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Author: CIOB

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Consultation:

Pre-DRAFT RSES Public Consultation - Strategic Issues Paper

Which of the following best describes who you are?

Academic or research sector

Observations:

Theme: Quality of Life and Healthy Places

The Chartered Institute of Building (CIOB) welcomes the opportunity to provide this submission, which is based on our research report, *Building Adaptably: How the construction sector can future proof Irish cities* (attached to this submission). This report has gained significant national attention, having been presented to the Cabinet and featured extensively in national media as a solution to the current urban development paradox.

Currently, the EMRA region - along with the construction sector throughout the country - faces a 'present bias' in urban design, where the form of buildings is rigidly defined by immediate economic demand cycles rather than long-term societal needs. This is most evident in the record 15.7 percent office vacancy rate in Dublin—the highest of any major European city—which exists alongside acute housing shortages and record levels of homelessness. To support the RSES goal of Healthy Placemaking, the Assembly must address this misalignment. We recommend that the RSES mandates Conversion Scenario Planning for all large-scale developments in urban cores. This would require developers to demonstrate at the design stage how a building could transition between functions, such as from commercial to residential, without requiring total demolition.

Drawing on international best practice, such as London's Policy D3, the RSES should require new buildings to incorporate features that facilitate long-term flexibility, including generous floor-to-ceiling heights and robust servicing infrastructure. Such a policy ensures that urban centers remain vibrant and responsive to demographic shifts, such as shrinking household sizes and the rise of remote working. By embedding adaptability as a functional necessity, the Assembly can prevent the emergence of wasted assets and ensure that the region's physical infrastructure supports a high quality of life for all residents.

Theme: Environment and Climate

The CIOB strongly advocates for the RSES to prioritize building adaptability as a cornerstone of the region's transition to a Circular Economy. The built environment is currently responsible for 37 percent of Ireland's carbon emissions, with 14 percent specifically resulting from embodied carbon—the emissions generated by

the mining, quarrying, and transporting of materials and the carbon-intensive process of demolition. Our research indicates that converting an existing building instead of demolishing and rebuilding can save up to 73 percent of embodied carbon.

With Construction and Demolition Waste (CDW) in Ireland forecast to nearly double by 2029, the traditional 'demolish and rebuild' model is no longer environmentally tenable and directly undermines the Climate Action and Low Carbon Development (Amendment) Act 2022. We propose that the Assembly adopts EU Level(s) Indicator 2.3 (Design for adaptability and renovation) as a semi-quantitative assessment tool for all large-scale projects in the region. This would provide a proxy for a building's capacity to fulfill its function over an extended service life.

Furthermore, the RSES should incentivize modular and circular construction through fast-tracked permitting or density bonuses for developers who utilize demountable components, as seen in Paris and Amsterdam. By embedding these standards into public land sales and Green Public Procurement, the Assembly can lead the way in treating the built environment as a dynamic system of stored carbon rather than a disposable asset, ensuring the region meets its net-zero 2050 targets.

Theme: Economic Development and Employment

To ensure long-term Regional Economic Resilience, the RSES must proactively manage the risks associated with structural vacancy in the commercial sector. The EMRA region, and Dublin in particular, has seen a collapse in demand for office space due to the contraction of the global tech sector—which accounted for 51 percent of new office leases between 2017 and 2021—and the stabilization of remote working practices. This underuse poses a significant threat to the urban economy, as vacant assets can lead to an 'urban doom loop': a downturn in real estate leads to defaults on short-term bank loans, contaminates the wider financial system, and results in a sharp decline in commercial property tax revenues required for public services.

The CIOB recommends that the RSES implements a spatially sensitive construction policy that prioritizes versatility over speculative, single-use developments. By mandating adaptability scores for buildings in central urban locations, the Assembly can protect regional investments from market obsolescence. Adaptable buildings are more resilient to economic cycles because they can be quickly repurposed to meet real rather than speculative demand.

We suggest that the Assembly looks to Amsterdam's 'long-life, loose-fit' principles, which encourage developments to be easily reconfigured for different occupancy patterns. Aligning the regional strategy with these principles will safeguard the economic vitality of our urban centers, ensuring they can evolve alongside a changing workforce while protecting the public purse from the costs of long-term vacancy and urban blight.

Documents Attached:

EMRA-C2-1-113 - CIOB Building Adaptably.pdf

Boundaries Captured on Map: No