to the baseline minimum apartment floor areas;
  - **Omit requirement for majority of apartments to exceed the minimum floor area by a min of 10%.**
  - **Modify requirements in Appendix 1:** (i) twin bedroom to be omitted /same size a double bedroom; (ii) omit aggregate floor area for living / dining / kitchen; (iii) introduce flexibility on storage – provision that up to half of requirement could accommodated in a secure area outside of the apartment.
- **Resultant benefit €8k-€10k saving per apartment.**
  - Based on the 100-unit scheme (LDA mix) , and an area reduction of 375m<sup>2</sup>, the cost reduction applicable in achieving minimum areas is between €8,000 to €10,000 per home.

Minimum bedroom floor areas/widths\*\*\*

| Type           | Minimum width | Minimum floor area           |
|----------------|---------------|------------------------------|
| Studio         | 4m**          | 30 sq m**                    |
| Single bedroom | 2.1 m         | 7.1 sq m                     |
| Double bedroom | 2.8 m         | 11.4 sq m                    |
| Twin bedroom   | 2.8 m         | <del>13 sq m</del> 11.4 sq m |

Minimum aggregate floor areas for living/dining/kitchen rooms, and minimum widths for the main living/dining rooms

| Apartment type ***      | Width of living/dining room | Aggregate floor area of living / dining / kitchen area* |
|-------------------------|-----------------------------|---|
| Studio                  | 4m**                        | 30 sq m**   |
| One bedroom             | 3.3 m                       | 23 sq m   |
| Two bedrooms (3 person) | 3.6m                        | 28 sq m   |
| Two bedrooms (4 person) | 3.6 m                       | 30 sq m   |
| Three bedrooms          | 3.8 m                       | 34 sq m   |



## Benefits: 1. Apartment Mix and 2. baseline Minimum Apartment Floor Areas

- Baseline study based on LDA Apartment Typologies unit type areas and a typical LDA mix (included 5% 3B5P) in a 100 no. unit apartment block;

| Scenario   | Statistics:  |                               |                                 | Alternatively, maintain same building footprint and add Apts [2B3P] |
|--|--|-------------------------------|---------------------------------|---|
|  | Resultant Area Saving Sqm delta                    | Resultant Area Saving % delta | Resultant Cost Saving € delta   |   |
| Typical LDA mix in a 100 no. unit apartment block – reduce all apartment sizes to the Minimum Apartment Floor Areas                              | <b>c. 375 sqm</b> over minimum areas in Guidelines | 7%                            | <b>€8,000-€10,000</b> per home  | c. 6  |
| Typical LDA mix in a 100 no. unit apartment block – reduce all apartment sizes to the Minimum Apartment Floor Areas and omit all 3B5P apartments | Reduction of c. <b>500 sqm</b> over LDA baseline   | 8%                            | <b>€10,000-€14,000</b> per home | c. 8  |

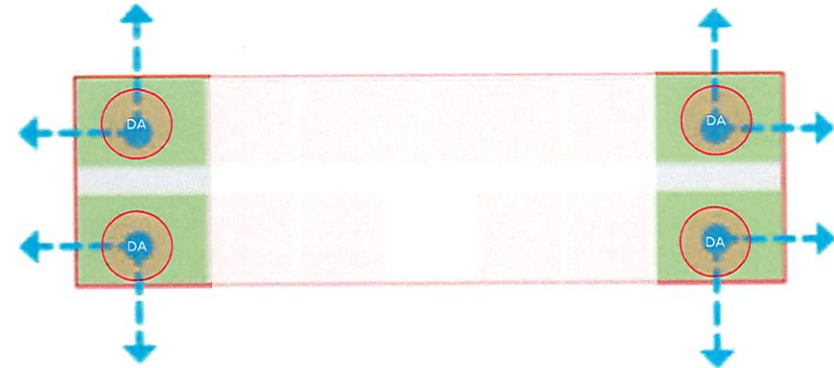
### 3. Dual Aspect

Design Standards for New Apartments, DoHLGH, 2023, item 3.17 and **SPRR 4** set out:

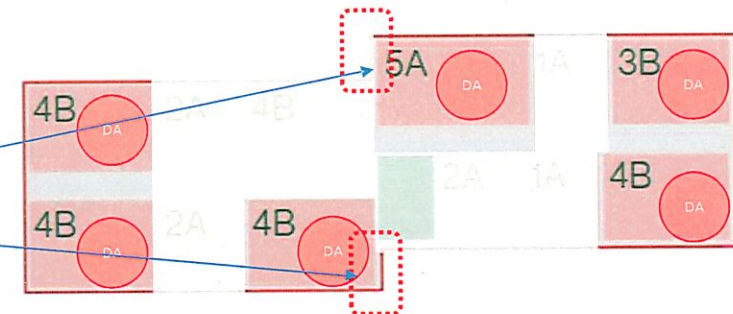
*'at least 33% Dual Aspect in central, accessible and some intermediate locations. Green field / brown field regen sites frontage less onerous a minimum of 50% dual aspect apartments with any 3B5P be dual aspect Single aspect north facing apartments may be considered if overlooking a single amenity i.e. public park, formal space water body or amenity feature'*



Offset in block configuration to maximise dual aspect [50%] lends to an increase in façade area – increase in cost of **€6,000 on affected apartments**, with loss to efficiency and constructability



LDA standard block 33% Dual Aspect

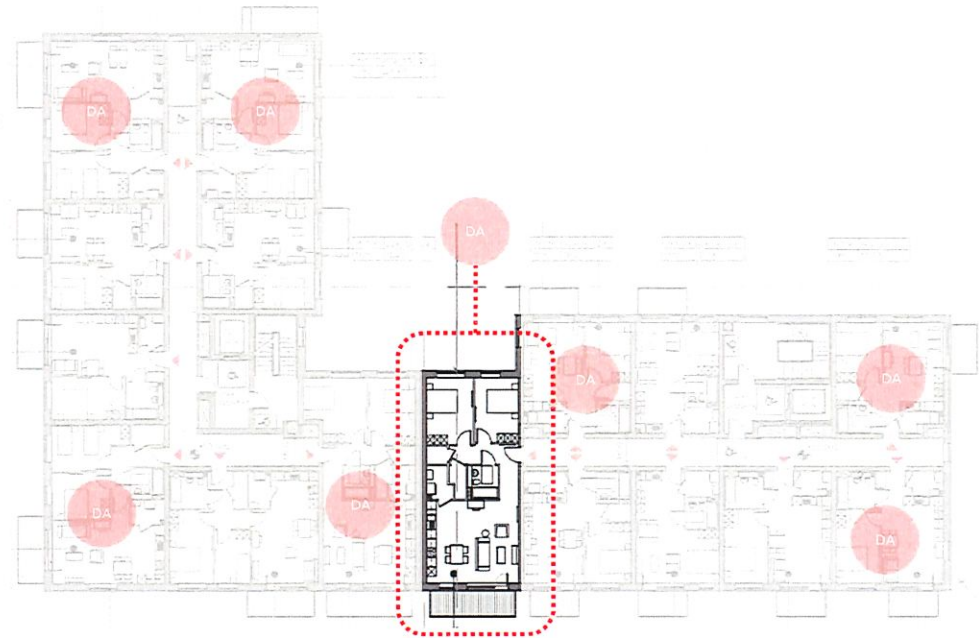


LDA standard block 50% Dual Aspect

### 3. Dual Aspect

Typical 2B4P 'thru dual aspect' apartment, which is a non LDA standard typology is currently used on LDA projects, with an area of 80.5sqm, is **7.5 sqm larger** than the minimum 2B4P apartment size of 73sqm, adding an additional **cost of circa €15,000-€20,000**

Typical block layout opposite consists of 16 no. apartments with 8 no. dual aspect apartments, delivering **50% dual aspect** on this typical level.



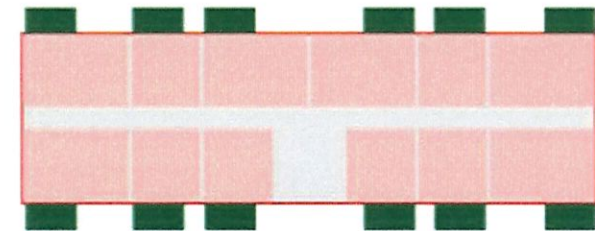
\*Extract typical Thru dual aspect apartment from LDA project.

23<sup>rd</sup> April 2025



## 4. Balconies

- Benefits of flexibility for removal of balconies in favour of external landscape opened spaces, significant cost savings can be achieved.
- Cost of most efficient balcony type - clip on balconies, cost range for 5sqm - **€11,000**, 7sqm - **€13,000**.
- Cost of recessed/ inset balconies, as aggregate cost recessed balcony is **€20,000-€22,000**, negative impact of inset/ recessed balconies:
  - Greater internal floor area,
  - Increase external fabric area and costs,
  - Increase % of non standard apartments,
  - Decreased internal daylight/ sunlight factors
  - Loss of standardisation and efficiency.
- Potential for standardisation of balconies - **reduce to two standard types** 4sqm [studio/ 1B2P] and 6sqm [2B3P/ 2B4P]



Minimum floor areas for private amenity space

|                         |        |
|-------------------------|--------|
| Studio                  | 4 sq m |
| One bedroom             | 5 sq m |
| Two bedrooms (3 person) | 6 sq m |
| Two bedrooms (4 person) | 7 sq m |
| Three bedrooms          | 9 sq m |

\*Extract of Appendix 1, Design Standard for New apartments, DoHLGH, 2023


## 5. Parking

*[LDA to add info Car Parking Tipping Point]*

- Carparking Ratios
  - How this is implemented on a project level and influenced by LA
  - Moving towards to lower car ratios - avoiding expensive and carbon heavy storage solutions i.e. podiums/ basements



## 6. Individual Initiatives being implemented & resultant viability impact

- 5% Community & Cultural spaces – resultant €12,000 - €20,000 capital costs uplift per apartment
- 
- **Bike Parking**
  - appropriate balance of bike parking - 1 bike space per bed space lends to very large bike storage requirements which are costly if within the fabric of a building, in existing schemes are this quantum of bike parking being utilised?
- **Blue Roof**
- **EV charging**

# Universal Design

LDA Apartment Typology Booklet sets out that Universal Design Home apartments layouts are designed to be **interchangeable with the +10% over LDA apartment** types.

The approach to universal design homes should minimize variations.

The percentage of UD and UD+ homes is typically set out in LA Development Plans, IGBC HPIv3, Level 1 requirement [not mandatory] is that 10% of homes, in developments over 100 homes are UD homes

|   | 1B2P    | 2B3P    | 2B4P    | 3B5P    |
|---|---------|---------|---------|---------|
| Universal Design 'UD'                               | €5,408  | €5,674  | €5,745  | €6,055  |
| Universal Design Plus 'UD+'<br>[including UD total] | €11,473 | €12,572 | €12,643 | €15,872 |

## **Updated Design Standards for Apartments, Cost Considerations**

**July 2025**

The Land Development Agency (LDA) Provided advice to the Department of Housing, Local Government and Heritage (DHLGH) in respect of the potential cost savings of individual measures to be included in the updated Design Standards for Apartments, Guidelines for Planning Authorities.

It is emphasised that these costs do not apply cumulatively to all units in all developments. Some apply to individual units and others may apply to the scheme as a whole, but each will depend on unit mix and other considerations. They are generalised total gross development costs, which include all hard and soft costs and VAT.

### **Apartment Mix**

The new Guidelines enable greater flexibility in overall unit mix.

It was advised that the current difference in market delivery cost between a studio and a 1-bedroom unit is generally +€30,000; between a 3-person and 4-person 2-bedroom unit is generally +€40,000; and between a 4-person and 5-person 3-bedroom unit is generally +€30,000.

The new floor area provisions for studio apartments will further increase the difference by at €11,000-€13,500 for that unit type, increasing the cost difference for a studio to more than €41,000.

Enabling the provision of a greater proportion of studio; 3-person 2-bedroom and 4-person and 3-bedroom units in a scheme, will reduce the cost of each unit of each type provided by **€30,000-€41,000**.

### **Apartment Floor Area**

The new Guidelines reduce the requirement for a majority of apartments in a scheme that must exceed the minimum apartment floor areas by a min. of 10%, to at least 25%.

It was advised that based on a 100-unit scheme (LDA mix) and an area reduction of 375m<sup>2</sup>, the cost reduction applicable in achieving minimum areas is between €8,000-€10,000 per home. There is also potential to add c.6 extra apartments for the same floor area. Based on the same consideration and also omitting all 3B5P apartments in a typical LDA mix in a 100-unit apartment block and with an area reduction of 500m<sup>2</sup>, the cost reduction applicable would be €10,000 to €14,000 per home. There is also potential to add c.8 extra apartments for the same floor area.

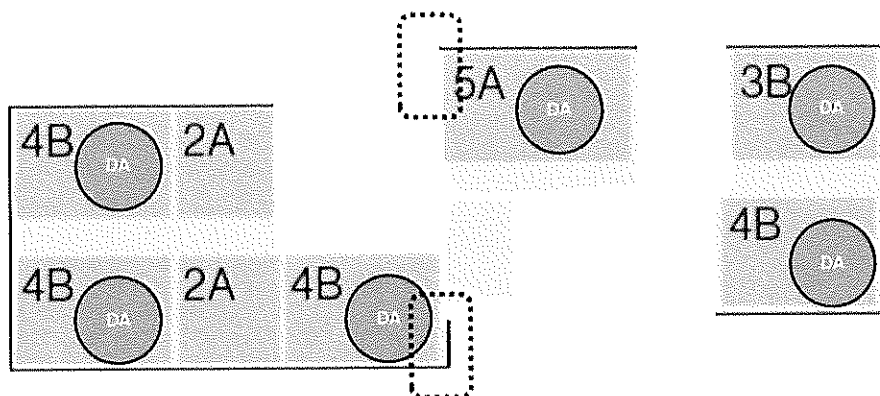
This input is based on a full omission scenario, whereas the final Guidelines reduce the standard by half that, from just over 50% to 25%, so the saving would be **€4,000-€7,000** across a typical development of 100 units.

### Dual Aspect

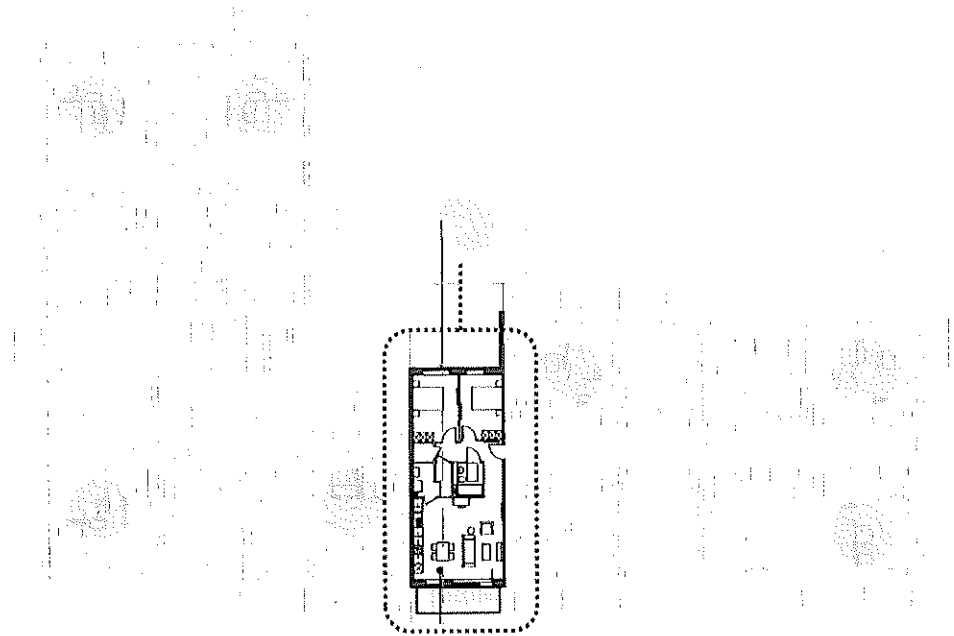
The new Guidelines reduce the minimum requirement for apartments to be dual aspect, from 33-50% to at least 25% of units in a development.

A higher proportion of dual aspect units, places increased pressure on building efficiencies, floor area, building fabric and cost:

Scenario 1 illustrates an 'offset' in block configuration to maximise dual aspect. This leads to an increase in façade area and an increase in cost of €6,000 on affected apartments (i.e. for the affected unit – not a saving per unit), with loss to efficiency and constructability.



Scenario 2 illustrates a typical 2B4P 'thru-dual aspect' apartment, with an area of 80.5sqm, which is 7.5 sqm larger than the minimum 2B4P apartment size of 73sqm, adding an additional cost of circa €15,000-€20,000 (i.e. for the affected unit – not a saving per unit).



While a wide range, the potential the saving would be in the region of **€6,000 to €15,000-€20,000**, for each affected unit.

### **Stair Cores**

The new Guidelines omit the requirement for a maximum of 12 apartments per floor per lift/stair core.

A stair core including lift shaft costs approx. €8,000-10,000/unit based on 12 units per floor per core. Building regulations, site specifics and operational effectiveness of layouts are the main drivers of core locations, which will also relate to unit size and mix.

Capacity to omit 1 in 3 stair cores would reduce the cost per unit by one-third and to omit 1 in 4 stair cores, would reduce the cost per unit by one-quarter. This could amount to **€2,000-€3,000** per unit across a whole scheme.



## **Balconies**

The new Guidelines enable up to 50% of balconies to be omitted, in particular circumstances.

The cost of most efficient balcony type – a ‘clip-on’ balcony, ranges for 5sqm - €11,000 to 7sqm - €13,000. (This may only be realised if balconies are not deployed on a unit)

The cost of recessed/inset balconies is higher, as the aggregate cost of a recessed balcony is €20,000-€22,000. (Again, this may only realised if balconies are not required on a unit).

The saving could range from **€11,000-€22,000** per unit, where applicable.

## **Delivery of Community and other Provision**

The new Guidelines preclude the imposition of mandatory community and/or cultural floorspace, on an individual development basis.

Delivery of community infrastructure can cost in the range of **c.€10,000-15,000** per unit but is heavily dependent on specifics of the scheme and the needs of the location.

## **Car Parking**

The new Guidelines reiterate that reduced or no car parking may be provided in apartment schemes, as provided for in other related planning guidance.

While this is not a new provision, it is important to highlight the cost implication.

Car parking cost ranges **€50,000-€65,000** per parking space for the delivery of an undercroft parking space is based on recent awarded construction contracts (total development cost – all-in costs). This is a cost per space, so any saving through reduction of spaces would have to be distributed across all units.

## Summary

|   | Measure   | Min. Saving | Max. Saving | Applies           |
|---|---|-------------|-------------|-------------------|
| 1 | Allowance for smaller units and more flexible mix (per applicable unit) e.g. 1 bed to studio              | €30,000     | €43,500     | Per unit affected |
| 2 | Reduction of 10% additional floorspace requirement to 25% in conjunction with omitting larger 3 bed units | €4,000      | €7,000      | Across Scheme     |
| 3 | 25% Reduction in requirement for dual aspect apartments   | €6,000      | €20,000     | Per unit affected |
| 4 | Potential reduction in lift and stair cores   | €2,000      | €3,000      | Across Scheme     |
| 5 | Potential reduction in balconies (up to 50%)  | €11,000     | €22,000     | Per unit affected |
| 6 | Requirements for Community and Cultural Spaces  | €10,000     | €15,000     | Across Scheme     |
| 7 | Undercroft car parking  | €50,000     | €65,000     | Per space         |