



Shanganagh Residential Development Sustainable Neighbourhood & BTR Justification Report

Proposed Development at Shanganagh Castle


January 2020



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1.0 INTRODUCTION

This report has been prepared by HRA Planning on behalf of Dún Laoghaire-Rathdown County Council and the Land Development Agency in support of a residential development on lands situate in the townlands of Shanganagh, Shankill and Cork Little, Co. Dublin. This statement accompanies an application for approval to An Bord Pleanála made under Section 175 of the Planning & Development Act 2000 as amended for a residential development of 597 no. residential units comprising housing, apartment and Build to Rent (BTR) apartment units with ancillary commercial units.

A total of 51 no. two storey semi-detached and terraced houses are proposed with 8 no. apartment blocks. Eight apartment blocks comprise 506 no. build to rent units with 1 no. apartment block (Block F) providing 40 no. apartment units for sale. The residential units are intended to facilitate mixed community living such that:

- (a) 91 no. units (51 no. semi-detached and terraced units & 40 no. apartments comprising Block F) are affordable units intended for sale;
- (b) 200 no. BTR units including Blocks D, E & H are social housing units; and
- (c) the remaining 306 no. BTR units including Blocks A, B, C & G are cost rental units.

This report demonstrates the suitability of the site to accommodate BTR units having regard to its location in proximity to existing services and facilities and existing and improved public transport. It identifies the need for BTR having regard to existing social and economic considerations and identifies the policy supporting such provision. Finally, it examines the proposed development and the supporting facilities which will ensure the development of a sustainable and viable new community at Shanganagh.

2.0 SITE & CONTEXT

2.1 Site Description

Located to the south-east of Dún Laoghaire-Rathdown, the subject site is positioned between Shankill Village and the settlement of Bray. The site is located adjacent to the coastline of the Irish Sea and is on a relatively flat coastal plain, set against the backdrop of the Dublin and Wicklow Mountains. The site is situated within the grounds of Shanganagh Castle, adjacent to Shanganagh Park and Cemetery and the existing residential settlement of Castle Farm.

The subject site is located in an area identified for residential development under the Woodbrook – Shanganagh LAP (2017 – 2023) – hereafter referred to the LAP. The residential site is situated between two major public transport arteries; the existing DART railway line to the east, that will include a future station on the overall Woodbrook lands to the south (less than 1km from the site) and the Old Dublin Road (R119) and M11 motorway to the west. The lands in question are separated from the DART line by lands currently forming part of the adjoining Shanganagh Castle and Shanganagh Park. The overall Shanganagh lands measuring 9.68 hectares are located c. 1km south of Shankill Village centre and c 2.8km north of Bray town centre. The closest existing DART station is located at Shankill circa 2.1km to the north.

The established settlement of Shankill largely consists of a more traditional village settlement pattern with a central main street – containing more localised shops and facilities – surrounded by relatively low density housing estates constructed through the seventies and eighties. A number of newer medium to

high density residential developments, however, have been constructed in Shankill including for example – Olcovar, Aubrey and The Bridge.

2.2 Existing & Planned Uses

2.2.1 Subject Site

The lands proposed for residential development are located within the grounds of Shanganagh Castle. Part of the central area of the site is currently used by the Parks Department of Dún Laoghaire-Rathdown County Council as a maintenance depot with associated glasshouses. The remnants of allotments also dominate the site immediately north of the maintenance depot. A significant area of the site remains densely populated by mature planting with current restricted access to an existing pond. Whilst the site appears to be relatively level, a topographical survey confirms that from the highest point in the north-west (+29.50m) to the lowest in the south (+24.00m), there exists a general site-wide slope of ~1:50.

2.2.2 Adjoining Parkland

Shanganagh Park, adjoining the site, provides a number of significant amenities and facilities including 2 no. GAA pitches, 2 no. soccer pitches and training pitches, a playground, multi games area, cricket area and meadow land. There are proposals to upgrade the park from local to regional status with improved destination and public amenity facilities. At present, there are two GAA clubs, a soccer club, a cricket club, a baseball group and an athletics club using Shanganagh Park. The intention is to consolidate these multi users and to provide one large scale facility within Shanganagh Castle to manage all the sports teams. Attached to the Castle is an existing gymnasium building which is a ready-made facility. It requires renovation but it has the potential to cater for all the sports teams as well as additional community facilities.

The interface and connections between the proposed development and the emerging Park Masterplan were critically important thereby ensuring successful and permeable connectivity between the development and Shanganagh Park.

As stated in the LAP, *“Shanganagh Castle offers an excellent opportunity to provide publically accessible facilities that would not only serve the future population of the Plan Area, but also the wider area and indeed become an attractive facility to visit from further afield. The Castle has the potential to become a key focal point within Shanganagh Park and to provide for community functions subject to feasibility studies”.*

2.2.3 Planned Crematorium

A Part 8 consent was recently granted for a proposed crematorium within the grounds of Shanganagh Park, south of the subject site and north of the proposed development at Woodbrook. The development comprises a new crematorium building (reception, conference, office, kitchen, toilets etc.), two halls, a coffee and flower shop and associated access roads.

2.2.4 Planned DART Station

The planned DART Station at Woodbrook, in proximity to the subject site, is to be delivered by the NTA / TII is considered by all parties to be a reasonable objective of the LAP and is to be delivered as soon as possible. It is understood from the Woodbrook planning application, made on neighbouring land to

the south, that the NTA have already commenced the design of the Station and that a planning application will be made in Q1 2020.

It is noted that the neighbouring Woodbrook planning application has provided for an avenue through its development to facilitate connection to the proposed DART Station. It has also provided a temporary car park adjacent to the planned station.

The proposed development at Shanganagh Castle provides for an adequately illuminated, shared cycle and pedestrian greenway through Shanganagh Park and the Crematorium to facilitates direct connectivity with the planned DART Station.

2.3 Existing Social Services & Infrastructure

As can be expected from the site's location in proximity to the town centre of Shankill, and its designation as a 'future development area' in the Shanganagh Woodbrook Local Area Plan, the area around the subject site is served by a multitude of social services facilities. These existing facilities and services not only serve existing populations but are also intended to serve future population growth in the area. The location of such services and facilities are detailed in maps appended to this report.

2.3.1 Recreation & Amenity

The subject site is exceptionally well served by recreational facilities primarily due to its location adjoining Shanganagh Park and its associated sports facilities which include Cuala GAA grounds, Shankill F.C. soccer pitch and Dublin Black Sox baseball grounds. Also, within close proximity of the park is a Bowling Green, Shankill Tennis Club, Woodbrook Golf Club and a public playground. Facilities are primarily located to the south and east of the site most of which are within a 10 minute walking distance of the site.

2.3.2 Health Facilities

There are six health facilities within walking distance of the site (excluding dentists, pharmacies and physiotherapists). Such facilities include a primary care centre which is under construction on the site of the old health centre. Planning has also been secured for a medical centre as part of the Lidl shopping centre re-development proposal on the Dublin Road. Other facilities include Beechfield Manor Nursing Home which has a 69-bedroom capacity, Rathmichael Medical Centre, St. Joseph's Hospital (now dedicated to dementia care) and 2 no. GP surgeries.

2.3.3 Childcare Facilities

According to Tusla, An Pobail and Dún Laoghaire County Childcare Committee there are currently 19 no. registered childcare facilities operating within the three Shankill electoral divisions, 4 no. of which are located within the Shanganagh ED. The majority of facilities contacted confirmed that they are operating at capacity. However, it is understood that two new facilities are due to open soon with planning secured for one at Lidl (Shankill) Shopping Centre and another due to open on Quinn's Road. The majority of facilities are private enterprises with 2 no. identified as community / voluntary organisations while 2 no. are specialist facilities for kids with autism.

2.3.3 Education Provision

There are 3 no. primary schools and 1 no. secondary school within a 15 - 20-minute walk time of the site. Provisional figures for 2018/19 show 1,040 children enrolled in the three primary schools of

Rathmichael, St. Anne's Mixed and Scoil Mhuire while 388 no. pupils are enrolled in Woodbrook College Secondary School. A site has been identified for the provision of a new eight classroom primary school within the Woodbrook land. It is understood that the school is to be delivered by 2021¹.

In the wider area there are 5 no. additional primary schools, 3 no. of which are north of the site at Loughlinstown with 2 no. located to the south in the Bray northern environs, a short drive from the proposed development. There is a selection of secondary schools in the wider area with 10 no. located within 5km of the site.

2.3.4 Community Services Provision

Community centres and services are primarily located north of the subject site with the exception of Cois Cairn Community Centre which is located to the south. The Post Office, Credit Union, Garda Station, Library and Train Station can be reached within a 15-minute walk of the site. Childcare services are located in four of the five community centres with 10 no. community facilities identified in total. There are also a number of community facilities in the vicinity of the site and located in Shanganagh Park including a significant bring centre intended to serve the surrounding community.

2.3.5 Retail & Commercial Services

Shankill town centre provides for localised shops and facilities including Spar and Tesco Express. There is also a Neighbourhood Centre near the train station with a Centra store located in a residential area adjacent to Shanganagh Park House and Scoil Mhuire primary school. A new neighbourhood centre is planned at Woodbrook and has been identified in an overall masterplan for the site.

South of the site on the Dublin Road there are 2 no. existing neighbourhood shopping centres with Lidl and Supervalu as anchor tenants. Further, planning permission has been approved for the redevelopment of Shankill Shopping Centre with Lidl due to become the anchor tenant in a mixed used development which is to include a creche and a medical centre.

Higher order retailing is provided in Bray, located south of the subject site, and designated in the Wicklow County Development Plan 2016-2022 as a Level 1 – Metropolitan Consolidation Town. The existing DART line also provides the area with good links to Dún Laoghaire Council which is identified as a Major Town Centre in the County Development Plan. As with Bray, Dún Laoghaire provides a higher-order retail offering together with employment opportunities.

2.3.6 Transport Services

The site sits within a major multi-modal transport corridor of local, regional and national importance. The existing transport infrastructure includes the South East Rail line (DART), the M11/N11 National Road Corridor and the R119 (Dublin Road). The area is served by good public transport links in the form of both bus and DART. The South East Rail Line (Suburban Rail) runs in proximity to the site in a north-south direction along the coast. This rail line accommodates the DART connecting Shankill to Dublin city.

The R119 (Dublin Road) fronts the site and runs in a north-south direction providing direct access to Shankill, Bray and the M11 via the Wilford Interchange. Both the R119 and the M11 provide access to the N11 serving Cherrywood and Sandyford as major employment centres, as well as the city centre.

¹ Sourced from Department of Education website – announcement made in April 2018

The M11 links Dublin with the south-east of the country and provides access to the M50, which in turn offers easy access to all major national routes. The R119 (Dublin Road) provides a route northwards towards Dún Laoghaire as a Major Town Centre and also the eastern fringes of the County.

In terms of sustainable transport modes, the existing road network in the vicinity of the site serves a number of Dublin Bus Routes which connects the subject site to the city centre and also Dún Laoghaire (Route Nos. 145, 45A 45B, 84, 84A, 155). The R119 as a part of the Quality Bus Network (QBN) also provides for cycle lanes and footpaths on both side of the road in the vicinity of the proposed development. The NTA is currently developing proposals to provide a Core Bus Corridor along Dublin Road from Bray to Dublin City Centre to further enhance bus travel.

There are existing bicycle lanes running either side along Dublin Road to the front of the development that facilitates the use of this sustainable form transport. There are also cycle tracks from the site connecting to tracks in Shangnagh Park and onwards to the proposed Woodbrook Dart Station.

3.0 POLICY SUPPORT FOR BTR

3.1 Rebuilding Ireland, An Action Plan for Housing & Homelessness

Government policy since the publication of the 'Rebuilding Ireland, An Action Plan for Housing and Homelessness' in 2016, has sought to provide for a more vibrant and responsive private rented sector. A core objective of the Rebuilding Ireland document looks at "*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'.

3.2 Sustainable Urban Housing: Design Standards for New Apartments

The 'Sustainable Urban Housing: Design Standards for New Apartments (2018)' [2018 Apartment Guidelines] 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*".

The Guidelines recognise that BTR has the potential to accelerate the delivery of new housing at a significantly greater scale than at present. The Guidelines reiterate the potential for accelerated housing construction through BTR can make a significant contribution to the required increase in housing supply nationally, identified by Rebuilding Ireland, and the scale of increased urban housing provision envisaged by the National Planning Framework.

The Guidelines promote BTR development and urge their consideration by planning authorities through specific BTR planning and design policies and standards.

3.3 Dún Laoghaire-Rathdown County Development Plan 2016 - 2022

In the Dún Laoghaire-Rathdown County Development Plan 2016 - 2022 (CDP) Woodbrook is identified as a future development area in the core strategy settlement structure. The CDP states that there is potential for an additional 2,300 residential units in Woodbrook – Shanganagh having regard to the extent of land that is zoned.

The CDP proposes a neighbourhood framework based on the provision of a high-density urban form that maximises the use of existing and proposed transport infrastructure and aims to reduce the need to travel. It states that two distinct urban nodes are proposed - one at Woodbrook, which includes a new neighbourhood centre, and the second at Shanganagh Castle which will essentially be a reinforcement of the existing urban form immediately to the south of Shankill village. It confirms that the lands, when fully developed, will accommodate an additional 5,000 to 6,000 persons in approximately 2,000 to 2,300 units. Objective 54 of the CDP seeks to implement and develop the lands at Woodbrook and Shanganagh in accordance with the Woodbrook/Shanganagh Local Area Plan.

The CDP recognises that the Council must continue to utilise all policy avenues available to it to ensure the optimum delivery of residential units over the duration of this Plan from both the public and private sectors. In seeking to secure this objective the Development Plan response in relation to residential development will focus on three interrelated strands, namely: increasing the supply of housing; ensuring an appropriate mix, type and range of housing; and promoting the development of balanced sustainable communities.

Policy RES7 of the CDP states that, *“it is Council policy to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided within the County in accordance with the provisions of the Interim Housing Strategy”*.

3.4 Woodbrook – Shanganagh Local Area Plan 2017 - 2023

The Woodbrook – Shanganagh Local Area Plan (LAP) identifies two discrete development parcels including lands at Shanganagh Castle and Woodbrook – incorporated within a wider environ. The LAP area is identified within the County Development Plan Core Strategy as a ‘Primary Growth Node’ and also as a ‘Major Urban Housing Delivery Site’ by the Department of Housing Planning and Local Government (DHPLG). It is an objective of the Council to unlock the potential and accelerate the delivery of housing on Woodbrook-Shanganagh, working in collaboration with all relevant stakeholders (Objective H1); to promote sustainable higher densities and quality innovative housing designs (Objective H2); and to promote high quality homes and quality residential choices for a range of household needs (Objective H3).

Objective H11 of the LAP seeks, *“to ensure that proper community and neighbourhood facilities are provided in conjunction with, and as an integral component of, major new residential developments in accordance with the concept of sustainable urban villages and the objectives and principles of ‘Sustainable Residential Development in Urban Areas’ and the accompanying ‘Urban Design Manual – A Best Practice Guide’”*.

The LAP recognises that a successful mix of unit design and typologies, as well as adaptable or whole life-cycle homes, need to be provided to create inclusive and socially balanced residential communities. It recognises that emerging housing models create opportunities for intermixing of tenure throughout a residential development.

The LAP states that the Council will proactively encourage quality build-to-rent schemes having regard to the reality that nationally circa 30% of households rent their home, whilst in urban areas such as Dublin and Cork this figure rises to circa 40-50%. This approach also takes account of the specific role that build-to-rent projects can play in addressing shortages of rental accommodation in higher demand areas. In this regard, Objective H7 of the LAP seeks to promote Build to Rent projects as a viable attractive type of household tenure.

The LAP recognises that Guidelines also provide for 'studio' type apartments and stipulate that it is a specific planning policy requirement that planning authorities facilitate the provision of studio apartment type developments in certain specific circumstances, such as part of new 'build to let' managed accommodation above a certain threshold, i.e. 50 units or more. It also acknowledges that the 2015 Guidelines for New Apartments states that it is a planning policy requirement that mix ranges that generally apply to housing should not apply to student accommodation, certain housing projects or managed build-to-rent projects.

4.0 SOCIAL & ECONOMIC JUSTIFICATION FOR BTR

4.1 Population Growth

According to the CSO Census of Population 2016 (CSO) 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. According to a recent Linesight report (*'The Build-to-Rent Sector in Ireland, Analysis and perspectives from key industry stakeholders'*, November 2018), the BTR model responds to increased demand for secure and longer-term rental properties among the 25-44 age cohorts.

The Shankill Shanganagh Electoral Division (ED) in which the subject site is located had a population of 5,488 no. persons in 2016. This represents a population percentage change of 2.8 per cent or an actual population increase of 154 no. persons from the 2011 Census figures, well below the national average of 3.8 per cent. Whilst the wider Dún Laoghaire-Rathdown area had above average population growth (5%) between 2011 and 2016 the three electoral divisions of Shankill had below average growth rates.

The low population growth, however, has to be considered in the context of a growth in the average household size in the electoral division of Shankill Shanganagh. This growth in household size is higher than the state average, at 2.92 persons in 2016.

The low population growth and increase in household size is likely attributable to the lack of available housing in the area and in particular the low delivery of new build units having regard to historical infrastructural deficiencies.

The delivery of BTR units can address some of this pent-up demand. 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.

4.2 Employment Growth

The ESRI Quarterly Economic Commentary for Spring 2019 states that as the Irish economy is expected to grow over the next two years, further improvements in the labour market are expected. It further indicates that household consumption is expected to continue growing over the next two years.

Within the settlement of Shankill (comprising 3 ED's), of the 11,453 people that are eligible for work almost 55 per cent are recorded as being in employment. Within the ED of Shanganagh, employment levels are high (59%) when compared to the State (53%) and the administrative area of Dún Laoghaire-Rathdown (54%)

The subject lands are ideally located within close proximity to significant employment areas, all accessible by public transport. These employment areas and centres include:

- Bray Town Centre;
- Dublin City Centre (direct DART access from Shankill and future new DART from Woodbrook);
- Sandyford Industrial Estate (11km)
- Stillorgan Industrial Park
- Dundrum Town Centre.

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 and N11 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.

4.3 Housing Stock & Structure

Of the 1,904 households in Shanganagh ED, 91% comprise a house / bungalow with only 9% comprising a flat / apartment². Most of these units were constructed between 1981 and 1990 with only 215 no. units constructed since 2001. Some 79% of the units are owner occupier with 15% rented from a private landlord and almost 4% rented from the local authority or a voluntary housing authority. It can be concluded that the predominant unit and tenure type in the area is that of an owner-occupied house.

The rate of growth in apartment living has 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 the Daft.ie Q3 2019 report there were 9,185 new dwelling completions in the first half of 2019. This represents an increase of almost 17% on the same period last year. The number of apartments increased significantly by 55.6%.

These statistics are also reflected at a local scale. The first half of 2019 has seen a continued growth in the number residential planning permissions granted in Dún Laoghaire-Rathdown. Again, this has been driven by apartments, which has seen a 334% increase in units obtaining planning permission compared to H1 2018. Altogether, 1,656 units of this type were granted in H1 2019.

² Census of Population 2016

The delivery of apartment units in Dublin is increasing in response to market demand and planning policy. Apartment typologies are becoming the norm and the delivery of 506 no. BTR units as part of the proposed development will further enhance supply on the area. According to Daft.ie, the last rental report, published in August, highlighted that approximately 25,000 new purpose-built rental homes are on the way in Dublin and Cork over the coming five years. These are badly needed in both cities but only scratch the surface of true underlying need - which of course is not confined just to Dublin and Cork.

4.4 Rental Market

According to the Linesight Report 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. 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.

According to the RTB, the average monthly rent in Q2 2019 in Shankill in Dublin was €1,598. This compares to €1,659 for Dublin as a whole. In terms of the different property types, the average rent paid per month for apartments was €1,389 in Shankill, in comparison to €1,594 for Dublin overall.

Rents in Dublin have continued to rise at a sustained pace, although according to the most recent Daft.ie Rental Report Q3 2019, the average rent is beginning to level off. According to the RTB rental index, rents in Dublin grew 7.1% annually to Q2 2019. Overall, rents in Dublin were 32% higher than their pre-crisis peak.

Now more than ever there is a need for affordable housing and rental units. The proposed development at Shanganagh seeks to provide for more affordable units and increase the supply of rental apartment units in an otherwise dominant owner-occupied housing market.

5.0 PROPOSED DEVELOPMENT

5.1 Development Proposal

The proposed development has been heavily influenced by the Site Framework Strategy set out in Section 4.3.2 of the LAP. The LAP sets out a number of key site objectives which has influenced the overall approach to development on the site.

The proposed development provides for 597 no. units and will provide for a mixed-tenure development, facilitating units for sale, social housing and rent as detailed in Table 5.1 across a range of unit sizes, detailed in Table 5.2. 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.

Unit Format	Unit Type	Unit Location	No. of Units
Affordable Sale	Terraced House		51
Affordable Sale	Apartment	Block F	40
BTR Social Units	Apartment	Blocks D, E & H	200
BTR Cost Rental Units	Apartment	Block A, B, C, G	306

Table 5.1 Mixed Tenure Development Proposal

Unit Size	Detached	Semi Detached	Terraced	Apartments	% Mix of Overall Development
Studio				29	4.8%
1 bed				165	27.6%
2 bed	1	14	15	281	52%
3 bed			21	69	15%
4 bed				2	0.3%
Total	1	14	36	546	100%

Table 5.2 Unit Size and Number Across Entire Development

5.2 Density

The number of units proposed within the overall development seeks to accommodate higher density development on site in accordance with national, regional and local policy. The proposed development results in a net residential density of 85 no. units per hectare based on a net site area of 7.03 hectares.

The provision of the DART Station and Bus Connects (along the Old Dublin Road – R119) will provide substantially increased public transport connectivity to the site. The detail of the transportation policy context is set out in the Traffic and Transport Assessment and Travel Plan, both prepared by Punch Consulting Engineers. The following national planning policy context sets out the aspirations to generally increase densities on sites which benefit from higher levels of public transport.

(i) National Planning Framework – Ireland 2040

The National Planning Framework (NPF) sets out a number of National Policy Objectives (NPO) that seek to ensure that the overriding intent of the NPF is delivered, including: -

- National Policy Objective 2a - *“A target of half 50% of future population and employment growth will be focused in the existing five Cities and their suburbs”.*
- National Policy Objective 3b - *“Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford within their existing built-up footprints”.*
- National Policy Objective 11 - *“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth”.*

(ii) Regional Spatial & Economic Strategy – Eastern & Midlands Regional Strategy

The Regional Spatial Economic Strategy (RSES) identifies Shanganagh as one of a number of strategic sites, located along the strategic North – South Corridor that will benefit from increased capacity on the DART Line planned by 2027.

It states that, *“The DART Expansion Programme, to be delivered by 2027 will increase capacity on the northern commuter line and support ongoing large-scale urban expansion of the North Fringe lands and Donabate. On the south eastern commuter line capacity is unlocked by a new station at Woodbrook - Shanganagh, with the consolidation and westward expansion of Bray to Fassaroe and Old Conna linked to improved public transport connections.”*

(iii) Sustainable Residential Development Guidelines (2009)

Section 5.8 of the Guidelines recommends that: - *“...in general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations, bus stops, and decreasing with distance away from such nodes”.*

(iv) Sustainable Urban Housing: Design Standards for New Apartments (2018)

Having regard for the location of the subject site, it is considered that under the provision of the New Apartment Guidelines it is most appropriately defined as an ‘Intermediate Urban Location’. The locational attributes of the site as set out in the Traffic and Transport Assessment, prepared by Punch Consulting Engineers which have a bearing on car parking quantum.

Residential density greater than (>) 45 dwellings per hectare (net) are identified as being appropriate for ‘Intermediate Urban Locations’ where the site is:

- Within 1,000m (10 mins. walking) distance of a principal town or suburban centre or employment location [N/A - Bray Village is located c.2.8km to the south].
- Within 1,500m (15 mins walking) distance of high capacity urban public transport stops (commuter rail/light rail) [Potential for improvements to rail/light rail station located – proposed DART Station].
- Within 1,000m (10 mins. walking) distance of existing or planned high frequency urban bus service [Potential for improvements to bus commuting service under Bus Connects].
- Within 500m (5 mins. walking) distance of reasonably frequent urban bus service (min 15 minute peak hour frequency) [Potential for improvements to bus commuting service under Bus Connects].

(v) Dún Laoghaire-Rathdown County Council Development Plan 2016 – 2023

The Development Plan sets out that where a site is located within c. 1 kilometre pedestrian catchment of a rail station, Luas line, BRT, Priority 1 Quality Bus Corridor and / or 500 metres of a Bus Priority Route, and/or 1 kilometre of a Town or District Centre, higher densities at a minimum of 50 units per Ha will be encouraged.

(vi) Woodbrook – Shanganagh Local Area Plan 2017 – 2023 (LAP)

The Local Area Plan sets out that average minimum net density of 60no. units per hectare shall apply to the lands at Shanganagh.

(vii) Summation

The density proposed, having regard for the future provision of high frequency public transport options in proximity to the site, will ensure that sufficient critical mass is developed on serviceable and highly accessible land in accordance with the objectives of current national planning policy.

5.3 BTR Requirements

Section 5 of the Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities 2018 (“2018 Apartment Guidelines”) 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 have been designed in accordance with these guidelines including the following characteristics:

- The proposed BTR social units will be owned and managed by Dún Laoghaire-Rathdown County Council or an approved housing body 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 need of social housing.
- The proposed BTR cost rental 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 Shankill 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 507 BTR units will make a significant contribution to the required increase in housing supply nationally.

The Guidelines state that the promotion of BTR development by planning authorities is 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 2018 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 SPPR 8.

5.3.1 SPPR7

The requirements of SPPR 7 as extracted from the 2018 Apartment Guidelines are detailed in Figure 5.1.

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 fifteen years and that no individual units will be sold or rented separately within that period. Please refer to the cover letter from Dún Laoghaire-Rathdown County Council which accompanies the application and confirms same.

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.

Figure 5.1 Extract of SPPR7 from the 2018 Apartment Guidelines

BTR is a product tailored around lifestyle, with a strong emphasis on brand and the amenities that the building provides. Resident services and facilities are a key component within a BTR scheme

In accordance with SPPR 7(b) 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 detailed in Table 5.3. Further, provision is made for a creche capable of accommodating 107 no. children.

Resident Support Facilities	Resident Services & Amenities
Concierge Facilities	Gym
Parcel / Store Room	Lounge / Cinema Room
Central Energy Centre	2 no. Communal Lounges
Bike Storage Areas	Gallery / community room
Waste Management Areas	Local Shop
	Local Cafe
	Business Pods
	Function Room
	Co-working Office Unit
	Creche
	Playground
	2 no. Kickabout areas

Table 5.3 Resident Facilities, Services & Amenities within Overall Development

A breakdown of the units proposed for Build to Rent and their associated facilities is set out in Table 5.4. The creche, local shop and café are not included within the stated floor areas.

No. of Units	Total Quantum BTR Facilities (Sq.m.)	Sqm per BTR unit	Type of Facilities
506 no. BTR Units	Support Facilities Total 1,220sqm	2.41sqm	Concierge Parcel / Store Room Waste Management / Bin Store Bike Storage Areas
506 no. BTR Units	Services & Amenities Total 1,134.7sqm	2.24sqm	Gym Lounge / Cinema Room Gallery / Community Room 2 no. Communal Lounges Business Pods Function Room Co – Working Office Unit

Table 5.4 Breakdown of BTR Units & Specific BTR Associated Facilities

The proposed BTR facilities are dispersed throughout a number of different blocks of development, the intention being that the facilities will serve the entire development as opposed to individual blocks. Given the condensed nature of the development, all facilities are easily accessible to residents. The amenities are accessed independently from the blocks, thereby ensuring that they are tenure blind and enable a shared environment centred around the proposed square.

Whilst all blocks are serviced with a waste management area and bike storage facility, additional BTR supporting facilities and ancillary commercial facilities are distributed throughout the development as detailed in Table 5.5.

Block No.	Nature of Facility	Floor Area
A	Residents Lounge Cinema	70.5sqm
	Gym	99.5sqm
B	Lounge	110sqm
E	Gallery Community	135sqm
	Parcel Room & Concierge	72sqm
	Lounge	58sqm
	Local retail unit	141sqm (gross)
F	Function Room	121.3sqm
	Business Pods	43.3sqm
	Cafe	125.1sqm
G	Co-Working and Lounge	231sqm

Table 5.5 Distribution & Floor Area of Facilities

There are no quantitative standards to guide the provision of BTR services and associated facilities. However, the Linesight Report (*'The Build-to-Rent Sector in Ireland, Analysis and perspectives from key industry stakeholders'*, November 2018) states that between 5% and 10% of net unit areas are typically being designated as amenity space within BTR schemes. The floor area of support facilities and services & amenities within the proposed development equates to 6.1% of the overall net floor

area³ of the apartment units thereby complying with general industry practice. It should be noted that the calculated net floor area in this instance includes Block F, comprising non BTR units, thereby resulting in a very conservative calculation.

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 concierge and storage facilities such that the quantum and quality of build to rent facilities exceeds the requirements of SPPR 7.

5.3.2 SPPR8

SPPR 8 sets out key guiding principles for proposals that qualify as specific BTR developments and an extract of the principles as provided for in the Guidelines are detailed in Figure 5.2.

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.**

Figure 5.2 Extract of SPPR8 from the 2018 Apartment Guidelines

³ Total net floor area of all apartments, including Block F which are not BTR units, but whose residents will nonetheless have access to such facilities, is 38,359sqm

(i) Dwelling Mix

As detailed in Table 5.1 a total of 506 no. BTR units are provided within the overall development of 597 no. units. The proposed BTR units provides for a comprehensive mix of units ranging from studio to four bed units as detailed in Table 5.2. The mix of units and varied unit size provides for diversity in choice and an ability to house different social groups and family structures. The BTR units can be subdivided into BTR Social units (200 no. units) and BTR Cost Rental units (306 no. units).

The unit mix for the BTR Social units has been informed by the social housing requirements of Dún Laoghaire-Rathdown County Council. The current social housing requirement for Area D (Ballybrack / Shankill) is for 1,495 social housing units with a demand of 53% for 1 bed units; 28% for 2 bed units; 18% for 3 bed units; and 0.8% for 4 bed units. The proposed development will provide for 200 no. social housing units comprising 45% of 1 bed units, 40% of 2 bed units, 13.5% of 3 bed units and 1% of 4 bed units, thereby meeting 13% of the overall social housing need.

The mix of BTR Cost Rental units has been influenced by current market conditions and demand having regard to the social and economic profile of the area. Of the 306 no. units proposed within this housing category, some 9% are studio units; 21% are 1 bed units; 56% are 2 bed units and 14% are 3 bed units. The unit mix has been influenced by the need for smaller household sizes and the trend in Ireland of smaller households over the last 50 years. Whilst it is acknowledged that household size increased between 2011 and 2016, evidence suggests that this was due to a lack of supply in housing and as a result the restricted ability to create new households.

A small number (29 no.) of studio apartments are proposed within the development to offer variety in unit type and size thereby encouraging and facilitating diversity in occupation. The provision of studio units also improves affordability for some renters.

The provision of 1 bed units at 21% of the overall cost rental units is relatively high. However, there is a demand for 1 bed units from the young professionals and workers starting out in their career, including foreign workers who may be in Ireland for a limited period of time. The 1 bed units are also suited to the elderly population.

The two bed units comprise 56% of the overall cost rental units. This provision is typical of many other residential schemes throughout Ireland and accommodates the reduced household size. The three bed units are intended to accommodate the larger family unit thereby ensuring diversity and social balance within the overall apartment development.

Overall, the dwelling mix has been carefully considered, reacting to market demand and forecasted population growth and structure. The proposed mix of units will add demographic balance to the area and accommodate diversity in typology given that 91% of all existing residential units within Shanganagh comprises houses / bungalows.

(ii) Storage & Amenity Space

A flexible approach has not been adopted in respect of the provision of storage and amenity space within individual apartments. All of the apartment units proposed within the development, inclusive of the BTR units, have been designed in accordance with minimum requirements set out in the Apartment Guidelines, such that:

- Apartment floor areas are in excess of the minimum floor areas required;

- All apartments are provided with storage contained within each apartment, adequate to satisfy minimum requirements set out in the Guidelines; and
- All apartments have been provided with external or inset balconies in compliance with minimum standards set out in the Guidelines

Detailed consideration of each apartment unit is set out in the Housing Quality Assessment (HQA) prepared by the project architects

(iii) Car Parking

The proposed development accommodates 365 no. car parking spaces and 1,318 no. bicycle parking spaces on site.

Whilst the Dún Laoghaire-Rathdown County Development Plan provides for a maximum of 868 no. spaces, a reduction in car parking standards has been considered in the context of the provisions of the LAP and the Apartment Guidelines.

Objective SC13 in the LAP states that

“A relaxation of private open space standards for terraced, semi-detached or detached housing and car parking provision will be considered in order to achieve higher sustainable densities, subject to design and layout”.

The Apartment Guidelines in Paragraph 4.19 states that,

“In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances. The policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such rail and bus stations located in close proximity”.

The location of the proposed development in proximity to Shankill DART Station and bus stops on the Dublin Road associated with the future provision of a new DART Station at Woodbrook and proposed Bus Connects, supports and justifies a significant reduction in car parking provision in this instance.

An Outline Travel Plan prepared by Punch Consulting accompanies the application for approval and justifies reduced car parking in the context of the location of the site in proximity to services and facilities and in particular the planned public transport infrastructure intended for the area.

Provision of a higher numbers of bicycle parking is intended to mitigate the demand for and result in reduced car parking. The bicycle parking provision is generally in accordance with the provisions of the 2018 Apartment Guidelines and is more than the requirement set out in *DLRCC Standards for Cycling Facilities for New Developments January 2018*.

GoCar, a car sharing facility that allows vehicle rental from a minimum of one hour, have confirmed their commitment to the scheme. A total of 10 Go Car Spaces will be provided at various convenient locations around the site. The GoCar company advise that each GoCar will equate to 15 to 20 privately owned vehicles. Therefore, GoCar parking spaces, suitably located, are an effective mechanism for reducing car parking demand.

The site will be located 200 metres from the nearest bus stop on the R119 Dublin Road after completion of the proposed development road and footpath network. There are four bus routes – 45, 84, 145 and 155 – that service Dublin Road and the site is located 2.4 km from Shankhill Dart Station. The NTA has proposals to introduce the Bus Connects Corridor 13 Bray to City Centre along the R119 Dublin Road adjacent to the site. There is also the proposal to construct a new Dart Station at Woodbrook / Shanganagh. The proposed Dart station would be 965 metres (approximately 12 minutes' walk) from the site and will be accessible via the proposed pedestrian and cycle facilities through Shanganagh Park / Cemetery. These facilities will provide greater public transport capacity, choice and availability at different times throughout the day.

(iv) Spatial Arrangement of Units

The proposed BTR units are proposed with twelve or less units per core as per the architectural drawings submitted with this application.

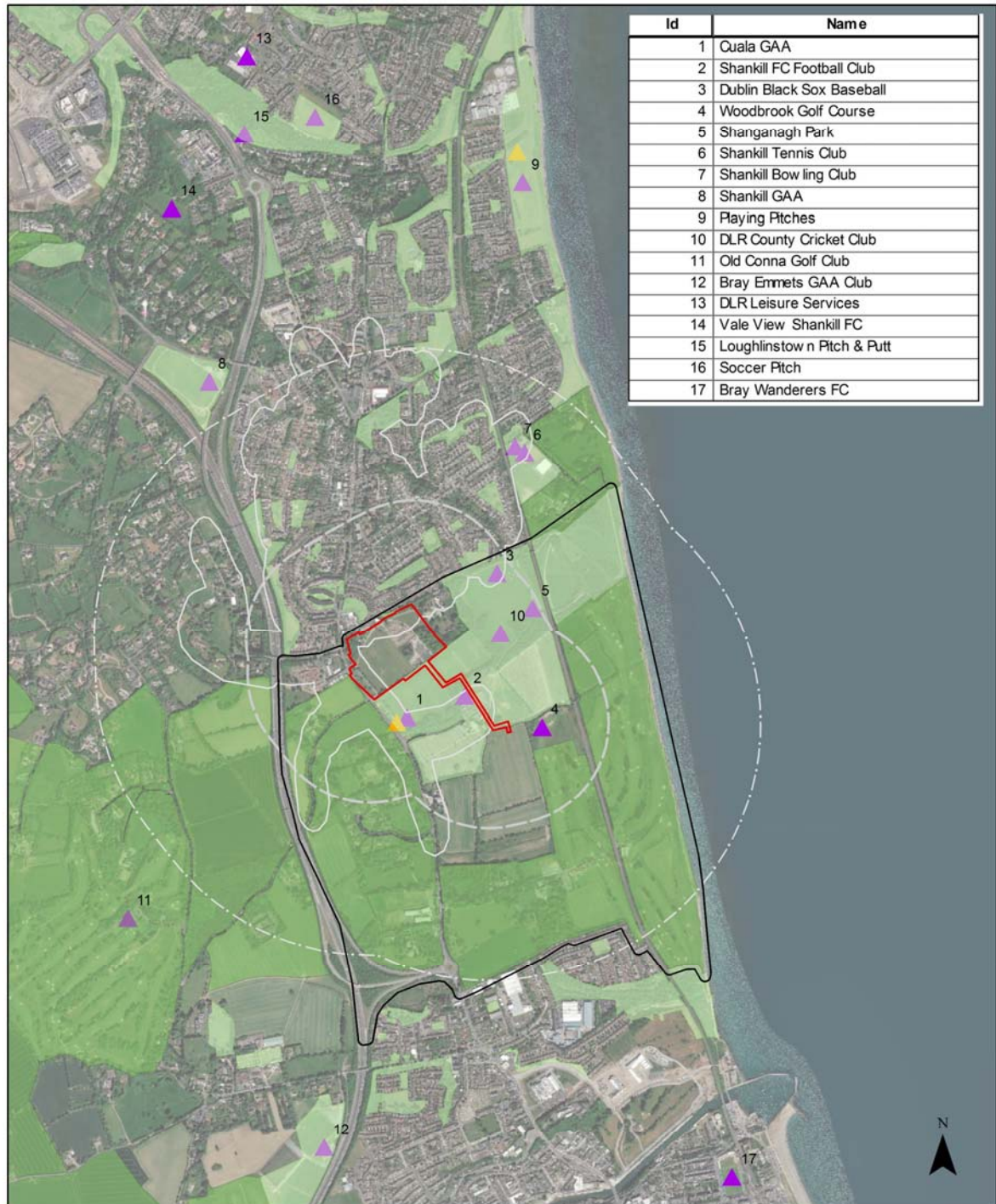
In light of the above, it is considered that the proposed BTR Blocks and associated units proposed within the Shanganagh development accords with the requirements for Build to Rent as set out in the Apartment Guidelines 2018 and that the proposal is consistent with Section 5 of the 2018 Apartment Guidelines

6.0 CONCLUSION

In consideration of the above factors, it is submitted that the proposed development, comprising primarily BTR units, is justified, not only from a need and demand perspective, but also having regard to existing policy provision and the location of the site in proximity to existing and planned services and facilities. The proposed development will facilitate a balance within the housing market providing for an alternative form to the traditional house and offering a cost rental product not immediately available in the area.

The proposed development will accommodate the development of a new sustainable community within Shanganagh, which will be capable of integration into the existing and proposed new neighbourhood structure with adequate pedestrian and cycling connectivity, apartment services and facilities and significant communal open space. In addition, the recreational facilities of Shanganagh Park are on its doorstep.

As such it is submitted that the proposed development is in accordance with the proper planning and sustainable development of the area.



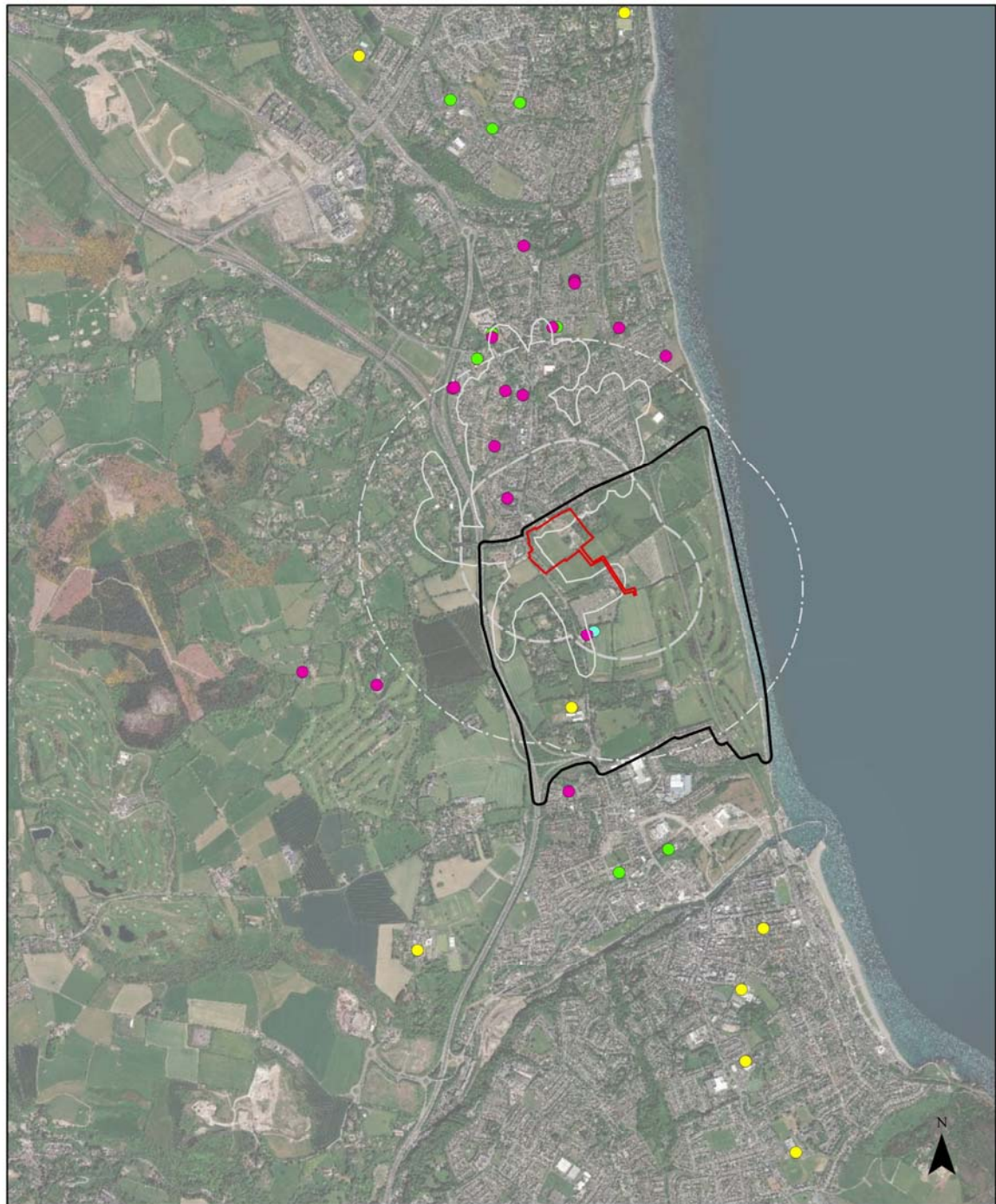
0 250 500 1,000 Meters

- Site Boundary
- LAP Boundary
- 15 Minute Walktime
- 400m from the site
- 1000m from the site
- ▲ Playground
- ▲ Sports & Recreation Areas (refer to inset table)
- Open Space landuse zoning
- Conservation / Amenity Space landuse zoning



Appendix 1.0 Sports, Recreation & Open Space – Indicative site location outlined in red





0 0.75 1.5 3 Kilometers

- | | | | |
|---|---------------------|---|-----------------------------|
|  | Site Boundary |  | Childcare Facilities |
|  | LAP Boundary |  | Primary School |
|  | 15 Minute Walktime |  | Proposed New Primary School |
|  | 400m from the site |  | Secondary School |
|  | 1000m from the site | | |



Appendix 3.0 Childcare & Educational Facilities – Indicative site location outlined in red

