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Sustainable Neighbourhoods BTR Justification Report

Proposed Strategic Housing Development
Lands at Clongriffin, Dublin 13

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1.0 Introduction

Downey Planning, Chartered Town Planners, 1 Westland Square, Pearse Street, Dublin 2, have prepared this Sustainable Neighbourhoods Build to Rent Justification report, in conjunction with LIV Consult, Leeds, United Kingdom and Ireland, on behalf of the applicant, Gerard Gannon Properties. This statement accompanies a planning application to An Bord Pleanála for a proposed strategic housing development on lands at Clongriffin, Dublin 13.

LIV Group was established in 2008 to provide corporate residential management services for the banking sector, specialising in Block Management, Facilities Management and Lettings. In 2014, LIV transitioned into the UK's Build to Rent(BTR) Sector and has since been the first to introduce a dedicated operating model that defines every stage of a development from acquisition to operation. In 2016, LIV Consult was created to provide bespoke and specialist consultancy advice to the BTR market in the UK and internationally and is currently advising on the development of more than 35,000 BTR units in developments from High-rise apartment communities to suburban masterplans. LIV Consult is also currently involved with over 4,000 BTR units in various phases of development in Ireland.

LIV Consult has informed the preparation of this report in conjunction with Downey Planning in order to demonstrate that the proposed residential development at Clongriffin that forms part of the current applications achieves sustainable communities not only in light of national and local planning policy but also in terms of day to day living and interactions once the development is constructed.

The lands subject to this SHD application form part of a wider masterplan development proposal for Clongriffin which provides for a total of 1,950 residential units and c.22,727.5sq.m. of commercial development. The masterplan lands are divided into three separate planning applications, in accordance with the legislative provisions of the SHD process, such that two of which are SHD applications whilst the third application is being lodged to Dublin City Council.

The proposed 1,950 residential units are provided across 15 no. blocks with 1,130 Build to Rent units and 820 Build To Sell/Private Tenure units proposed. The Build to Rent units are proposed within 8 no. blocks (Blocks 4, 6, 13, 14 (b), 17, 25, 26 & 27) with 3,535 sq.m. of ancillary BTR resident's support facilities and BTR resident services and amenities solely within these blocks.

The overall 3 no. applications also provide for 22,727.5 sq.m of commercial development including c.30 no. retail units, 10 floors of offices, community room, men's shed unit, 3 no. creche facilities, 8 screen cinema, 1 no. commercial gym, 7 no. cafes/ restaurants, in addition to the 4,335 sq.m. of residential support amenities/facilities (e.g. residents meeting rooms, resident's gym, resident's cinema room, etc.) proposed across all blocks (i.e. all blocks comprise amenity facilities including blocks designated for Build to Sell Units). The development also includes car parking, bicycle parking, landscaping including playgrounds, public open space parks and all associated works.

The lands subject to the concurrent applications form part of the wider Clongriffin area that has been under construction by Gerard Gannon Properties since the late 1990s. Construction to date has

included the Train Station, Main Roads including a QBC, residential dwellings, commercial development in addition to Father Collins Park and additional amenity development.

The development of Clongriffin has been subject to a parent masterplan (Reg. Ref. 0132/02) which was granted in 2003 for a scheme of some 3,500 residential units with 85,000 sq.m. of shops, services and employment. This has subsequently been amended to c. 100,000 sq.m. of commercial development following amendment permissions.

To date 1,685 dwellings, duplexes and apartments have been built with a further 500 units under construction. In addition to the construction of residential units, Gerard Gannon Properties have constructed over 80% of the roads, drainage and landscaping and have heavily contributed to the financing of the Clongriffin Train Station. The permitted Masterplan informed the formulation of the Clongriffin- Belmayne LAP and there is a strong emphasis throughout Clongriffin on the delivery of quality homes, sustainable neighbourhoods to support successful communities, timely social infrastructure provision and a city-wide green network with links to the city region. An updated Masterplan being submitted as part of this application sets out how to date there has been some c. 1,685 homes constructed (predominantly private homes) in close proximity to public infrastructure including the railway station and quality bus corridors, a mix of community and social infrastructure is in place with Father Collins Park and indeed community facilities in place, in conjunction with a mix of commercial and retail uses which supports the provision of sustainable neighbourhoods.

The current applications seek to complete the overall masterplan vision for the lands and provide for a higher density of development in close proximity to the town centre and the Rail Station. Clongriffin provides for a range of household types with dwellings, duplexes and apartments forming part of the overall masterplan for the lands. To date, a significant quantum of private dwellings and duplexes have been completed. The current applications provide for apartment units, which have previously been approved, and will complete the overall development. The proposed applicants provide for a mix of apartments for both Build to Rent (i.e. rental properties) and Build to Sell (i.e. can be privately owned). The overall development of Clongriffin provides for a mix of tenures, providing residential units that serve a range of age groups within walking distance of the centre of Clongriffin where retail/offices/commercial uses as well as community facilities are within close proximity to their home.

The proposed development provides for 1,130 build to rent units with 850 units now proposed as Build to Sell/Part V units. Therefore, the proposed apartment units are predominantly proposed as Built To Rent Units. Noting the scale of the proposed development and the quantum of Build to Rent tenure within the overall development, Downey Planning have set out a justification for the Build to Rent element of the development, which is set out in Section 4 of this report.

2.0 Clongriffin

The lands at Clongriffin have formed part of a large-scale Masterplan that was granted planning permission in 2003 under Reg. Ref. 0132/02 (ABP Ref. PL29N. 131058). Gerard Gannon Properties (Gannon Homes) and CCK Architects have worked with Dublin City Council from the late 1990s to establish a design-led masterplan for Clongriffin. In 2002, Gannon Homes applied for planning permission for the lands based on the guiding principles which had been established by Urban Initiatives and the North Fringe Area Action Plan and planning was granted for a scheme of some

3,600 dwellings in a mixed-use context with c. 85,000 sq.m shops, services and employment (amended to c. 100,000 sq.m. following amendment permissions to the parent permission) all integrated to form a sustainable Town Centre. This scheme formed the masterplan for Clongriffin and construction commenced in 2003 (Reg. Ref. 0132/02). Therefore, the layout and form of the lands at Clongriffin were subject to a plan led masterplan development within which a significant quantum of existing infrastructure has been completed including:

- 1,685 houses, duplexes and apartments built;
- 13,950 sq.m. of commercial and retail development completed including local shops and services;
- Clongriffin Dart Station constructed and in operation;
- Clongriffin Main Street constructed including the extension of Malahide Road QBC;
- Dublin Bus services operational;
- Internal Road Network constructed up to wearing course;
- Multi-storey car park constructed;
- Park and Ride facility constructed;
- Station Square plaza completed;
- Class 1 Public Open Space (Fr. Collins Park) – constructed and operational;
- Mayne River Linear Park complete up to attenuation pond;
- Landscaping of principal streets and public squares completed including Station Square;
- Internal Drainage network for foul and surface water constructed including attenuation pond.

These services/facilities were provided under the granted masterplan permission with residential units constructed to date at Belltree, Belltree Green, Belltree Park, Marrsfield, Park Terrace and Park Edge, with further units currently under construction at Park Terrace, Marrsfield Avenue and along Main Street. The residential units constructed to date are located to the south of Main Street and to the east of Father Collins Park and are predominantly 2-3 storey privately owned residential dwellings, duplex and apartments with the development gradually increasing in height to 6-8 storey apartment developments in close proximity to Clongriffin Train Station.



Fig. 1 – 2001 Masterplan Layout granted under Reg. Ref. 0132/02

Furthermore 13,950 sq.m. of commercial development has been constructed to date with a further units under construction with the units predominantly along Main Street and within the Town Centre adjoining the Train Station. There are a number of offices, health centres, shops, cafes/restaurants/takeaways and shops that currently operate within the centre of Clongriffin including Centra, Stacks Pharmacy, Clongriffin Medical Centre, Clothes Alterations, Body Transformation Studio, Revv Barbers, Romayos Diner etc. There are also a number of community and social facilities available within Clongriffin including two community centres at Clongriffin Hub and Clongriffin Junction which hold weekly events including Men's Shed, Yoga Classes, Dance Academy etc.

There are significant sports and leisure facilities within Clongriffin with Trinity Sports & Leisure Club which offer facilities including a 25m swimming pool, scuba diving, aqua aerobics classes, sporting hall accommodating indoor football, basketball, keep fit classes, lounge areas including a darts and pool lounge as well as accommodating parties, boxing clubs etc. The applicant has also developed a relationship with Trinity Sports & Leisure such that residents within Clongriffin avail of a free year's membership and ongoing discounted fees.

There are also additional services provided within Father Collins Park which is Ireland's first wholly sustainable park and extends to 26 hectares. The park comprises high quality playground facilities, circuit track, skate park, sports pitches including all weather pitches and provides a high-quality amenity and open space park for residents in Clongriffin. The River Mayne Linear Park also provides

high quality public open space for residents with the overall vision for the corridor to provide a walking route from Clongriffin to Belcamp to the west.

The proposed completion of the remaining blocks in Clongriffin supports the adequate provision of a range of mixed tenure, affordable, adaptable housing and work spaces that are fit for purpose in economically, socially and culturally mixed and sustainable neighbourhoods in close proximity to public transport corridors.

3.0 Dublin City Development Plan 2016-2022

3.1 Sustainable Neighbourhoods

The Dublin City Development Plan 2016-2022 seeks to provide sustainable neighbourhoods and communities as one of its key overarching policies. Section 2.3.10 of the Development Plan states that:

“The creation of good, sustainable neighbourhoods which support thriving communities and provide for a wide range of household types, age groups and tenures with community facilities close by is a priority of this plan. In order to achieve this, criteria and standards for good neighbourhoods are a central part of this strategy. These principles are intended to ensure, for example, that infrastructure such as schools, shops and childcare facilities are provided in a phased and coordinated manner. The creation of good neighbourhoods and socially-inclusive communities applies to both the inner and outer city.

The importance of local neighbourhood shopping centres within walking distance of residential communities is re-affirmed in this key strategy. Guiding principles to promote the regeneration of certain social housing areas into attractive mixed-use neighbourhoods is also included in the plan.”

In terms of sustainable communities, Clongriffin supports the principles of a good sustainable neighbourhood noting that a wide range of household types and tenures with community facilities has already been provided to date. It is noted that c. 1,685 dwellings, duplexes and apartments have been constructed to date, with the proposed 1,950 units representing the completion of the Clongriffin area. On completion of Clongriffin, there will be a significant variety of household types and tenures with private residential dwellings and apartments in conjunction with rental dwellings and apartments all provided within a town centre with retail, café, commercial and office uses such that residents could live and work within Clongriffin.

The existing residential development to date in conjunction with the proposed development of 1,950 apartments provide for a range of unit types and sizes that will cater for a variety of housing needs, including families, individuals and couples, and indeed the elderly and also mobility impaired persons in a mix of unit types including three and four bed residential dwellings, duplex units and indeed a mix of one bed, two bed and three bed apartment units. All of these units are provided within walking distance of the centre of Clongriffin where a wide range of retail, commercial and community facilities are proposed and indeed have already been provided to date by Gerard Gannon Properties.

Clongriffin is unique in that significant public transport and infrastructure has already been provided whereby residents will be within walking distance of both bus and train services and indeed within walking distance of community facilities including 2 existing community rooms at Clongriffin Hub and Clongriffin Junction which host local community meeting and weekly activities such as yoga classes and children's singing and dancing. Residents are also within walking distance of Trinity Sports and Leisure centre which provides the local community with facilities such as a swimming pool, sporting hall, lounge areas, darts and pool lounge etc. This is in addition to the outdoor facilities provided within Father Collins Park such as a children's playground and outdoor skate park. There are also existing childcare facilities within Clongriffin (in addition to the three no. additional units proposed) and existing educational facilities. A Community and Social Audit has been prepared and is submitted with this application which demonstrates the existing community and social provision within Clongriffin.

Therefore, it is submitted that the proposed 1,950 build to rent and build to sell units as well as the additional retail/commercial and community facilities will support the principles of Sustainable Urban Neighbourhoods and will support policy QH6 and QH18 of the Development Plan which seeks to:

"QH6: To encourage and foster the creation of attractive mixed-use sustainable neighbourhoods which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities, and which are socially mixed in order to achieve a socially inclusive city.

QH18: To promote the provision of high-quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood, in accordance with the standards for residential accommodation."

It is important to note, that to date, the predominant tenure within Clongriffin has been private purchase of residential units. There has been no large scale development provided to date solely for the rental market. The current proposed development provides for long term rental units as well as apartments for the private market and when considered in the context of the overall development of Clongriffin which has been predominately private dwellings, and the Clongriffin Masterplan, the currently proposed tenure and apartment mix is considered an appropriate form of development which will support the principles of sustainable communities.

4.0 Justification for Build To Rent

The proposed development subject to the current applications provides for 1,130 Build to Rent units, 625 build to sell units and 195 Part V units. Noting the scale of the proposed development and the quantum of Build to Rent tenure within the overall development, Downey Planning have set out a justification for the Build to Rent element of the development, which is set out below:

4.1 Policy Justification

The scale of the proposed build-to-rent tenure is acknowledged and Downey Planning hereby outline the rationale for the proposed development.

In the first instance, the 'Sustainable Urban Housing: Design Standards for New Apartments (2018)' confirm that there is a requirement for *"a new format of residential accommodation has the potential to emerge as a distinct segment within the overall urban accommodation sector"*. This has been government policy since the publication of the 'Rebuilding Ireland, An Action Plan for Housing and Homelessness' was published in 2016, which sought to provide for a more vibrant and responsive private rented sector. Providing for a more vibrant and responsive private rented sector, which includes build-to-rent, is in accordance with the following core objective of the Rebuilding Ireland document: *"Maturing the rental sector so that tenants see it as one that offers security, quality and choice of tenure in the right locations and providers see it as one they can invest in with certainty"*.

Rebuilding Ireland is highly supportive of the build-to-rent tenure format and acknowledges that at the time of the document being prepared (2016), the housing stock in Ireland was not built with the needs of long-term renters in mind and as such there was a need for the construction of purpose-built accommodation for the long-term rental market with appropriate on-site amenities. Pillar 4 of Rebuilding Ireland specifically seeks to *'Improve the Rental Sector'*. The key objective of this Pillar is *"addressing the obstacles to greater private rented sector delivery, to improve the supply of units at affordable rents"*. A key action for achieving this objective is to encourage 'build-to-rent'.

Section 5 of the Sustainable Urban Housing: Design Standards for New Apartments (2018) specifically support and address build-to-rent developments. It defines BTR's as:

"Purpose-built residential accommodation and associated amenities built specifically for long-term rental that is managed and serviced in an institutional manner by an institutional landlord."

These guidelines generally view BTR's as developments of several hundred units that are designed and constructed specifically for the needs of the rental sector. The guidelines acknowledge that BTR developments have the potential to accelerate housing construction, which makes a significant contribution to the required increase in housing supply nationally, which has still to reach the targets set by Rebuilding Ireland and increased urban housing provision that is envisaged within the National Planning Framework.

In light of the foregoing, there is clear planning policy support and justification for the provision of build to rent tenure as part of this development.

4.2 Population Justification

According to the CSO census, 29% of the Irish population now rent, with higher proportions within the main cities, including Dublin. There is an anticipated growth of 17% in Ireland's population by

2031 with 63% being within the 25-35 age bracket. This significant increase in population for this key age cohort would generate additional demand for new homes, particularly apartments.

4.3 Employment Justification

The subject lands are ideally located within close proximity to significant employment areas. These employment areas and centres include:

- Clongriffin town centre;
- Dublin City Centre (direct train access from Clongriffin);
- Northern Cross;
- Clarehall;
- Ballydoyle Industrial Estate;
- Clonshaugh Industrial Estate and,
- Dublin Airport.

The proximity of the subject lands to these large employment centres, coupled with its accessibility to Dublin City Centre and other employment centres around the M50 ensures that it is ideally located to attract workers who want to rent in professionally managed schemes that are conveniently located to their place of work.



Fig. 2 – Aerial view of subject site in context of large employment centres

CEO's of large companies, and multi-national companies in particular, are continuously highlighting the shortage of suitable accommodation for their workers as a key area of concern and item to consider when choosing possible new business locations or expansion opportunities. It is also a consideration for employees when choosing where to work.

4.4 Market Justification

LIV Consult, having extensive experience in the BTR market in both the UK and Ireland have prepared this section of the report. According to recent census data from the CSO, 29% of Ireland's population is now renting with higher rents within Dublin (36%) and the other main cities. The rate

of growth in apartment living has also increased at a higher level than that of any other housing type, accounting for 12% of all households nationally in the 2016 census of population. Within Dublin, the rate of growth in apartment living is higher than any other type of housing nationally and witnessed an increase of almost 89% from the 2002 census figures. This indicates that the Dublin apartment market is more buoyant than the remainder of the country with a significant shortfall of supply that fails to meet demand.

According to a recent Linesight report (*'The Build-to-Rent Sector in Ireland, Analysis and perspectives from key industry stakeholders'*, November 2018), there is a clear trend in Dublin towards renting in comparison to home ownership. The total numbers of households renting has grown considerably between 2002 and 2016.

The BTR development concept is well established in other European countries, whereas it is only in its infancy in Ireland at present but is experiencing a rapid increase in popularity and delivery. According to the recent Linesight report, there are clear demographic drivers that support the expansion of the BTR market, such as population considerations (discussed above). The BTR model responds to increased demand for secure and longer-term rental properties among the 25-44 age cohorts.

The BTR model provides benefits to the wider housing market as it can bring more housing units to market quicker and at a greater scale than that of the traditional build to sell model. There is also a greater market demand for higher density apartment living in comparison to other parts of the country and BTR developments are perfectly suited to meet this demand in the market place.

From a developer perspective, the BTR model provides for greater financial security and therefore viability for a development as institutional investors seek long-term, inflation-tracking returns on investments, such as BTR developments. The BTR development model also offers cost saving to developers that ensures that such developments will be developed quickly and thus provide the necessary housing units into the market.

Market intelligence prepared by LIV Consult notes vacancy of approximately 1% in Dublin based on data provided by Daft.ie in comparison to Census statistics relating to Private Rented Sector properties. This is significantly lower than globally-accepted natural vacancy of 5%. At the levels of vacancy experienced by Dublin in recent years, significant rent growth is experienced by the market.

The welcomed response by the Government relating to the Rent Pressure Zone (RPZ) which caps yearly increases to rents at 4% per annum.

4.4.1 Market Intel and Pipeline

Within the 'Rebuilding Ireland' (2016) initiative, it is the intention of Dublin City Council to deliver a target of 25,000 housing units by 2020, which is required to increase to 30,000-35,000 up to 2027 to address the supply deficit of homes that has increased since 2010. According to recent CSO data, a total of 14,616 residential completions have taken place in Dublin (across all D postcodes) between 2012 and 2018. To focus this further, Clongriffin is located in North Dublin, which when combined with North of Dublin City Centre, has collectively gained 3,852 dwellings within this time frame and experienced a dip in the number completions between 2017-2018. While a large volume of these

completions is likely to be for sale dwellings, the delivery of BTR intends to balance this out and address Dublin’s under-supply of housing.

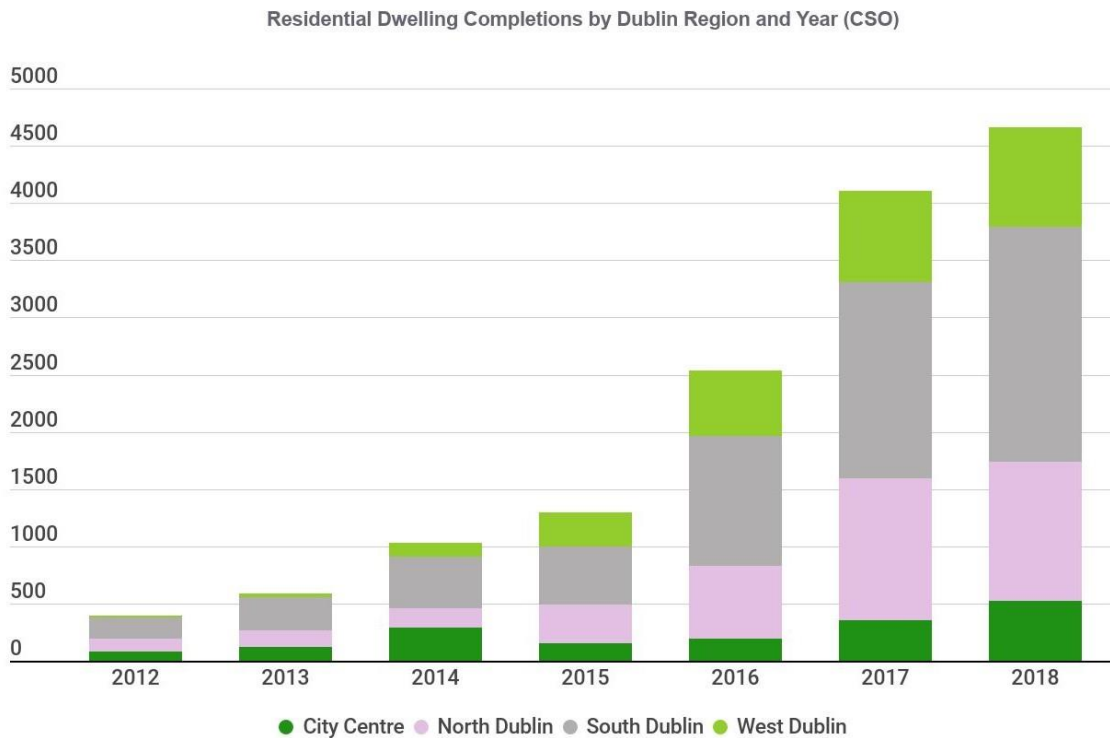


Fig. 3 –Residential Dwelling Completions by Dublin Region and Year (CSO)

LIV Consult is continually tracking the entire development pipeline across the whole of Dublin including all of the major BTR and Private Residential construction starts in the city and all developments submitted to the Bord. Currently, the rental pipeline stands at 29,638 for Dublin and the Greater Dublin commuter areas. Conservatively, this pipeline will be delivered – pending funding from institutions and private equity sources – by 2023 at the earliest. We would, however, caveat that this number may trend upwards as the volume of product forward-sold or committed to by institutions in a bulk sale fashion during the course of the next 18-24 months.

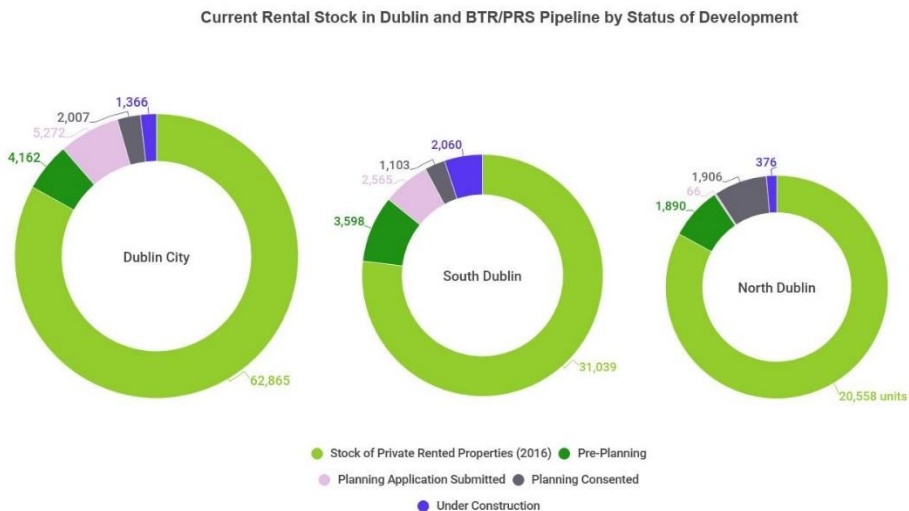


Fig. 4 – (CSO) Current Rental Stock in Dublin (CSO, 2016) and BTR/PRS Pipeline by Status of Development

To break this down by region, the pipeline for the whole of North Dublin comprises 4,238 units. Corresponding to the number of completions, this is less than the South of Dublin which has a pipeline of 9,326 units and Dublin City Centre with 12,927 units. The charts above illustrate how the pipeline of development in North of Dublin is much smaller relative to pipeline coming forward across the City Centre and Southern suburbs.

The following map provides a snapshot of some of the Northern Dublin pipeline and existing purpose-built rental stock, which is generally focused around the Northwood and Santry area, in addition to Clongriffin and Donaghmede. As the Northern suburbs are not served by the central LUAS line system, the DART train is a popular route of transport into the City Centre. Many of the pipeline schemes, Clongriffin included, will benefit from this service into Dublin and northwards, while others will be better served by the city's bus routes.

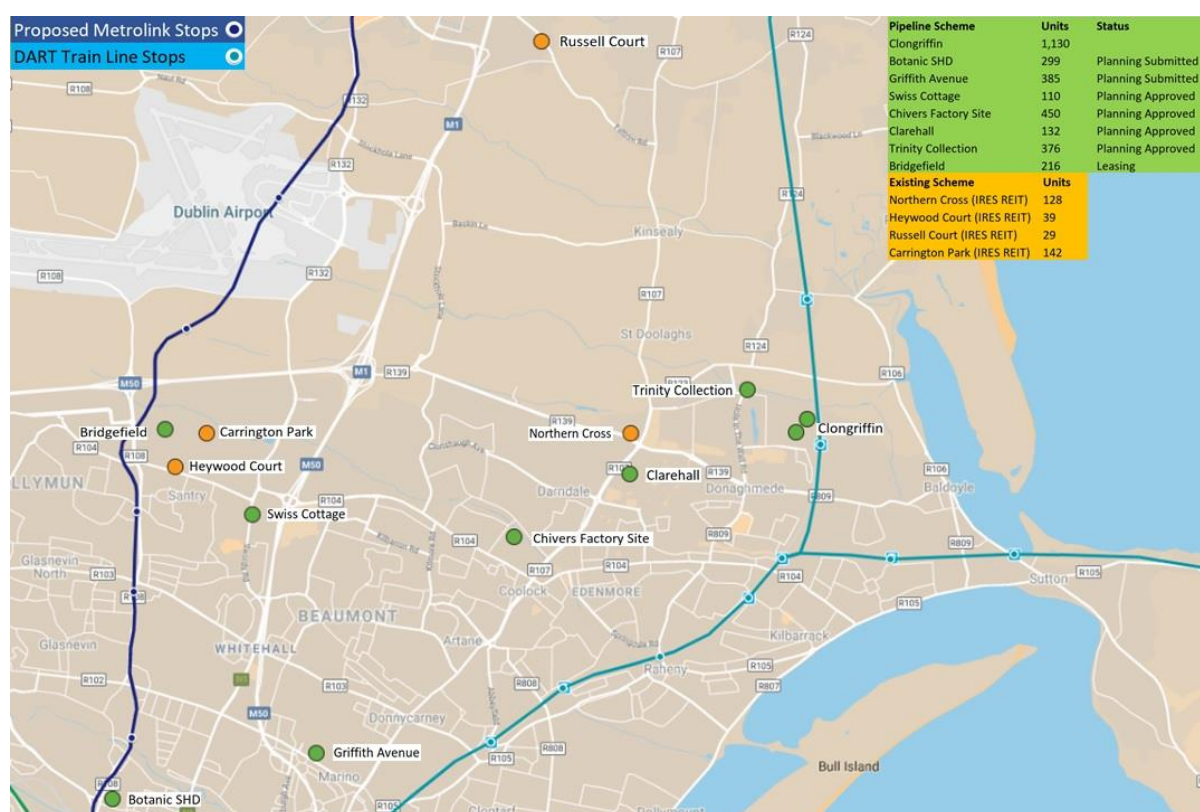


Fig. 5 – Build to Rent Pipeline- Source: LIV Consult (2019)

On the other side of the Clongriffin rail tracks is a 125-acre plot, 'Project Shoreline' that's currently for sale in Baldoye. Subject to planning, there is the potential for the project to deliver approximately 1,600 homes of which 546 units and 1,917sqm of commercial accommodation are currently consented. This is significant in terms of proximity to Clongriffin and the scale of the neighbourhood that could be created here.

In support of Dublin City Council's commitment to creating sustainable neighbourhoods that are within walking distance from public transport facilities, LIV Consult summarise the following:



63%

Pipeline units within 1km of a LUAS stop



20%

Pipeline units within 1km of a DART stop

Dublin's BTR/PRS pipeline schemes are generally well-located for the city's main public transport links. The Clongriffin SHD sits amongst the 20% of schemes within 1km of a DART stop (c.300m away), which when compared to the rest of the Northern Dublin rental pipeline is extremely positive. While the proposed Metro-link will enhance connectivity further for North Dublin, it is projected to not be completed in full until 2027. The Clongriffin SHD can therefore be considered one of the best-connected rental schemes in both the Northern and suburban Dublin pipeline.

In terms of local competitors, there is clearly a lack of existing purpose-built rental accommodation available in the Northern suburbs, with only one existing scheme in close proximity to Clongriffin which is Northern Cross (128 units). Within 1 mile of the Clongriffin SHD, the BTR pipeline is limited to one scheme:

Scheme	Units	Developer/Funder	Status	Expected Completion	BTR/Private Resi
Trinity Collection	376	Twinlite/Tristan Capital	Under Construction	2020	BTR

Table 1 Source: LIV Consult (2019)

4.4.2 Rent Growth

The lack of rental supply and growing demand in Dublin is weighing heavily on rents across the city. As summarised in the Daft.ie rental report for Q1 2019, rents in Dublin have grown 6.8% over the past year. Daft.ie forecast that around 80,000 rental homes would need to be built immediately in Dublin to address this imbalance, with emphasis placed on the delivery of institutionally owned, purpose-built rental accommodation. Liv Consult have also informed the Daft.ie 'Rental Price Report for Q2 2019' which has just been published and provides an analysis of recent trends in the Irish Rental Market. The report notes that the demand for rental properties including BTR is high and that there are roughly 25,000 new BTR rental homes being planned or being built and this total compares with an estimate'd shortfall of closer to 70,000 rental homes in Dublin. The report also notes that Build-to-rent (BTR) is an emerging sector in the Irish property market, but is already well established in other countries. Ownership and management of these developments is often carried out by a single entity and there are a number of characteristics that differentiate BTR developments from the traditional development model; such as the provision of dedicated amenities and facilities tailored to residents at all stages of life. The addition of communal areas, such as workspaces and playgrounds for children, increased flexibility, high quality building structures and a sense of community appeal to residents who are looking for long-term rental homes.

4.4.3 Summary

The Clongriffin SHD has the potential to support the increasing demand and under supply of rental properties in Dublin. LIV Consult recommend that a scheme of this scale should be delivered in phases in order to prevent over-supply to this area of the market in North Dublin. The lack of comparable private rental stock in the pipeline for North Dublin provides justification for a large-scale BTR development in Clongriffin, supported by its limited local competitors and strong transport links into the City Centre.

4.5 Proposed Build to Rent Units

The proposed development will provide for a mixed-tenure development. While BTR forms the largest element of the development, it will also comprise private build to sell units, as well as units for social housing. This will ensure that the proposed development will cater and provide for a range of different household typologies in a sustainable and community-based manner.

Section 5 of the Sustainable Urban Housing Design Standards for New Apartments sets out the requirements of Build to Rent Developments. The Guidelines notes that large-scale apartment developments that are designed and constructed specifically for the needs of the rental sector are a prominent feature of housing provision in many countries. The proposed Build to Rent units subject to the current applications have been designed in accordance with these guidelines including the following characteristics:

- The proposed units will be owned and managed by a single entity such that individual units will not be sold off separately for private ownership but will provide for long term rental and security for those in the rental market.
- The proposed units have been designed with a significant quantum of dedicated amenities and facilities specifically for use of residents which will create a shared environment integrating individual renters into the Clongriffin area.
- The design of the proposed BTR blocks ensures that the delivery of BTR units will be available to the rental sector quicker than units for the private market. The delivery of 1,130 units will make a significant contribution to the required increase in housing supply nationally.

The Guidelines also state that the promotion of BTR development by Planning Authorities is therefore strongly merited through specific planning and design policies and standards and these are set out within the Guidelines. There are two Specific Planning Policy Requirements pertaining to Build to Rent Units as set out in the Apartment Guidelines – SPPR 7 and SPPR 8.

Where the requirements of SPPR 7 are fulfilled, the proposed BTR scheme will qualify for the assessment of the planning authority where a number of distinct planning criteria may be applied as set out in SPPRA 8. In this regard, it is submitted that the proposed BTR units comply with SPPR 7 which states:

Specific Planning Policy Requirement 7**BTR development must be:**

- (a) Described in the public notices associated with a planning application specifically as a 'Build-To-Rent' housing development that unambiguously categorises the project (or part of thereof) as a long-term rental housing scheme, to be accompanied by a proposed covenant or legal agreement further to which appropriate planning conditions may be attached to any grant of permission to ensure that the development remains as such. Such conditions include a requirement that the development remains owned and operated by an institutional entity and that this status will continue to apply for a minimum period of not less than 15 years and that similarly no individual residential units are sold or rented separately for that period;
- (b) Accompanied by detailed proposals for supporting communal and recreational amenities to be provided as part of the BTR development. These facilities to be categorised as:
 - (i) **Resident Support Facilities** - comprising of facilities related to the operation of the development for residents such as laundry facilities, concierge and management facilities, maintenance/repair services, waste management facilities, etc.
 - (ii) **Resident Services and Amenities** – comprising of facilities for communal recreational and other activities by residents including sports facilities, shared TV/lounge areas, work/study spaces, function rooms for use as private dining and kitchen facilities, etc.

Fig. 6 – Extract of SPPR7 of the Sustainable Urban Housing Design Standards for New Apartments

In accordance with SPPR 7(a), the proposed BTR units are clearly set out within the newspaper notices as Build To rent Units and will be subject to a long-term covenant or legal agreement that the BTR status will be in place for a period of not less than 15 years and that no individual units will be sold or rented separately within that period. Please refer to the draft legal covenant that accompanies the applications confirming same.

In accordance with SPPR 7(b) of the 2018 Apartment Guidelines and Section 5.5 of the Guidelines, the proposed BTR units will be suitably provided with both Resident Support Facilities and also Resident Services and Amenities as follows:

Resident Support Facilities:

- Concierge areas;
- Management offices;
- Waste management areas;
- Storage areas for bulky goods and bicycles; and,
- Postal rooms.

Resident Services and Amenities:

- Resident lounges;
- Multi-use rooms;
- Guest suites;

- Gym and exercise suites; and,
- Work-zones for residents.

A breakdown of the units proposed for Build to Rent and their associated facilities is set out as follows:

Block	Number of Units	Total Quantum BTR Facilities (Sq.m.)	Sq.m per apartment unit	Type of Facilities
4	74	204.5 sq.m. (Support Facilities – 71 sq.m. Services and amenities – 133.5 sq.m)	2.8 sq.m	Concierge, residents work/study zone, guest suite, bulk store, games room, resident's amenity room, residents meeting room, laundry room etc.
6	270	794.7 sq.m. (Support Facilities – 147.6 sq.m. Services and amenities – 647.1 sq.m)	2.9 sq.m	Residents lounge area, storage, maintenance suite, meeting rooms x 2, function room, concierge, office, cinema room, changing rooms/toilets, resident's gym etc.
13	187	540.2 sq.m. (Support Facilities –210.5 sq.m. Services and amenities – 329.7 sq.m)	2.9 sq.m	Concierge, bulk store, Laundry room, parcel store, conference room, games room, resident's gym, resident's amenity room, residents study rooms etc.
14 (b)	191	745 sq.m. (Support Facilities –295 sq.m. Services and amenities – 450 sq.m)	3.9 sq.m	Residents gym, cinema room, multimedia room, residents function room, meeting room, resident's business room, bulk storage, laundry, concierge, etc.
17	210	589.8 sq.m. (Support Facilities –157.8 sq.m. Services and amenities – 432 sq.m)	2.8 sq.m	Concierge, bulk store, games room, resident's amenity rooms, laundry, etc.

25	63	159.4 sq.m. (Support Facilities –44.8 sq.m. Services and amenities – 114.6 sq.m)	2.5 sq.m	Concierge, storage, maintenance suite, lounge and workspace, function room, etc.
26	78	325.9 sq.m. (Support Facilities –78.1 sq.m. Services and amenities – 247.8 sq.m)	4.2 sq.m	Resident's gym, meeting room, function room, cinema/media room, office, reception, lounge, changing rooms etc.
27	57	175.1 sq.m. (Support Facilities – 15.7 sq.m. Services and amenities – 159.4 sq.m)	3.1 sq.m	Residents lounge/workspace, function room, concierge & office, etc.
Total	1,130	3,534.6 sq.m	3.13 sq.m	

Please also refer to Appendix 1 for a full breakdown and illustrations of the residential amenity facilities proposed within each of the aforementioned BTR units. It must also be noted that there are resident amenities also proposed within the remainder of the blocks that are denoted as BTS in addition to existing amenity facilities and additional amenities proposed as part of the overall applications.

It is submitted that the proposed Build To Rent facilities are of high quality with meeting rooms, gyms, laundry rooms, postal rooms, concierges, storage spaces etc., proposed that are easily accessible to residents. The BTR facilities are also supported by facilities such as toilets and changing rooms allowing residents to avail of the facilities without having to return to their apartments for toilets etc. The design of the spaces has also been carefully considered by the design team ensuring adequate space is provided within each block for increase comfort of residents as well as ease of access. A range of amenity rooms such as gyms, tv/media rooms, study spaces, functional rooms etc. have been provided and thus it is considered that the proposed development provides for a high quality of amenity space in conjunction with support facilities such as laundry services, concierge and storage facilities such that the quantum and quality of build to rent facilities exceeds the requirements of SPPR 7.



Private Dining Area



Private Meeting Room



Resident's Workspace



Reception Lounge



Resident's Lounge Area



Resident's Lounge Area

Fig. 7 – Proposed BTR Residents Amenity and support facilities

SPPR 8 states:

Specific Planning Policy Requirement 8

For proposals that qualify as specific BTR development in accordance with SPPR 7:

- (i) No restrictions on dwelling mix and all other requirements of these Guidelines shall apply, unless specified otherwise;**
- (ii) Flexibility shall apply in relation to the provision of a proportion of the storage and private amenity space associated with individual units as set out in Appendix 1 and in relation to the provision of all of the communal amenity space as set out in Appendix 1, on the basis of the provision of alternative, compensatory communal support facilities and amenities within the development. This shall be at the discretion of the planning authority. In all cases the obligation will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity;**
- (iii) There shall be a default of minimal or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or proximity to public transport services. The requirement for a BTR scheme to have a strong central management regime is intended to contribute to the capacity to establish and operate shared mobility measures;**
- (iv) The requirement that the majority of all apartments in a proposed scheme exceed the minimum floor area standards by a minimum of 10% shall not apply to BTR schemes;**
- (v) The requirement for a maximum of 12 apartments per floor per core shall not apply to BTR schemes, subject to overall design quality and compliance with building regulations.**

Fig. 8 – Extract of SPPR8 of the Sustainable Urban Housing Design Standards for New Apartments

- (i) The proposed build to rent units provides for a mix of units with 423 no. 1 beds, 618 no. 2 beds, 44 no. 3 beds and 45 no. studios. This provides for 41% one beds/studio units, 55% two bed units and 4% three bed units. It is considered that this mix is an appropriate mix of units for the proposed BTR units and is in accordance with the aforementioned guidelines.
- (ii) All of the proposed build to rent units have been provided with storage in excess of the minimum requirement for storage. For example, a typical 1 bedroom unit requires 3 sq.m. of storage and in many instances 4-4.5 sq.m. is provided. A two-bedroom unit requires 6 sq.m. and this is provided at a minimum. With regards to private amenity space, all BTR units are provided with balconies in excess of the minimum floor areas set out in Appendix 1 of the Guidelines. This is set out on the detailed schedule of accommodations for each proposed BTR block that are enclosed with these applications. In addition, communal open space is also provided in accordance with the standards and

indeed in many instances significantly exceeds the communal open space requirement for same. Please refer to the individual design statements and schedule of accommodations for each of the BTR Blocks for the proposed developments compliance with the above guideline.

- (iii) The proposed car parking for the overall development of the Clongriffin lands has been prepared by Waterman Moylans and is set out in the Car Parking Rationale documentation enclosed with the applications. The car parking provision has been agreed with the Planning Authority and is considered an appropriate quantum of car parking given the central location of the blocks in close proximity to the town centre of Clongriffin, to the Clongriffin Train Station and indeed to bus services utilising the Quality Bus Corridors. The proposed BTR blocks are therefore highly accessible within a town centre location and the proposed car parking is considered an appropriate quantum for the subject lands. Please refer to the enclosed car parking rationale document for further details.
- (iv) The guidelines note that for BTR units that the requirement for the majority of units to exceed 10% of the minimum floor area does not apply. In this instance, the proposed development comprises 1,022 BTR units exceeding the minimum floor area of an apartment by 10%. This equates to nearly 90% of all the BTR units exceeding the minimum floor area by 10%.
- (v) The proposed Build to Rent units are proposed in with 12 or less units per core as per the architectural drawings submitted with this application. This is in line with building regulations.

In light of the above, it is considered that the proposed Build to Rent Blocks and associated units proposed within Clongriffin accords with the requirements for Build to Rent as set out in the Apartment Guidelines 2018.

In addition to the build to rent amenities and facilities as set out above, there is also to be 3 no. childcare facilities provided as part of the development within Blocks 4, 6, and 27. This will provide for appropriate childcare facilities to cater for the future residents of the development. There are also a range of community facilities located in the immediate vicinity of the lands, including the community rooms at Clongriffin Hub and Clongriffin Junction, Clongriffin Town Centre, schools and open spaces/recreational facilities including Trinity Sports and Leisure Club and Fr. Collins Park that will provide further amenities and add to the sustainable neighbourhood character of the development. These community facilities are outlined in detail within the Community and Social Infrastructure Audit that has been prepared by Downey Planning and is submitted under separate cover.

The proposed development will also be provided with high-quality communal areas of open space as well as public open space, including children's play grounds that will offer suitable recreational and amenity facilities for residents.

In light of the above, it is considered that the proposal is consistent with Section 5 of the Sustainable Urban Housing: Design Standards for New Apartments (2018) and is consistent with Development Plan policies pertaining to the provision of sustainable neighbourhoods.

5.0 Conclusion

In considering the above factors, it is respectfully considered that the proposed development, including the BTR element of the scheme, is justified, not only from a need and demand perspective, but also that it will help to create a sustainable neighbourhood within Clongriffin that will help to complement and revitalise the town, and as such it is submitted that the proposed development is in accordance with the proper planning and sustainable development of the area.

Appendix 1 BTR Amenities and Facilities Floor Plans

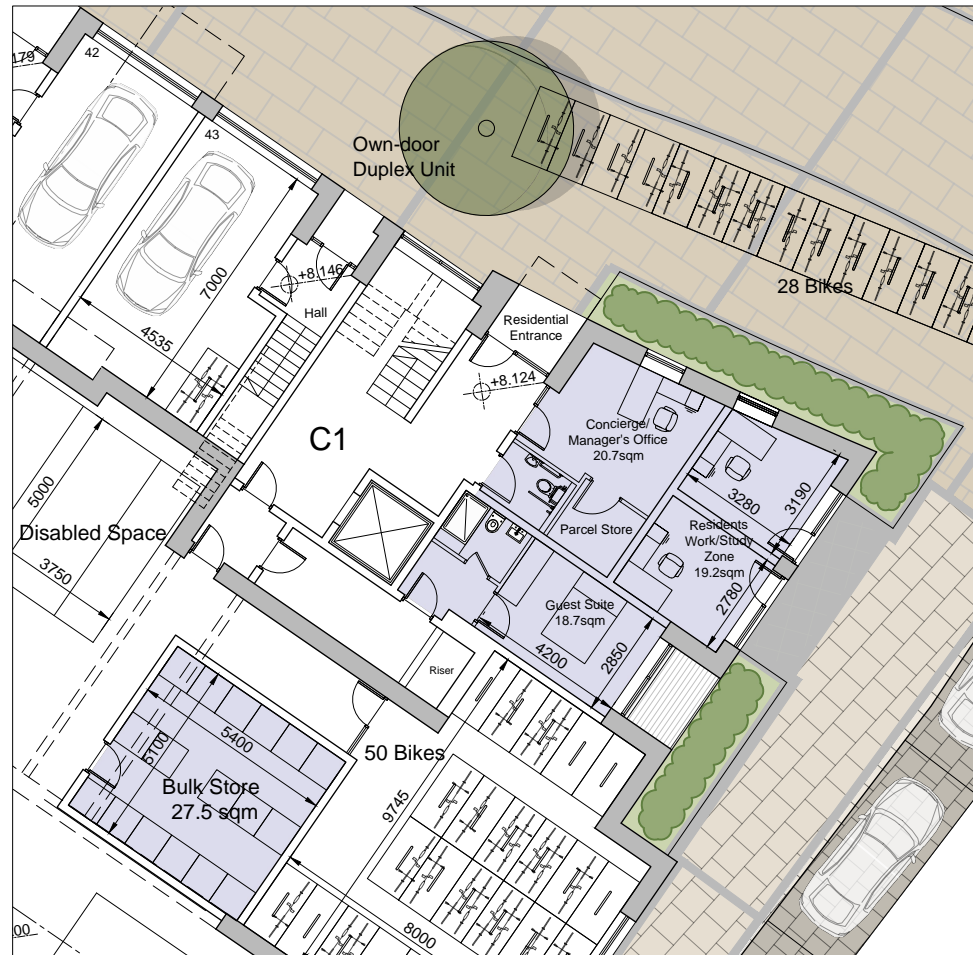
Clongriffin Block 4

Build to Rent - 74 Units

204.5 m² BTR amenity space

2.8 m² BTR amenity space/unit

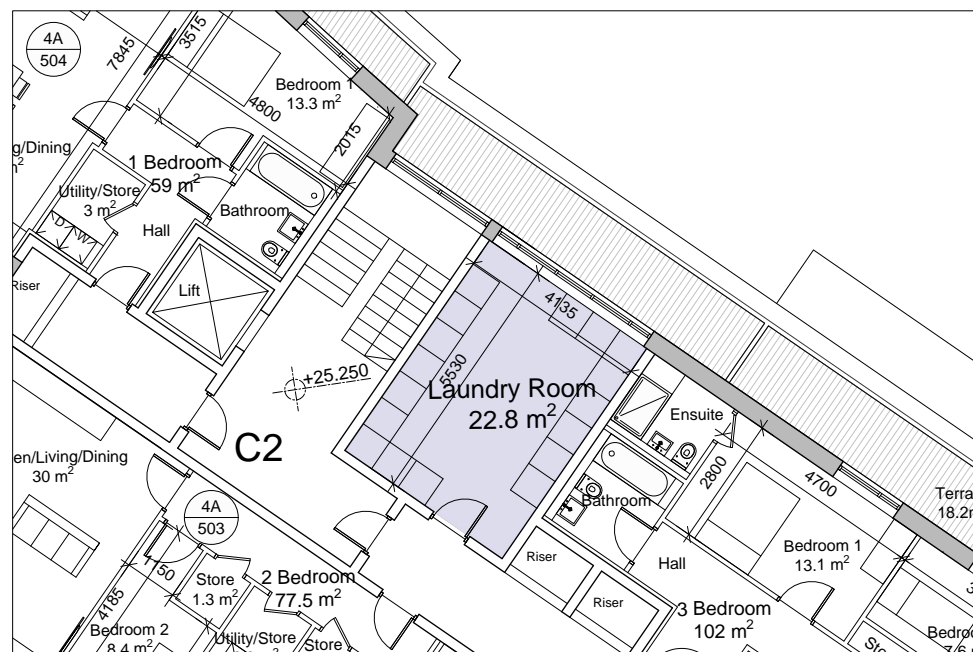
Residential Support Facilities	Sq.m.	Residential Services & Amenities	Sq.m.	Summary	Sq.m.
Concierge/Manager's Office (GF)	20.7	Residents Work/Study Zone (GF)	19.2	Residential Support Facilities	71
Laundry Room (5F)	22.8	Guest Suite (GF)	18.7	Residential Services & Amenities	133.5
Bulk Store (GF)	27.5	Residents Amenity Room (1F)	45.6	Total	204.5
Total	71	Games Room (1F)	27.2		
		Residents Meeting Room (5F)	22.8		
		Total	133.5		



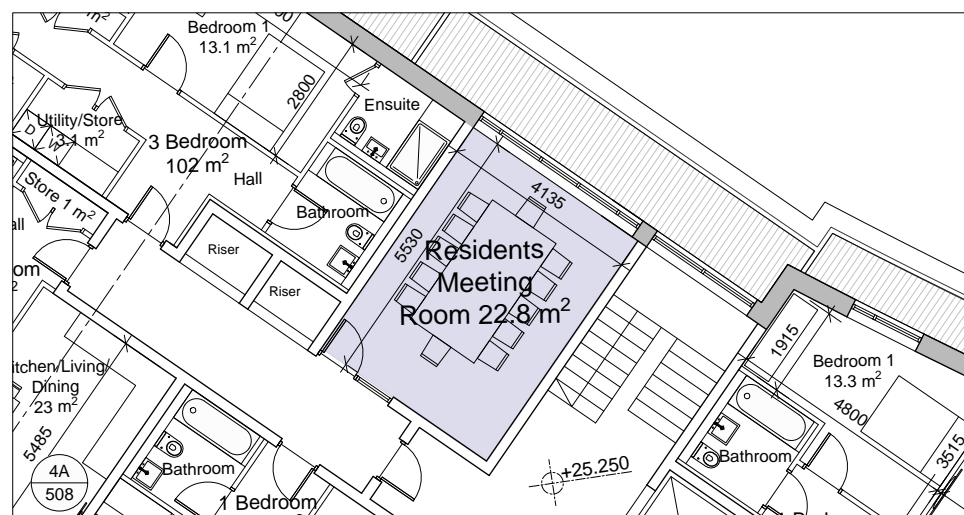
Ground Floor Level



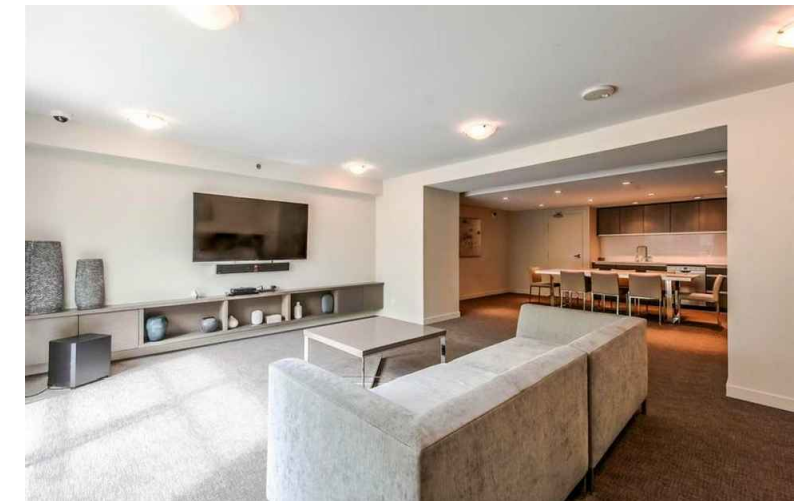
Podium Level



5th Floor/Penthouse Level



5th Floor/Penthouse Level



Residents' Amenity Room

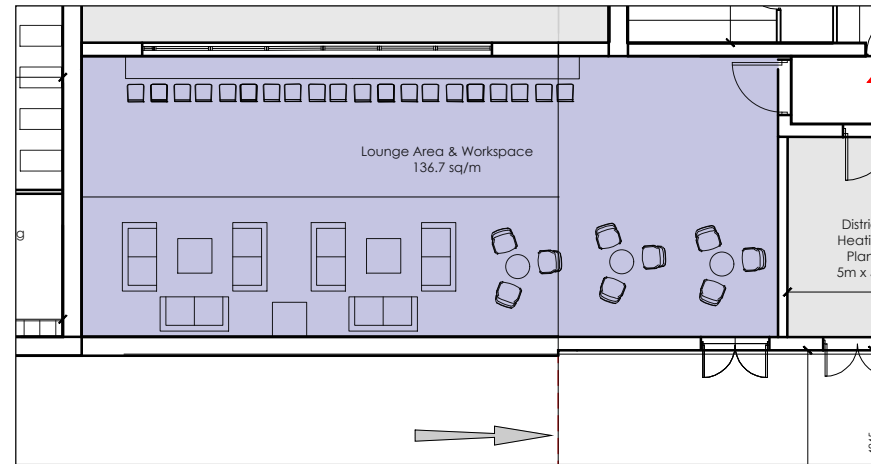


Residents' Meeting Room

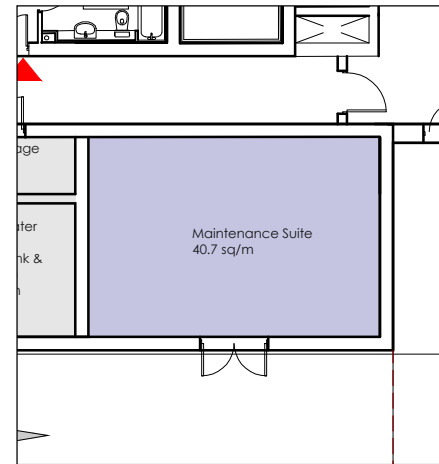


Residents' Laundry

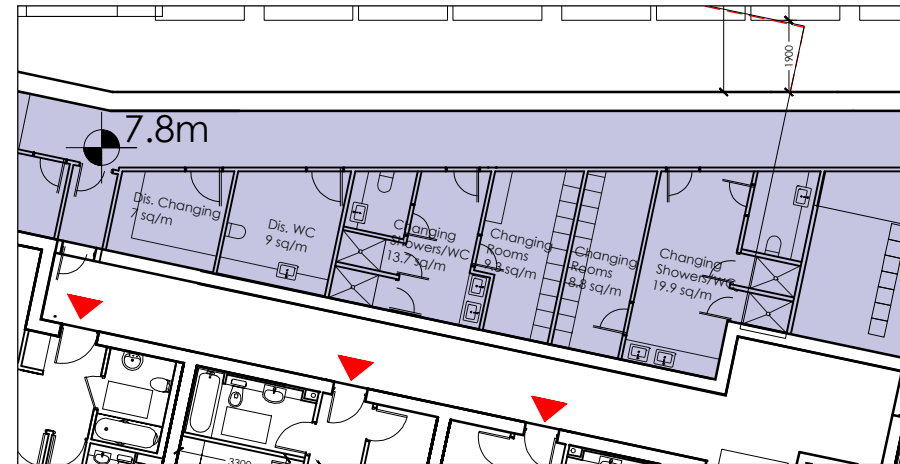
CLONGRIFFIN BLOCK 06 - 270 Units - 794.7 sq/m Amenity Space - 2.9 sq/m Amenity/Unit



Resident's Lounge Area
Scale 1:200



Storage
Scale 1:200

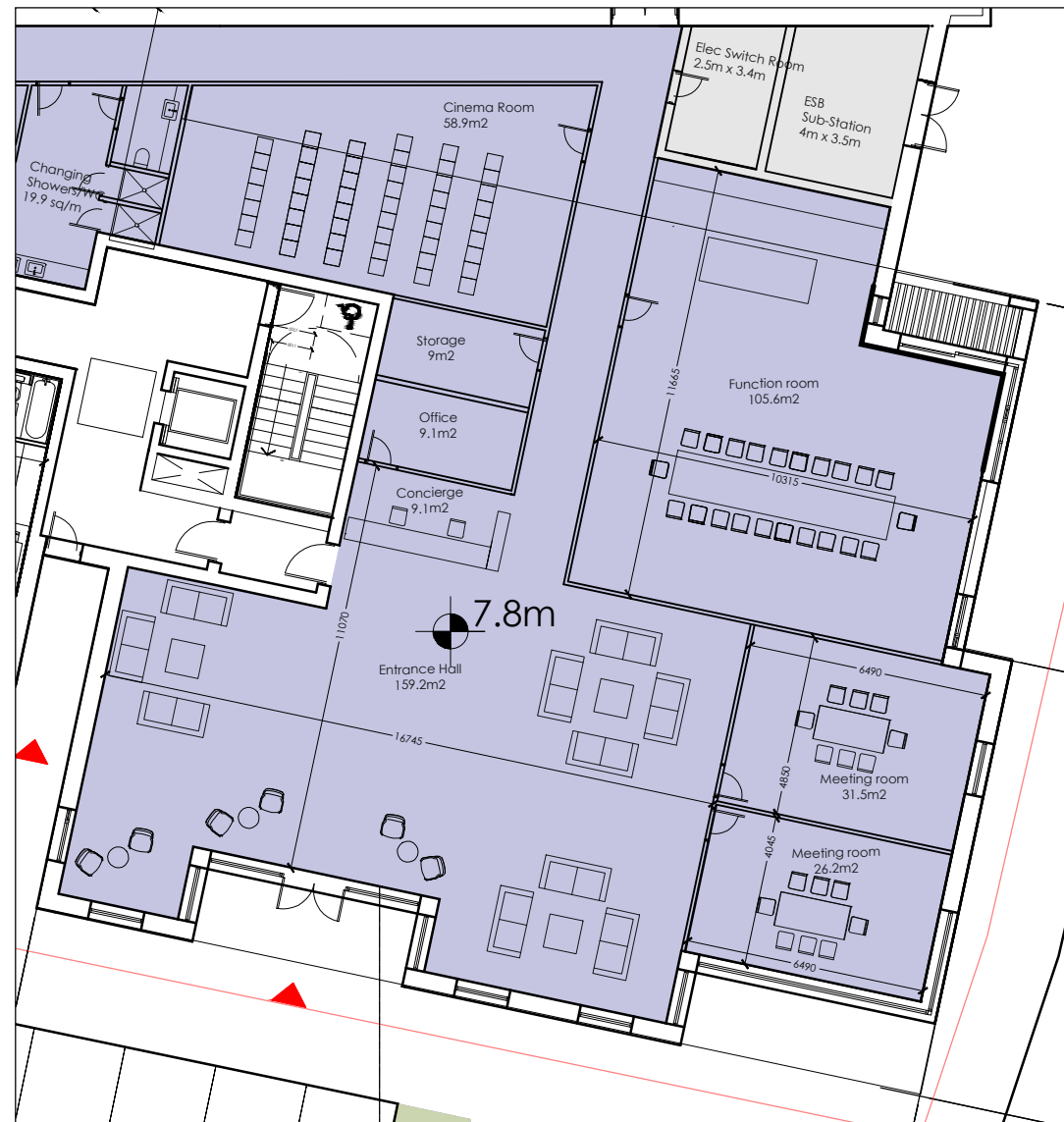


Changing Areas
Scale 1:200

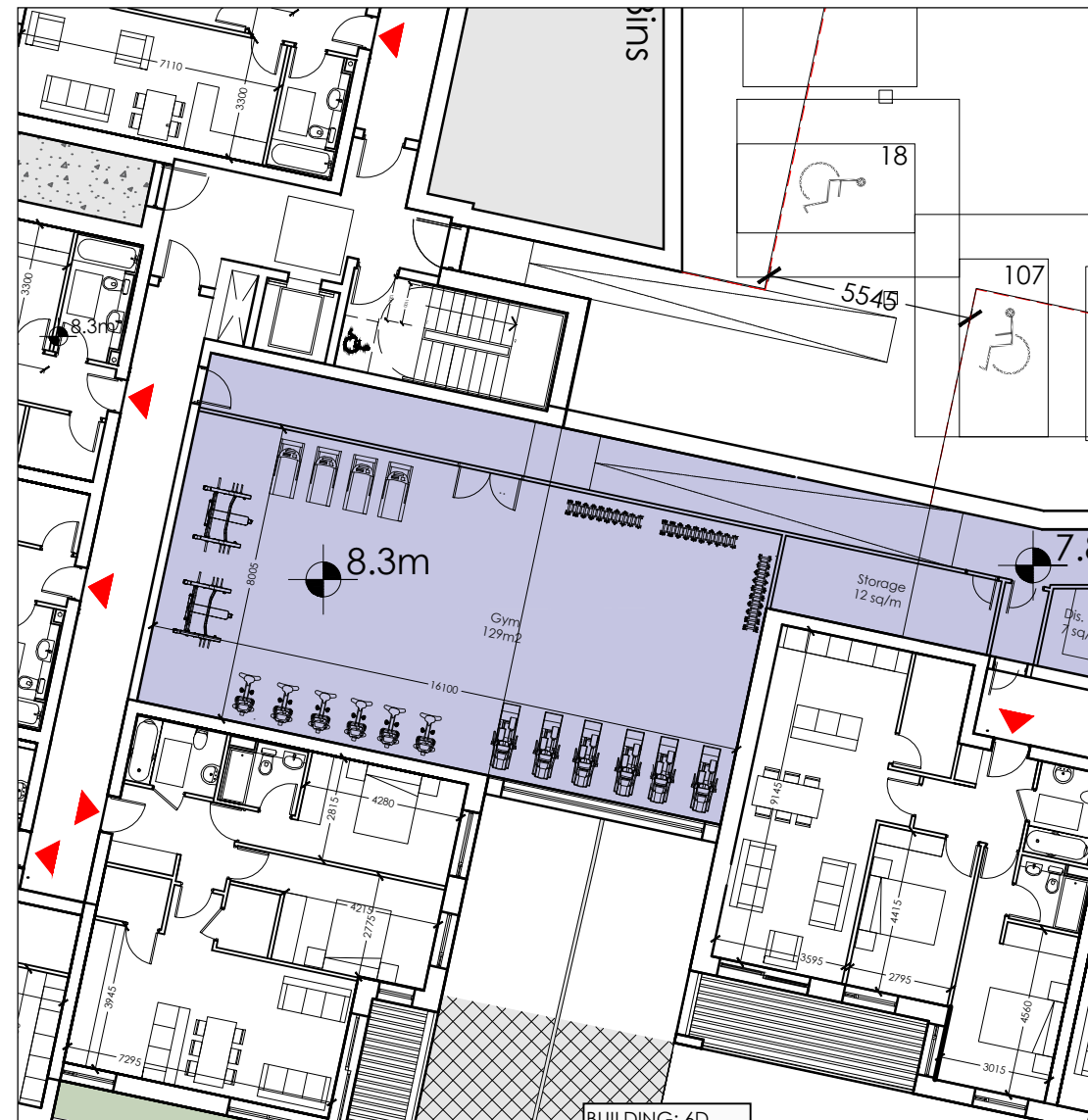
B06 AMENITY SPACE SUMMARY

Resident's Lounge Area:	136.7
Storage (overall):	21
Maintenance Suite:	40.7
Lobby:	159.2
Meeting Room x2:	57.7
Function Room:	105.6
Concierge:	9.1
Office:	9.1
Cinema Room:	58.9
Female Changing/W.C:	28.7
Male Changing/W.C:	23
Disabled Changing/W.C:	16
Gym:	129

TOTAL AMENITY SPACE: 794.7



Entrance Hall, Meeting/Function Rooms, Storage, Concierge, Office, Cinema Room
Scale 1:200



Gym, Storage
Scale 1:200



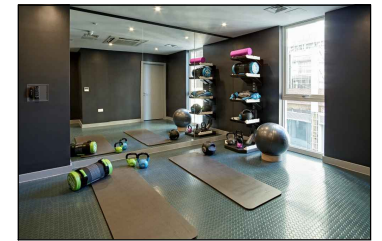
Reception Lounge



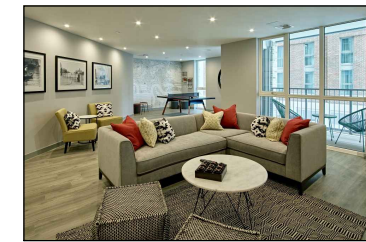
Concierge Desk



Resident's Gym



Resident's Gym



Resident's Lounge



Resident's Lounge



Resident's Workspace



Private Meeting Room

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BLOCK 06 CLONGRIFFIN DUBLIN 13		AMENITY SPACE	
SCALE 1:200 @ A3	DATE MAR 19	DRAWN BY CG	DESIGNED BY PH
REVISION NO. A		DRAWING NO. 1825 - B06 - 700	

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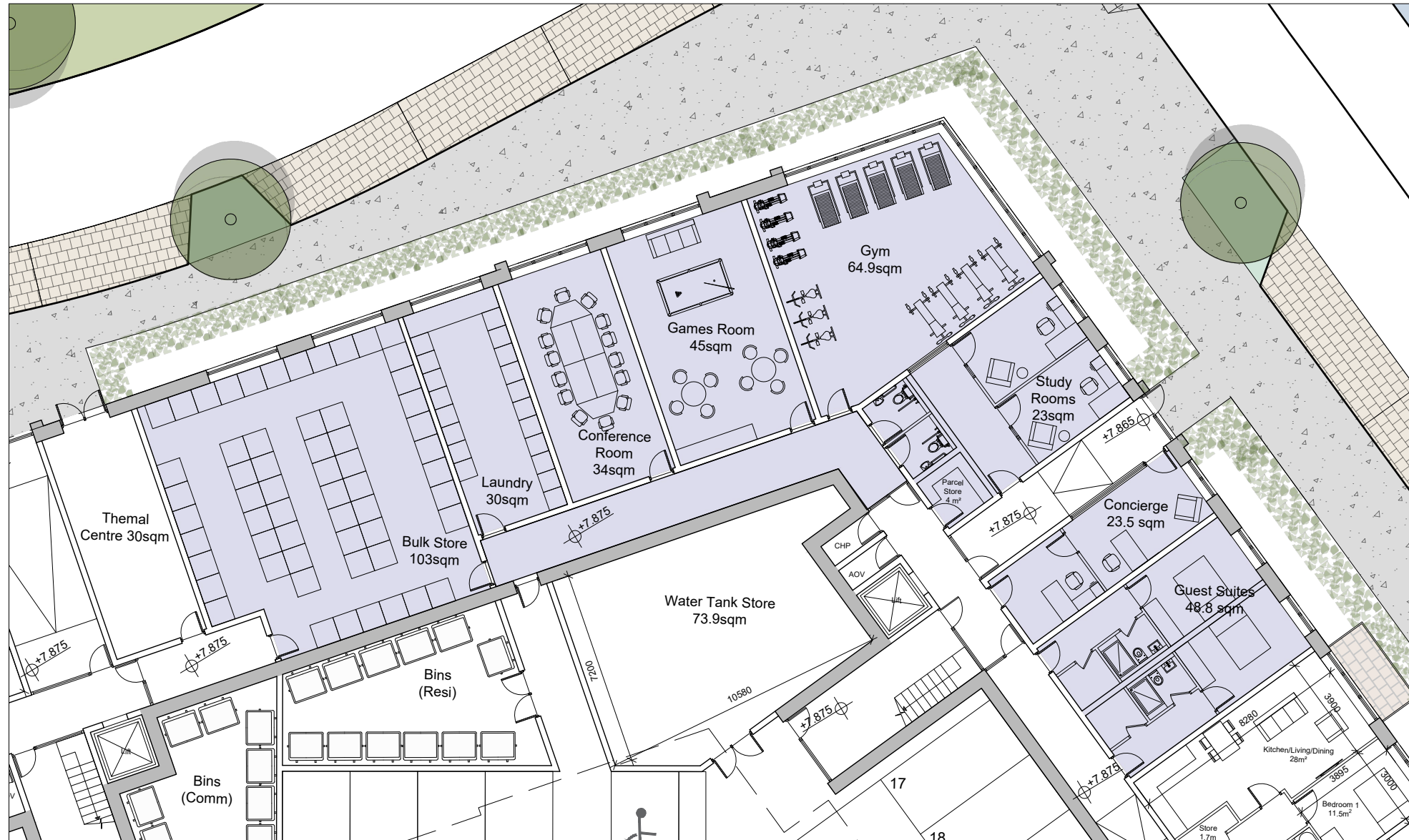
Clongriffin Block 13

Build to Rent - 187 Units

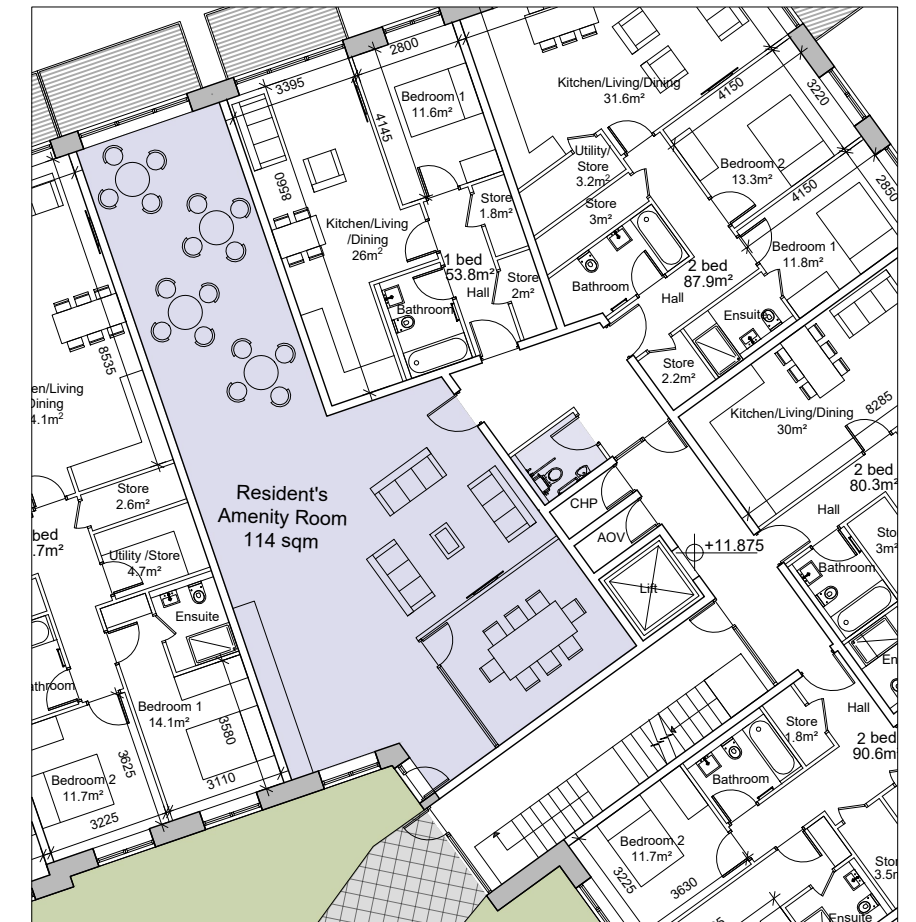
540.2 m² BTR amenity space

2.9 m² BTR amenity space/unit

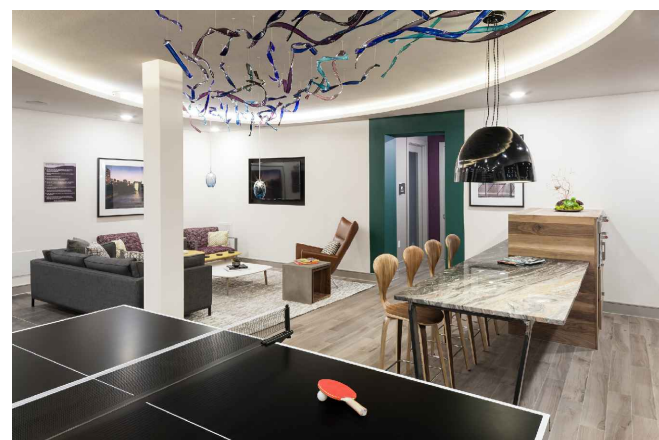
Residential Support Facilities	Sq.m.	Residential Services & Amenities	Sq.m.	Summary	Sq.m.
Laundry Room (GF)	30	Conference Room (GF)	34	Residential Support Facilities	210.5
Concierge (GF)	23.5	Games Room (GF)	45	Residential Services & Amenities	329.7
Parcel Store (GF)	4	Gym (GF)	64.9	Total	540.2
Bulk Store (GF)	103	Resident's Study Rooms (GF)	23		
Ancillary Circulation & WC's	50	Guest Suites (GF)	48.8		
Total	210.5	Resident's Amenity Room	114		
		Total	329.7		



Ground Floor Level



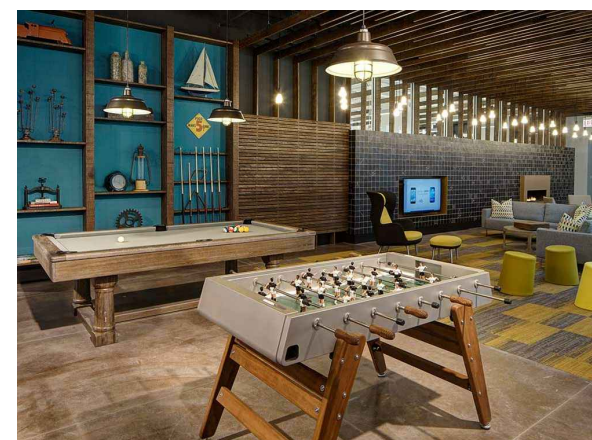
Podium Level



Residents' Amenity Room



Residents' Gym



Games Room



Residents' Study Room



Laundry Room

Clongriffin Block 14

Build to Rent - 191 Units, 745 m² BTR amenity space

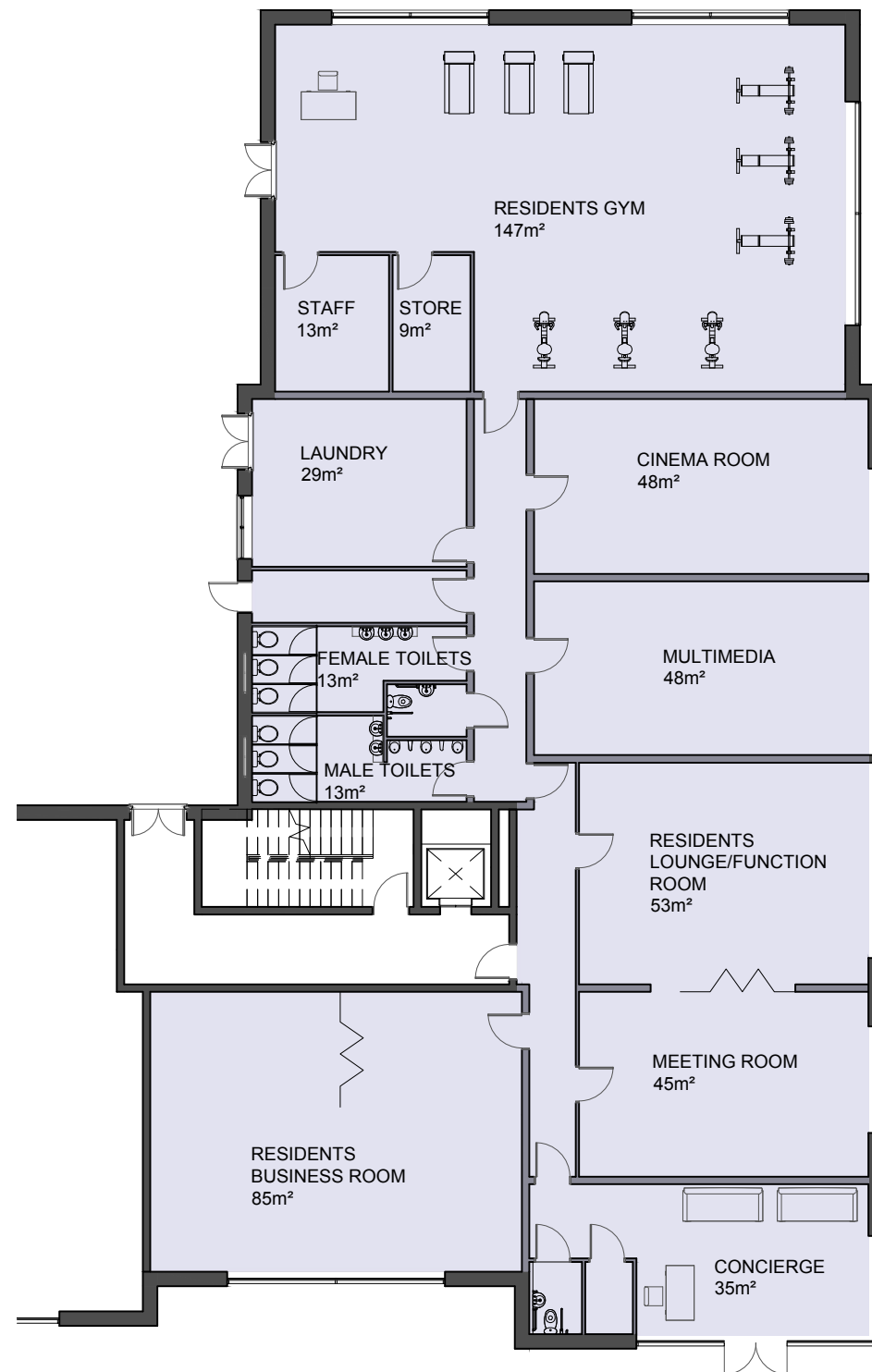
3.9 m² BTR amenity space/unit

Residential Services and Amenities

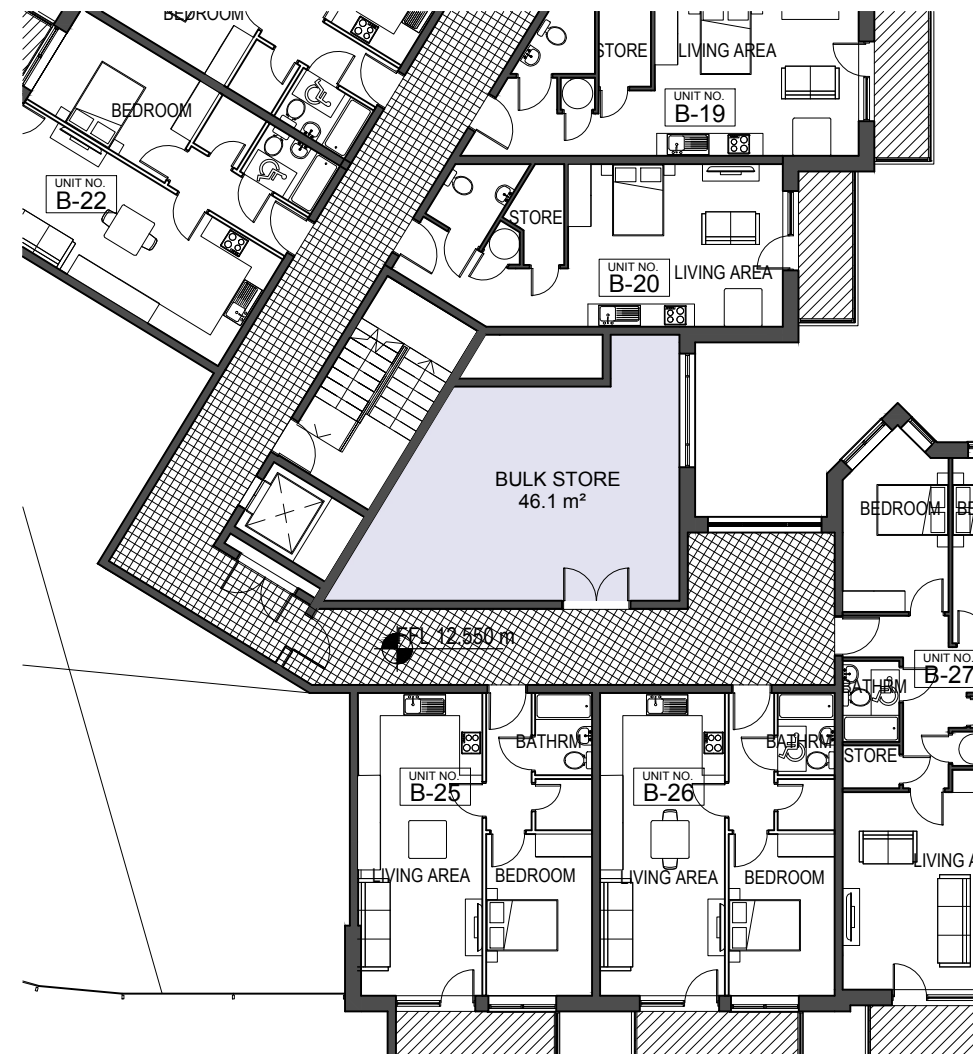
	Sq.m.
Residents Gym	123
Gym Staff	13
Gym Store	9
Female Toilets	13
Male Toilets	13
Cinema Room	48
Multimedia Room	48
Residents Lounge / Function Room	53
Meeting Room	45
Residents Business Room	85
Total	450

Residents support Facilities

	Sq.m.
Bulk Storage	231
Laundry	29
Concierge Office	35
Total	295



Ground Floor Level



1st - 5th Floor Level



Residents' Meeting Room



Residents Gym



Residents Cinema Room

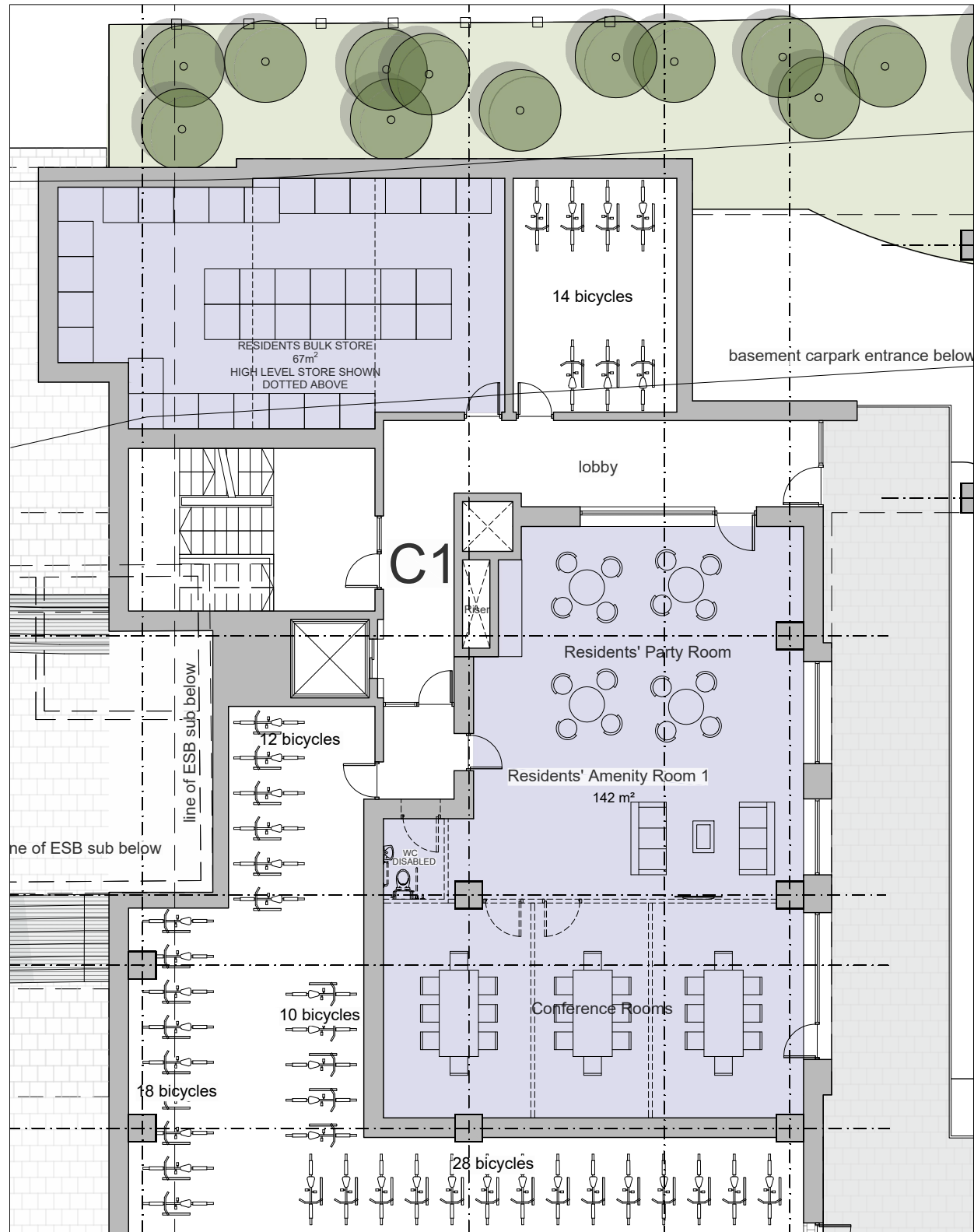
Clongriffin Block 17

Build to Rent - 210 Units

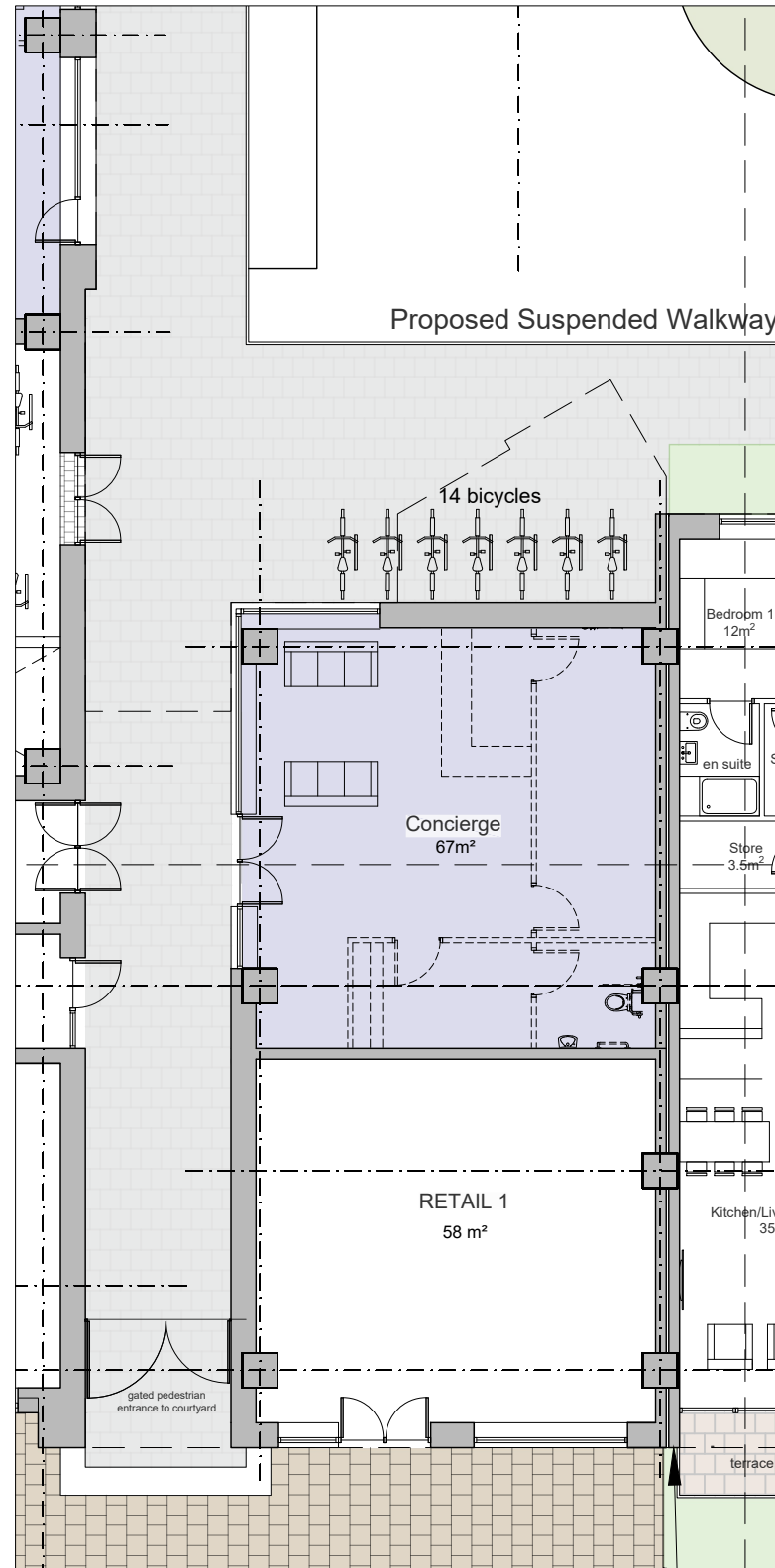
589.8m² BTR amenity space

2.8 m² BTR amenity space/unit

Residential Support Facilities	Sq.m.	Residential Services & Amenities	Sq.m.	Summary	Sq.m.
Concierge (GF)	67	Games Room (1F)	27	Residential Support Facilities	157.8
Resident's Bulk Store (GF)	67	Resident's Amenity Room 1 (GF)	142	Residential Services & Amenities	432
Laundry Room (7F)	23.8	Resident's Amenity Space (6F)	263	Total	589.8
Total	157.8	Total	432		



Ground Floor Level



Ground Floor Level



Concierge



Residents' Party Room



Residents' Meeting Room



Bulk Storage Lockers

Clongriffin Block 17

Build to Rent - 210 Units

589.8m² BTR amenity space

2.8 m² BTR amenity space/unit

Residential Support Facilities

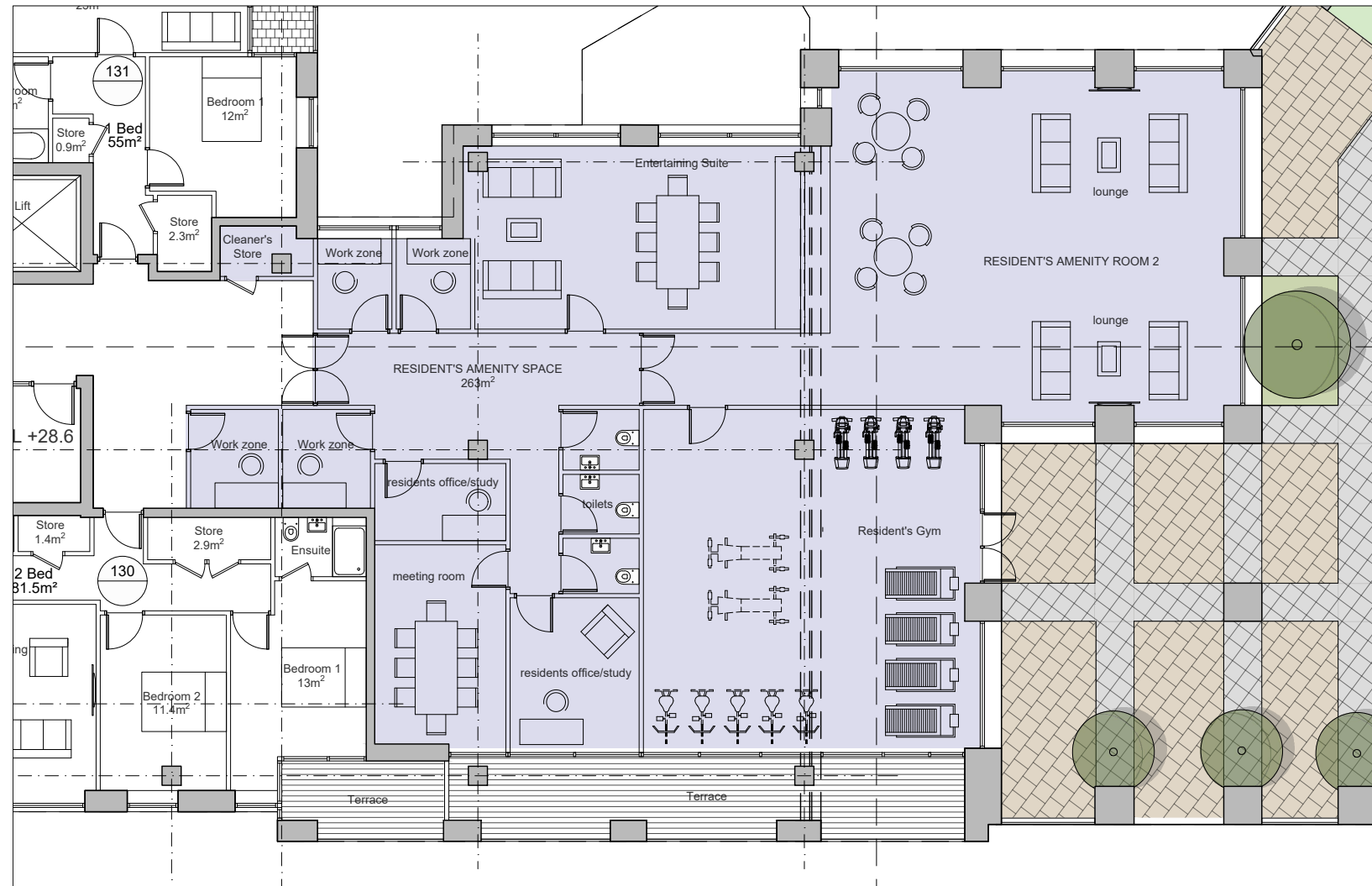
Concierge (GF)	67
Resident's Bulk Store (GF)	67
Laundry Room (7F)	23.8
Total	157.8

Residential Services & Amenities

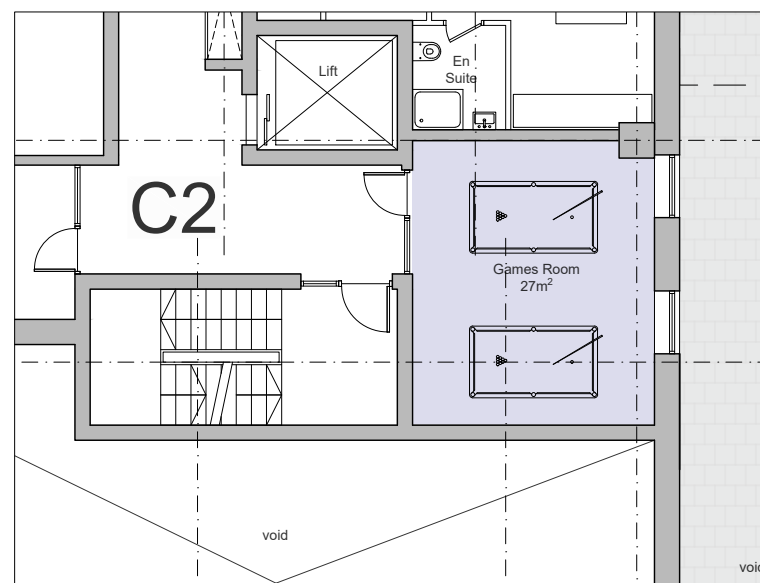
Games Room (1F)	27
Resident's Amenity Room 1 (GF)	142
Resident's Amenity Space (6F)	263
Total	432

Summary

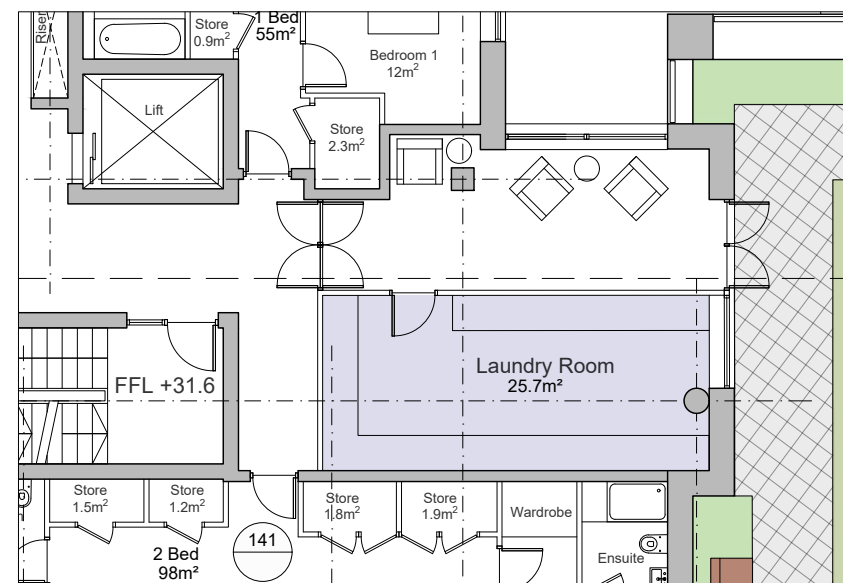
Residential Support Facilities	157.8
Residential Services & Amenities	432
Total	589.8



Sixth Floor Level



First Floor Level



Seventh Floor Level



Entertaining Suite



Residents' Study

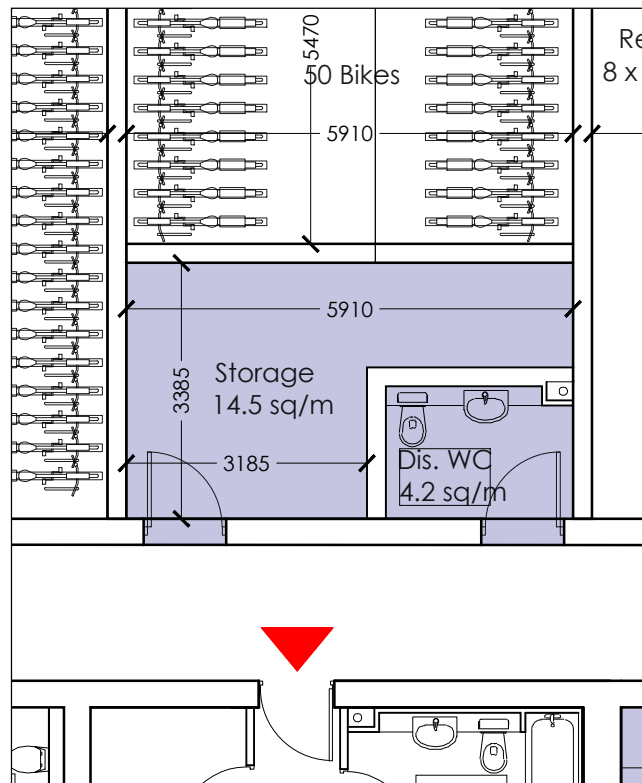


Residents' Work Zone

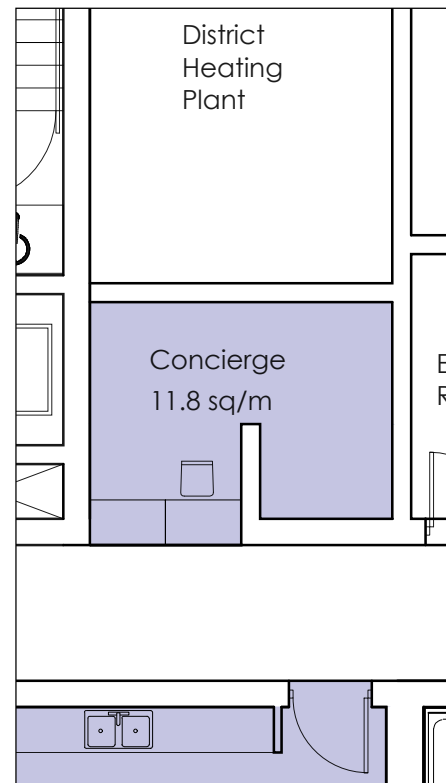


Residents' Gym

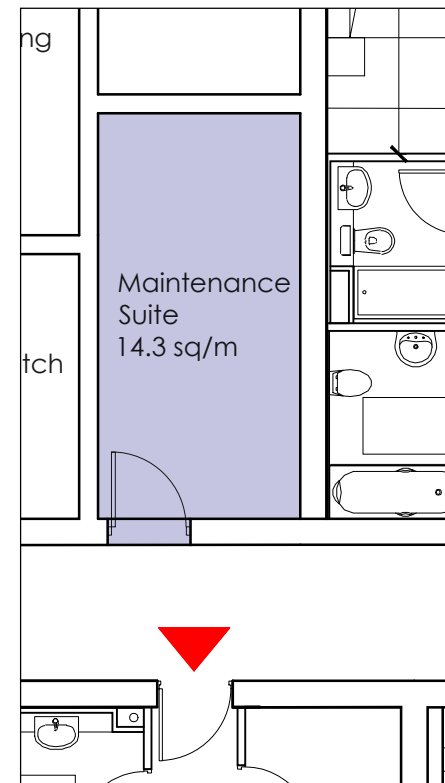
CLONGRIFFIN BLOCK 25 - 63 Units - 159.4 sq/m Amenity Space - 2.5 sq/m Amenity/Unit



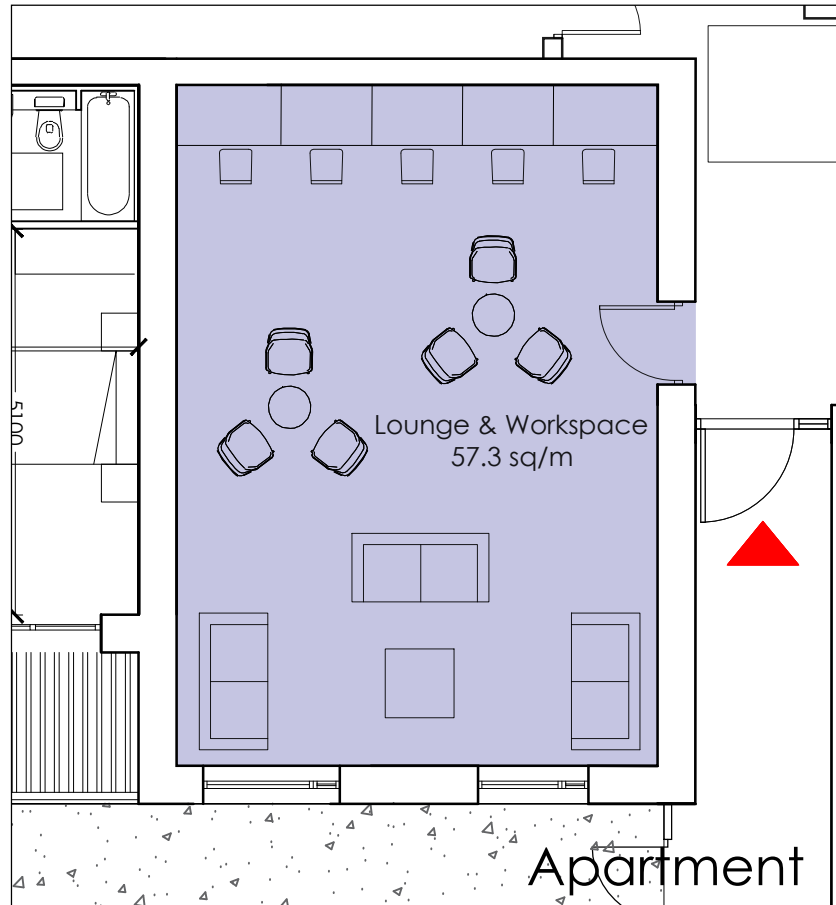
Storage, Disabled W.C.
Scale 1:100



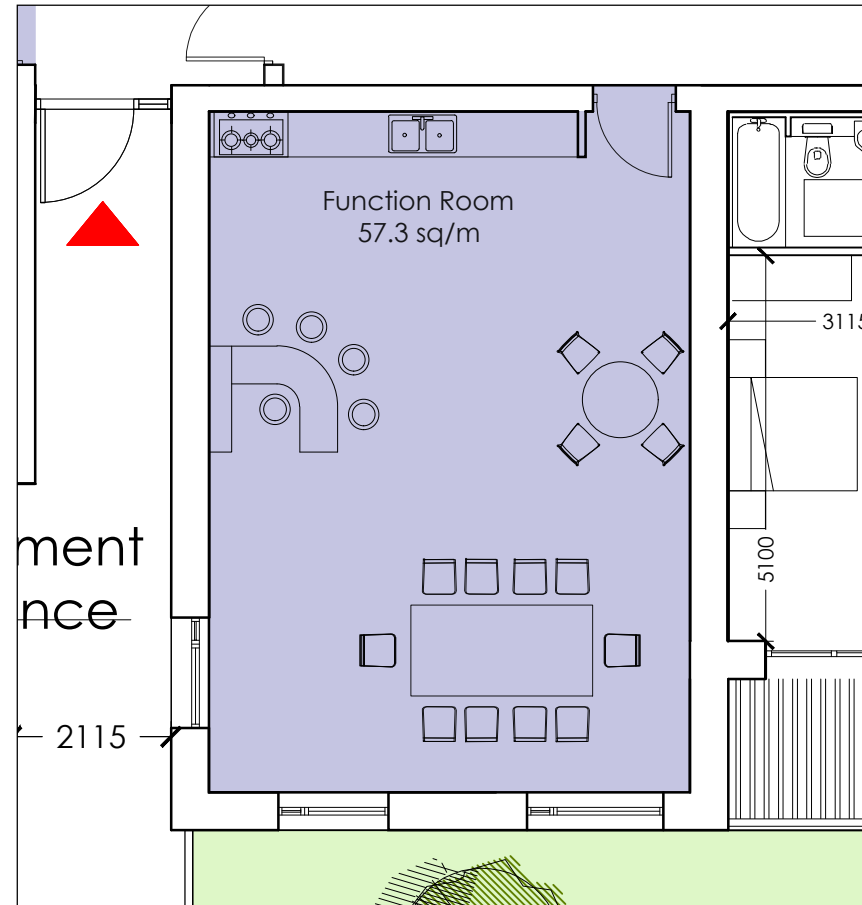
Concierge
Scale 1:100



Storage
Scale 1:100



Resident's Lounge & Workspace
Scale 1:100



Resident's Function Room
Scale 1:100

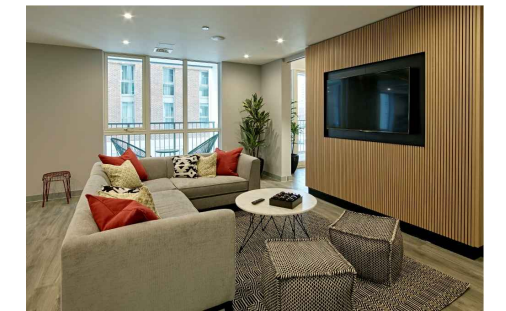
B25 AMENITY SPACE SUMMARY

Storage:	14.5 sq/m
Disabled W.C:	4.2 sq/m
Concierge:	11.8 sq/m
Maintenance Suite:	14.3 sq/m
Lounge & Workspace:	57.3 sq/m
Function Room:	57.3 sq/m

TOTAL AMENITY SPACE: 159.4 sq/m



Private Meeting Room



Resident's Lounge Area



Resident's Workspace



Private Dining Area

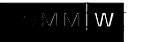


Reception Lounge



Concierge Desk

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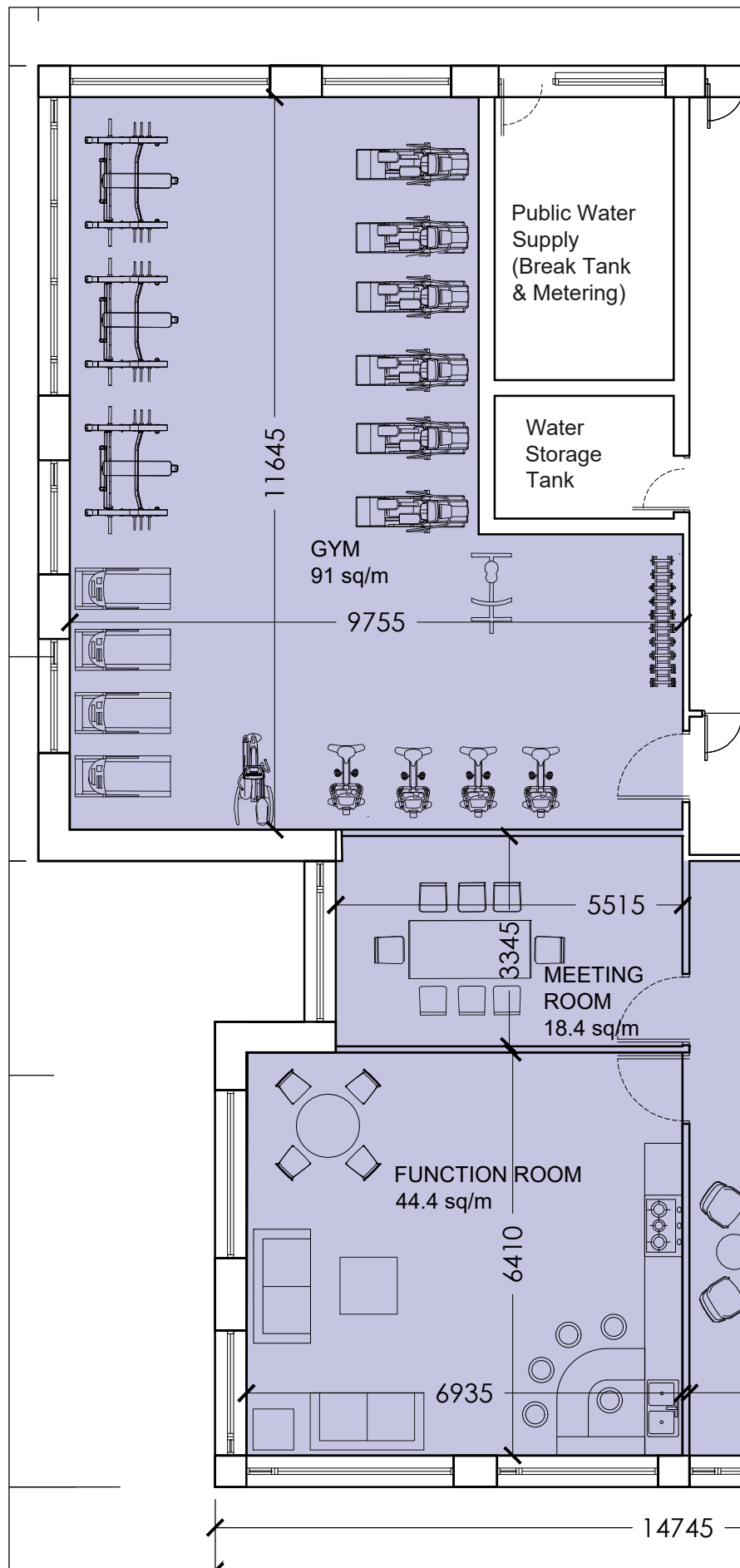


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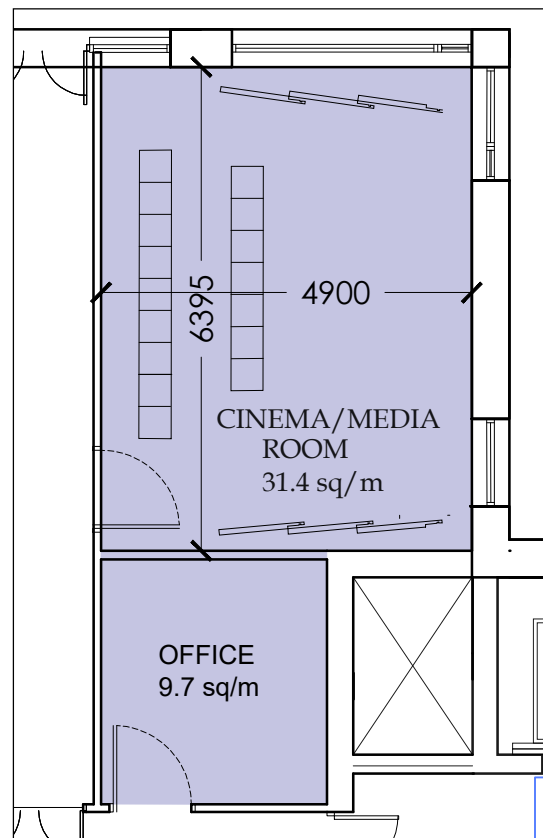
BLOCK 25 CLONGRIFFIN DUBLIN 15				AMENITY SPACE	
SCALE	DATE	DRAWN BY	CHECKED	REVISION/NO	DRAWING NO
1:200 @ A3	MAR 19	CG	PH	A	1825 - B25 - 700

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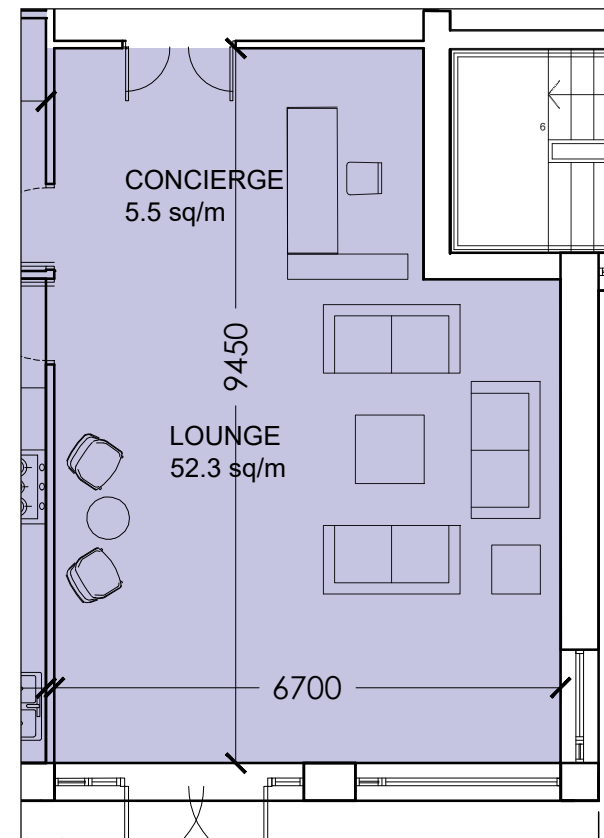
CLONGRIFFIN BLOCK 26 - 78 Units - 325.9 sq/m Amenity Space - 4.2 sq/m Amenity/Unit



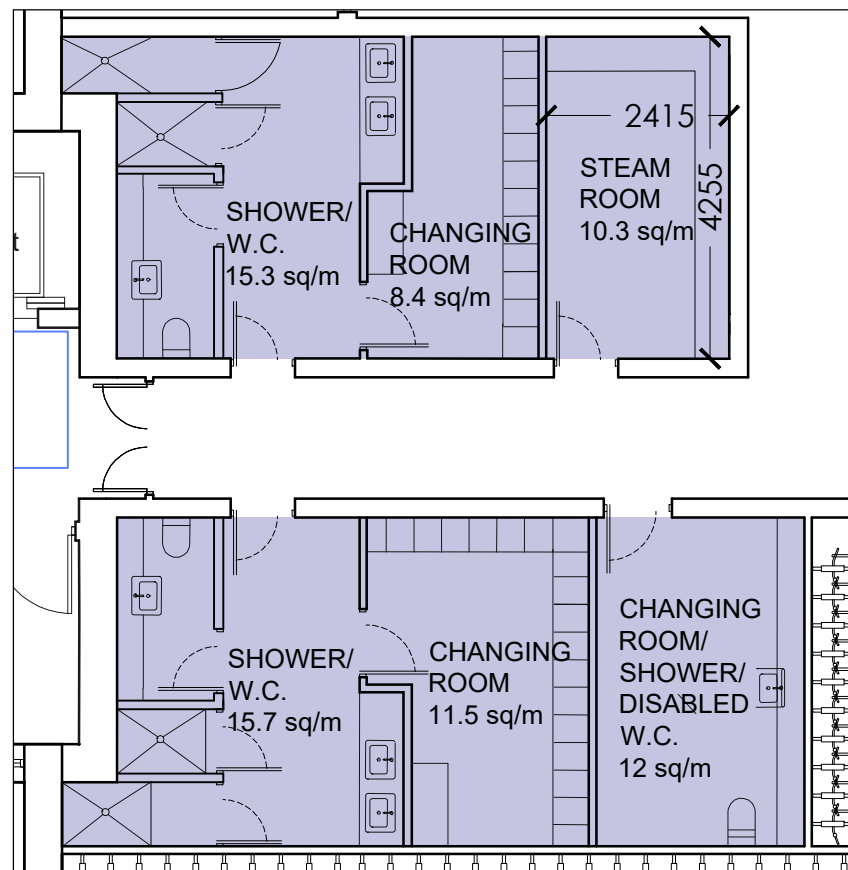
Gym, Meeting Room, Function Room
Scale 1:100



Cinema Room, Office
Scale 1:100



Lounge, Concierge
Scale 1:100



Changing Rooms, Showers, Steam Room
Scale 1:100

B26 AMENITY SPACE SUMMARY

Gym:	91 sq/m
Meeting Room:	18.4 sq/m
Function Room:	44.4 sq/m
Cinema/Media Room:	31.4 sq/m
Office:	9.7 sq/m
Reception:	5.5 sq/m
Lounge:	52.3 sq/m
Female Changing/Shower:	27.2 sq/m
Male Changing/Shower:	23.7 sq/m
Steam Room:	10.3 sq/m
Disabled W.C.:	12 sq/m

TOTAL AMENITY SPACE: 325.9 sq/m



Resident's Gym



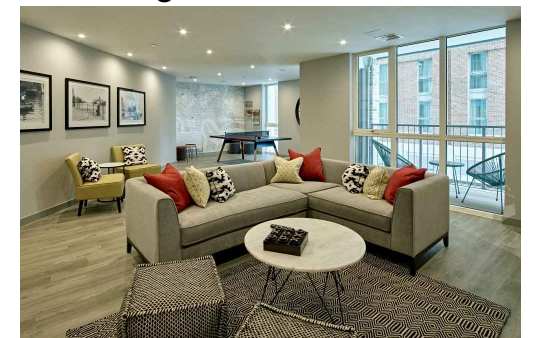
Resident's Workspace



Concierge Desk



Private Meeting Room



Resident's Lounge



Reception Lounge

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BLOCK 26 CLONGRIFFIN DUBLIN 13		AMENITY SPACE	
SCALE 1:100 @ A3	DATE MAR 19	DRAWN BY CG	REVISION NO. A
		DESIGNED BY PH	DRAWING NO. 1825 - B26 - 700

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CLONGRIFFIN BLOCK 27 - 57 Units - 175.1 sq/m Amenity Space - 3.1 sq/m Amenity/Unit



Resident's Lounge/Workspace, Function Room, Concierge & W.C
Scale 1:100

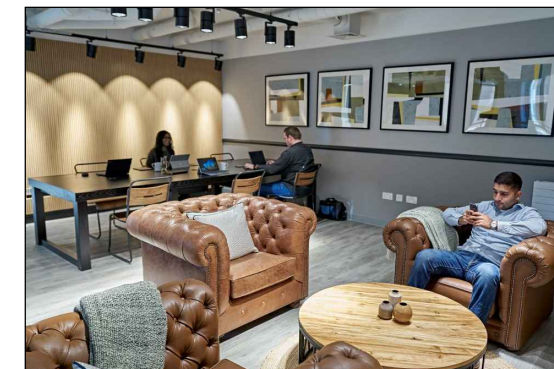
B27 AMENITY SPACE SUMMARY	
Residential Lounge/Workspace:	86.4 sq/m
Function Room:	73 sq/m
W.C:	6.1 sq/m
Concierge & Office:	9.6 sq/m
TOTAL AMENITY SPACE:	175.1 sq/m



Private Dining Area



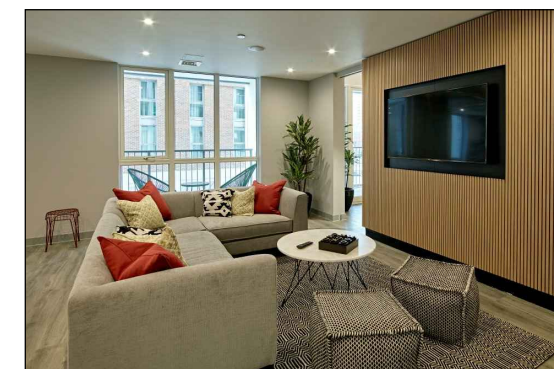
Private Meeting Room



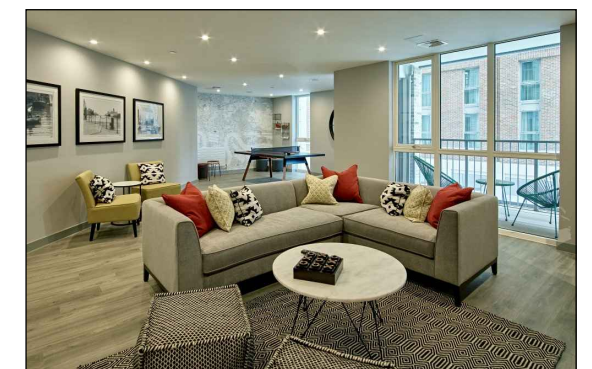
Resident's Workspace



Reception Lounge



Resident's Lounge Area



Resident's Lounge Area

WILSON ARCHITECTURE



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BLOCK 27 CLONGRIFFIN DUBLIN 13		AMENITY SPACE	
SCALE	DATE	DRAWN BY	CHECKED
1:100 @ A3	MAR 19	CG	PH
		REVISION NO.	DRAWING NO.
		A	1825 - B27 - 700

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Appendix 2 BTR Spreadsheet

Clongriffin - Proposed Build to Rent Units

Block	No. 1 bed units	No. 2 bed units	No. 3 bed units	No. Studio Units	Total No. of Units	Percent age Mix 1 bed units	Percent age Mix 2 bed units	Percent age Mix 3 bed units	Percent age Mix Studios	Total No. Dual Aspect Units	% of Dual Aspect Units	Total No. Single Aspect Units	Total No. Northern Facing Single Aspect Units	Total No. Units over 10% Gross Floor Area	Build to Rent(BTR)/ Build to Sell(BTS)/ Part V	Quantum of ancillary facilities for residents (Sq.m)	Quantum of Commercial development (sq.m)	Total Floor Area sq.m	No. Car Parking Spaces	No. of Bicycle Parking
Block 4	9	55	10	0	74	12%	74%	14%	0	47	64%	27	0	71	BTR	204.5	799	10,438	50	132
Block 6	123	147	0	0	270	46%	54%	0%	0	177	66%	93	0	270	BTR	794.7	418	25,470	184	572
Block 13	58	115	14	0	187	31%	61%	7%	0	110	59%	77	21	187	BTR	540.2	6,108	27,751	123	234
Block 14 (b)	63	77	6	45	191	33%	40%	3%	24%	88	46%	103	0	121	BTR	745	1,933	18,174	144	397
Block 17	90	111	9	0	210	43%	53%	4%	0	96	46%	114	14	175	BTR	589.8	430.5	22,789	75	225
Block 25	25	38	0	0	63	40%	60%	0%	0	39	62%	24	6	63	BTR	159.4	0	5,898	39	136
Block 26	50	28	0	0	78	64%	36%	0%	0	53	68%	25	7	78	BTR	325.9	0	7,396	52	190
Block 27	5	47	5	0	57	9%	82%	9%	0	30	53%	27	0	57	BTR	175.1	508	6,695	27	146
Total	423	618	44	45	1130	37%	55%	4%	3.98%	640	56.64%	490	48	1022		3534.6	10196.5	124,611	694	2032