

COASTAL QUARTER SHD NO. 2

Housing and Tenure Types and Mix Report

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Coastal Quarter SHD, Bray
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UNIT MIX REPORT

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Contents

1	INTRODUCTION	1
2	PROPOSED DEVELOPMENT	3
2.1	Unit Mix	3
2.2	Tenure Type and Mix	5
2.3	Build to Rent Proposals	6
2.4	Part V	6
2.5	Addressing the Needs of Older People and Persons with a Disability	6
2.6	Adaptability	7
3	NATIONAL AND REGIONAL POLICY AND GUIDANCE CONTEXT	8
3.1	National Planning Framework	8
3.2	Quality Housing for Sustainable Communities	8
3.3	Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020	9
3.3.1	Unit Mix and Type	9
3.3.2	Tenure: Build to Rent	10
3.4	Housing Supply Target Methodology for Development Planning	11
3.5	Regional Spatial and Economic Strategy	11
4	STATUTORY PLANNING POLICY	13
4.1	Wicklow County Development Plan 2016-2022	13
4.1.1	Housing Type and Mix	13
4.1.2	Tenure Mix	13
4.2	Draft Wicklow County Development Plan 2022 - 2028	14
4.2.1	Housing Type and Mix	14
4.2.2	Tenure Mix	15
4.3	Bray Municipal District Local Area Plan 2018 – 2024	15
4.4	Dún Laoghaire-Rathdown Development Plan 2022-2028	15
4.4.1	Housing Type and Mix	15
4.4.2	Tenure Mix	17
5	POPULATION DEMOGRAPHICS	19
5.1	Population Age Structure	19
5.2	Households and Housing	19
6	LOCAL SITE CONTEXT	22
6.1	Existing and Permitted Housing Stock	22
6.2	Site Context - Accessibility and Connectivity	26
7	ASSESSMENT OF HOUSING MIX AND TENURE	28
7.1	Suitability of Overall Residential Type and Unit Mix	28
7.2	Compliance with Quantitative Standards	29
7.3	Tenure Mix and Type	30
7.4	Suitability of site for Build to Rent	30
7.5	Suitability of Proposed Resident Facilities and Amenities within BTR Block A	31
8	CONCLUSIONS	32

Tables

Table 2-1: Proposed Units	3
Table 2-2: Schedule of Residential Units and Areas	4
Table 2-3: Proposed Overall Residential Unit Mix by Type	4
Table 2-4: Proposed Overall Unit Mix	5
Table 2-5: Tenure Types Proposed Within Development	5
Table 2-6: Proposed Overall Residential Unit Mix by Type and Tenure	5
Table 2-7: Community and Recreational Amenity Provision within Block A Build to Rent	6
Table 4-1: Apartment Mix Requirements for Existing Built Up Area extracted from Table 12.1 (page 237) of DLR County Plan 2022-2018	16
Table 5-1: Population Structure by Age	19
Table 5-2: Size of Household in Wicklow and DLR in 2016	20
Table 5-3: Private Housing By Type	21
Table 6-1: Existing and Permitted Residential Uses within 10-minute Walking Catchment by Housing Type, Mix and Tenure	23
Table 6-2: Size of Household	24
Table 6-3: Private Housing by Type	25
Table 7-1: Proposed Overall Residential Unit Mix	28
Table 7-2: Proposed Residential Unit Mix by Type	28
Table 7-3: Quantitative Assessment of Apartment Size Mix	29
Table 7-4: Proposed Overall Residential Unit Mix by Type and Tenure	30

Figures

Figure 5-1: Average Household Size - Ireland	20
Figure 6-1: 10-minute walking catchment from Application Site	22
Figure 6-2: 10-minute walking catchment from Application Site	25
Figure 6-3: Walking and Cycle Distances and Travel Times to Bray Town Centre	26
Figure 6-4: Walking and Cycle Distances and Travel Times to Bray DART Station	27

1 INTRODUCTION

This *Housing and Tenure Types and Mix Report* has been prepared by RPS on behalf of Shankill Property Investments Ltd to support a planning application for a proposed Strategic Housing Development (SHD) at lands off the Dublin Road and Ravenswell Road within the former Bray Golf Course lands, Bray, County Wicklow and County Dublin.

The current application seeks permission for a development comprising 586 no. residential units in a mix of apartments, duplexes and houses. In addition, a childcare facility, café, retail unit and a mixed use commercial unit are proposed along with all associated and ancillary development and infrastructural works, hard and soft landscaping, open spaces, boundary treatment works, ancillary car and bicycle parking spaces at surface, undercroft and basement levels. The proposed houses and duplexes range in height from 2–3 storeys with the proposed 4 no. apartment blocks ranging in height from 3 – 12 storeys. Block A will accommodate 162 no. Build to Rent (BTR) units. It is proposed that 274 no. units will be located within the administrative area of Dún Laoghaire-Rathdown County Council (DLRCC) and 312 no. units will be located within the administrative area of Wicklow County Council (WCC). The childcare facility, retail, café and commercial unit will all be located in the administrative area of WCC.

Planning permission was previously granted by Order of An Bord Pleanála (the Board) under reference ABP-311181-21 on part of the subject site for 234 no. residential units, a childcare facility, café and retail unit, subject to a number of conditions. The current application incorporates the entire site again seeking permission for those elements of the development as previously permitted under ABP-311181-21 as well as permission for development on those parts of the site which were previously refused permission under ABP-311181-21 (these comprise the proposed Blocks A and B).

This report has been prepared to present a rationale for the housing mix proposed with regard to the site context, the provisions of the *Dún Laoghaire Rathdown County Development Plan 2022 – 2028* (DLR County Plan), *Wicklow County Development Plan 2016-2022* (Wicklow County Plan) and the *Bray Municipal District Local Area Plan 2018 – 2024* (Bray LAP). The report also considers the tenure mix and tenure type proposed within the overall scheme and presents a rationale as to why these proposals are appropriate at the subject site. This aspect of the report relating to tenure responds to part of Issue 2 identified in the Pre-Application Consultation Opinion (ABP-312257-21) as needing to be addressed in the application documents which could result in them constituting a reasonable basis for an application for SHD.

The 234 no. residential units which were previously permitted under ABP-311181-21 comprise all of the houses and duplexes within the scheme as well as apartment Blocks C and D. These units are proposed within this current application as previously permitted (having regard to relevant conditions of the ABP-311181-21). Proposed Blocks A and B are proposed on those parts of the site which were previously refused permission. As the entire development comprises a single scheme and application, the assessment presented is on the basis of the entire proposed development, i.e. both those elements proposed as previously permitted and Blocks A and B.

Accordingly, this assessment also has regard to the Opinion issued by the Board following the pre-application consultation held in respect of Ref. ABP-312257-21. In particular, that Opinion pursuant to article 285(5)(b) of the *Planning and Development (Strategic Housing Development) Regulations 2017*, notified the prospective applicant that, in addition to the requirements as specified in articles 297 and 298 of the *Planning and Development (Strategic Housing Development) Regulations 2017*, specific information should be submitted with any application for permission and which includes a report that addresses and provides a justification for the proposed housing mix. This unit and tenure mix assessment also references any other relevant considerations which arose in the course of consultation with the Board in respect of ABP-311181-21.

This report provides an analysis of the proposed residential unit mix and tenure mix and type in the context of:

- Relevant national and regional strategic and planning policy and guidance,
- Statutory planning policy,

UNIT MIX REPORT

- Local population demographics including prevailing household sizes in the surrounding area, and
- The housing mix and tenure type of existing and permitted housing stock within a 10-minute walking catchment of the subject site.

The assessment concludes that the proposed development represents an appropriate housing and tenure mix and type.

2 PROPOSED DEVELOPMENT

The proposed development comprises 586 no. residential units made up houses, duplexes and apartments. 234 no. units are proposed as previously permitted with an additional proposed 352 no. units proposed. Various details of the unit and tenure mix of the proposed development are set out in the following sections and tables.

2.1 Unit Mix

The principal details of the proposed development are provided in **Table 2-1**.

Table 2-1: Proposed Units

Apartments	No. of Units
Block A (162 units)	
1-bedroom	79
2-bedroom	76
3-bedroom	7
Block B (190 units)	
1-bedroom	94
2-bedroom	86
3-bedroom	10
Block C (80 units)	
1-bedroom	45
2-bedroom	31
3-bedroom	4
Block D (26 units)	
1-bedroom	20
2-bedroom	6
Duplex Apartments	
1-bedroom	0
2-bedroom	26
3-bedroom	26
Houses	
2-bedroom	13
3-bedroom	51
4-bedroom	12
TOTAL	586

Source: Glenn Howells Architects Unit Schedules

Note: Units identified in grey are proposed as previously permitted under ABP-311181-21; units in green are additional proposed units.

Other proposed development can be summarised as follows:

- Residential amenities, basement and below podium parking at ground level incorporating car parking, cycle parking, plant rooms and waste management facilities.
- Commercial unit (Gym and juice bar GFA of 512 sq.m.) within Block B.
- Childcare facility (GFA of 627 sq.m.), café (GFA of 195 sq.m.) and retail unit (GFA of 249 sq.m.) within Block C.

A detailed schedule of the proposed units is set out in **Table 2-2** and includes the minimum floor area for each unit, a summary of the proposed overall residential unit mix by type is set out in **Table 2-3** and a summary of the proposed overall residential unit mix is set out in **Table 2-4** where it is also broken down by planning authority area.

Table 2-2: Schedule of Residential Units and Areas

Schedule of Units and Areas		
Apartments	No. of Units	Minimum Area
Block A (162 units)		
1-bedroom	79	48 sq.m. (NIA) ¹
2-bedroom	76	74 sq.m. (NIA)
3-bedroom	7	95 sq.m. (NIA)
Block B (190 units)		
1-bedroom	94	48 sq.m. (NIA)
2-bedroom	86	76 sq.m. (NIA)
3-bedroom	10	94 sq.m. (NIA)
Block C (80 units)		
1-bedroom	45	50 sq.m. (NIA)
2-bedroom	31	74 sq.m. (NIA)
3-bedroom	4	135 sq.m. (NIA)
Block D (26 units)		
1-bedroom	20	50 sq.m. (NIA)
2-bedroom	6	88 sq.m. (NIA)
Duplex Apartments		
2-bedroom	26	88 sq.m. (GIA) ²
3-bedroom	26	115 sq.m. (GIA)
Houses		
2-bedroom	13	90 sq.m. (GIA)
3-bedroom	51	110 sq.m. (GIA)
4-bedroom	12	168 sq.m. (GIA)

Source: Glenn Howells Architects

Note: Units identified in grey are proposed as previously permitted under ABP-311181-21; units in green are additional proposed units.

Table 2-3: Proposed Overall Residential Unit Mix by Type

Proposed Overall Residential Unit Mix	
Apartment Type	
	No. of Units
1-bedroom	238 units
2-bedroom	199 units
3-bedroom	21 units
Sub-Total	458 Apt Units
Duplex Type	
2-bedroom	26
3-bedroom	26
Sub-Total	52 Duplex Units
House Type	
2-bedroom	13
3-bedroom	51
4-bedroom	12
Sub-Total	76 House Units
Total	586 Units

Source: Glenn Howells Architects

¹ NIA: Net Internal Area including all apartment internal floor areas only.

² GIA: Gross Internal Area

Table 2-4: Proposed Overall Unit Mix

Proposed Overall Residential Unit Mix						
Type	No. Units DLR	% Units DLR	No. Units WCC	% Units WCC	Total No. of Units	Total % of Development Units
1-bedroom	99	36%	139	45%	238 units	40.5%
2-bedroom	110	40%	128	41%	238 units	40.5%
3-bedroom	54	20%	44	14%	98 units	17%
4-bedroom	11	4%	1	-	12 units	2%
Total	274 Units		312 Units		586 Units	100%

Source: Glenn Howells Architects

2.2 Tenure Type and Mix

There is a mix of tenure types proposed at the site. This comprises Part V social units, Build to Rent units and private development as identified in Table 2-5.

Table 2-5: Tenure Types Proposed Within Development

Development Element	Tenure Type(s)
Block A	Build to Rent
Block B	Private Development
Block C	Part V Social Housing
Block D	Part V Social Housing
Duplex Type	Private Development and 1 No. Part V Social
Houses	Private Development

Source: Glenn Howells Architects

Table 2-6 presents the overall proposed residential mix by tenure type.

Table 2-6: Proposed Overall Residential Unit Mix by Type and Tenure

Proposed Overall Residential Unit Mix				
Apartment Type	No. of Units by Tenure			Total No. Units
	Part V	Private Development	Build to Rent	
1-bedroom	40	119	79	238 units
2-bedroom	20	103	76	199 units
3-bedroom	-	14	7	21 units
Sub-Total	60	236	162	458 Apt Units
Duplex Type	-			
2-bedroom	1	25	-	26
3-bedroom	1	25	-	26
Sub-Total	2	50		52 Duplex Units
House Type				
2-bedroom	-	13	-	13
3-bedroom	-	51	-	51
4-bedroom	-	12	-	12
Sub-Total	0	76		76 House Units
Total	62	362	162	586 Units
Total Tenure Percentages	10.6%	61.8%	27.6%	100%

Source: Glenn Howells Architects

2.3 Build to Rent Proposals

Block A is proposed as a specific BTR development. In addition to the ownership and management of BTR development by a single entity it has a number of other characteristics including resident amenities and support facilities. Community and recreational amenities proposed within Block A are listed in detail in **Table 2-7**.

Table 2-7: Community and Recreational Amenity Provision within Block A Build to Rent

Community and Recreational Amenities Proposed in Block A	
Resident Support Facilities	
Concierge and management facilities	Concierge and management services will be provided within the general residential amenity areas proposed for Block A.
Maintenance and Repair Services	There will spaces provided within the bike storage areas for bike repair and cleaning activities
Waste Management Facilities	There are two bin storage / waste management areas proposed to ensure short travel distances and ease of access for all. These are both situated adjacent to lifts and staircases
Bulky Storage Area	There is a storage area of 41sqm proposed at ground floor for use by residents
Resident Services and Amenities	
Communal recreation	There are three general amenity areas proposed within Block A; one two storey area at the main entrance to Block A2 (187sq.m.), one at ground floor level at the entrance to Block A2 (104sq.m) and a further area at first floor / podium level in Block A2 (219sq.m.). These will comprise areas for residents to meet and socialise, as well as areas for working and a residents gym area.
Other communal activities (workspaces, etc)	The general residential amenity areas will include areas of work spaces and a residents gym

Source: Applicant

2.4 Part V

In accordance with Section 96, Part V of the *Planning and Development Act 2000*, as amended, a total of 62 no. units will be transferred to the planning authorities for social and affordable housing in Blocks C and D. It is proposed that a mix of unit types be transferred to the planning authorities, comprising 40 no. 1-bedroom apartment units, 21 no. 2-bedroom apartment units and 1 no. 3-bedroom duplex apartment unit

2.5 Addressing the Needs of Older People and Persons with a Disability

Just as for all cohorts of the population, older people and persons with a disability can have a variety of accommodation needs. There are a number of particular characteristics however which are required and / or are very beneficial to older people and persons with a disability. These include:

- External access to dwelling to be wheelchair accessible;
- Interior of dwelling being wheelchair accessible;
- All accommodation provided on single floor plate;
- Immediate access to outdoor private open space;
- Ease of access and short travel distance to parking and service amenity areas;
- Enhanced security; and
- Suitably sized units for smaller household sizes – often one or two person households and / or space for carers / assistants.

All but one of the Part V proposed units are single floor units and are designed to be fully wheelchair accessible which will benefit wheelchair users and other persons with mobility challenges. The Part V comprises much of Block C, Block D and a duplex apartment unit.

The Block C and D Part V units comprise a mix of 1-bedroom and 2-bedroom units. A separate end of terrace duplex unit is also proposed which incorporates a 2-bedroom unit and a 3-bedroom unit. All of the proposed Part V units (other than the 3 bed duplex) are fully wheelchair accessible, which will benefit wheelchair users and other persons with mobility challenges.

In Block C there are 4 no. 3-bedroom duplex apartments with own door access at podium level. These units would provide the equivalent internal accommodation as a house along with directly accessible outdoor open space but would achieve a higher degree of security and passive overlooking than a standard housing development typically would. These units would be particularly suitable for residents with vulnerabilities which may benefit from enhanced security.

In Block D there are 3 no. ground floor 1-bedroom units which each have private outside open space which are at ground level. These provide an option for external access directly to the unit without the need to travel through the building to the main entrance. This will potentially shorten travel distances to some parts of the site. In particular they will provide for easy access from these units to the neighbouring communal area immediately to the west.

Block C comprises two wings with up to 9 no. units per floor / core. Comprising of only 1-bedroom and 2-bedroom units, the overall floor areas, and accordingly travel distances to the core and onward to parking and service facilities at ground floor, are modest.

Car parking for Block D is provided at ground floor level. Also at ground level are bike store areas, and a refuse store. With ease of access to services and parking facility at this single level the ground floor apartment units will be particularly suited for older persons or persons with a disability for whom short travel distances are beneficial. For residents of the upper floors while they may be required to use the elevator, the travel distances in this block remain short for all to the main entrance, vehicular and cycle parking areas and the waste area.

Apart from the wheelchair accessible Part V units, there are also other provisions provided in the wider development which will benefit older persons and / or those with a disability. In this regard, all houses and apartments will have Part-M compliant access into the buildings. In addition, within the apartment blocks, all floor levels will be fully accessible by lift with all disabled car parking spaces located as close as possible to the lift cores.

2.6 Adaptability

The house types in the proposed scheme offer more adaptability than the apartments. All houses at a minimum are capable of being extended to the rear at a future date, offering the ability to provide additional living space for growing households or changing needs.

In addition, there is an option for an additional room been added to the attic space of houses. The two/three-bedroomed houses that are located along the home zone or community streets offer the most opportunity for future adaptability. For this house type, the placement of an extra flight of stairs leading from the first floor up to the roof space is an option for future adaptability without impacting on the visual character of the house. The steep pitch of the roof and the ability to add roof lights on the garden side of the house will facilitate future changes to be carried out with relative ease as the roof trusses will be timber.

Many of the houses include dedicated home working spaces that can be adapted as additional guest accommodation or storage should the need arise.

Apartments offer less physical adaptability compared to individual houses. In terms of physical adaptability, apartment buildings are predominantly concrete column and slab construction as this allows all walls to be of lightweight construction and non-load bearing. This offers the opportunity to be able to modify apartment layouts if required or merge / split apartments at a future point in time if circumstances dictate, although this is an unusual scenario that rarely if ever occurs. The apartment buildings have a range of shared residents amenity spaces which can be adapted for different uses as new demands evolve. For example, if co-working space became less attractive to tenants at a future date it can be converted into lounge space or vice versa.

3 NATIONAL AND REGIONAL POLICY AND GUIDANCE CONTEXT

3.1 National Planning Framework

The *National Development Plan* and the *National Planning Framework* combine to form *Project Ireland 2040* the government's long-term overarching strategy to make Ireland a better country for all of its people. The *National Planning Framework* (NPF) is the Government's high-level plan for the future development of Ireland, with a particular focus on strategic growth and housing. The NPF aims to avoid urban sprawl by promoting increased residential densities in urban areas, consequently reducing pressure on infrastructure demands and adverse impacts on the environment.

The NPF seeks to deliver 550,000 new homes by 2040, with **National Policy Objective 33** stating that it is a national policy to “*prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*” (page 92) The NPF expands on this objective, explaining that the future homes of Ireland will be built in locations that support sustainable development such as cities and larger towns with provision of infrastructure and access to services that can be delivered in an efficient and appropriate way.

National Policy Objective 3b states that it is an objective of the NPF to “*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.*” (page 29) In delivering these new homes the NPF aims to achieve inclusive and sustainable communities that are finished to a high standard.

In this regard, **National Policy Objective 4** promotes the delivery of mixed communities and seeks to:

“ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.” (page 55)

In accordance with these national policy objectives, it is submitted that the proposed development will provide a high-quality residential development within the Dublin Metropolitan Area, and in close proximity to existing schools, community facilities, retail services and employment areas. The proposed development will include a mix of unit types, open space, vehicular and pedestrian infrastructure that will be delivered through a high-quality integrated layout that connects to adjacent existing and future housing areas. It is therefore considered that the proposed development will contribute to the creation of a sustainable neighbourhood at this highly accessible location in accordance with the national policy objectives set out in the NPF.

3.2 Quality Housing for Sustainable Communities

In 2007 the Department of the Environment, Heritage and Local Government published *Quality Housing for Sustainable Communities* (the Housing Guidelines). The aim of the Housing Guidelines is to identify principles and criteria that are important in the design of housing and to highlight relevant specific design features, requirements and standards. The mix of units within a development is one of the criteria considered in the Housing Guidelines. As a general principle the Housing Guidelines state:

“The mix of dwelling type, size and tenure should support sound social, environmental and economic sustainability policy objectives for the area.”

More specifically the Housing Guidelines state:

“Regard should be had to current best estimates regarding the size and type of households likely to seek housing in the future and to the need to achieve a balanced mix of dwelling types, sizes and tenure, both in the immediate locality and in the housing stock as a whole. Larger schemes should be

³ On the basis of National Policy Objective 2a, this effectively targets 25% of all new homes nationally within the five cities and their suburbs as defined by the CSO in the Census of Population.

designed to accommodate a balanced range of household sizes and types, including apartments, duplex units and sheltered housing, where appropriate.”

The Housing Guidelines also acknowledge that the unit mix, “*should be informed by the relevant Local Authority Housing Strategy*”.

The proposed development includes a mix of unit types in a location proximate to Bray town centre and served by existing and planned high capacity public transport. The proposed development is considered to accord with the principles and guidance provided in the Housing Guidelines with regard to social, environmental and economic sustainability. The proposed development shall also help deliver a balanced mix of dwelling types in the wider area as further outlined in **Sections 5** and **6** of this report.

The consistency of the proposed scheme with local planning policy as supported by the Housing Guidelines is detailed in **Section 4** of this report.

3.3 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020

3.3.1 Unit Mix and Type

In December 2020, the Department of Housing Local Government and Heritage published the updated *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2020* (the Apartment Standards). The guidelines take account of the need to enhance apartment output to secure both additional housing supply and more compact urban development patterns, and of departmental and stakeholder research and analysis into the deliverability of increased supply of apartments. The guidelines provide updated guidance having regard for current and likely future housing demand in Ireland, taking account of the Housing Agency National Statement on Housing Demand and Supply, the Government’s action programme on housing and homelessness *Rebuilding Ireland, Project Ireland 2040* and the NPF.

The Apartment Standards set parameters with regard to the various elements of an apartment development including *inter alia* apartment unit mix, dual aspect ratios, floor to ceiling height, amenity space, room sizes and car parking. While several of these parameters are guidelines based on best practice, the Apartment Standards also include Specific Planning Policy Requirements (SPPR) which take precedence over any conflicting policies or objectives set out in Development Plans or Local Area Plans.

The Apartment Standards aim to:

- *“Enable a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas;*
- *Make better provision for building refurbishment and small-scale urban infill schemes;*
- *Address the emerging ‘build to rent’ and ‘shared accommodation’ sectors; and*
- *Remove requirements for car-parking in certain circumstances where there are better mobility solutions and to reduce costs” (page 2)*

Section 2.18 of the Apartment Standards considers unit mix and states that “*in the context of sustainably increasing housing supply, targeting a greater proportion of urban housing development and matching to the type of housing required, there is a need for greater flexibility.*” (page 8). In this context, SPPR 1 states that:

“Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).” (page 9)

Regarding the provisions of SPPR 1, the proposed apartment unit mix is in accordance with the Apartment Standards. As set out in **Section 2** of this report, the proposed development does not include any studio units and will comprise of 239 no. 1-bedroom apartment units. This equates to 47% of the total number of apartments (including duplex units) or 41% of total units.

SPPR 1 does not set limits on the level of 2-bedroom type units that are provided in a single development.

SPPR 1 states there is no minimum requirements for 3-bedroom units. The development includes 47 no. 3-bedroom apartment units (21 no. within apartment blocks and 26 no. in duplex units) (9% of the total number of apartments (including duplex units)). The total quantum of 3 or 4-bedroom units (110 no. units) proposed within the entire development comprises 19% of all units.

Section 3.7 of the Apartment Standards recommends that no more than 10% of the total number of units in any private residential development may comprise 2-bedroom 3-person apartment. There are 3 no. 2-bedroom 3-person apartment units in total which is less than 1% of the total number of apartments (including duplex units). These are located within Block C.

The housing mix accords with the specific requirements of the Apartment Standards and the general presumption within the Apartment Standards for flexibility and a range of unit sizes and types.

3.3.2 Tenure: Build to Rent

The Guidelines include specific policy for Build to Rent development. A number of the provisions of the Guidelines in respect of Build to Rent proposals are considered of relevance to this application.

The Guidelines in the first instance identify the role and benefits BTR can bring to the housing market. It states that,

“These types of housing developments also have a potential role to play in providing choice and flexibility to people and in supporting economic growth and access to jobs in Ireland. They can provide a viable long term housing solution to households where home-ownership may not be a priority, such people starting out on their careers and who frequently move between countries in the pursuance of career and skills development in the modern knowledge-based economy.”

In the case of the current proposal, the BTR Block A will comprise 28% of the overall wider Coastal Quarter development. In this regard, it will expand the range of housing tenure and options available in Bray. In particular in a scheme which would otherwise comprise of 90% private development (some of which may enter the rental market on an ad hoc manner), the provision of specific rental accommodation managed by a single entity will present opportunities for people who may otherwise not be interested in or in a position to purchase property.

The provision of resident amenities is identified as a specific characteristic of BTR:

“The provision of dedicated amenities and facilities specifically for residents is usually a characteristic element. The provision of such facilities contributes to the creation of a shared environment where individual renters become more integrated and develop a sense of belonging with their neighbours in the scheme. This provides the opportunity for renters to be part of a community and seek to remain a tenant in the longer term, rather than a more transient development characterised by shorter duration tenancies that are less compatible with a long term investment model.”

In this regard, the range of residential amenities provided within proposed Block A are identified in **section 2.3** of this report above. These facilities provide a higher level of amenity and services for future residents than the Apartment guidelines otherwise standardly require for apartment development.

Paragraph 5.11 of the Guidelines states that,

“While all BTR developments will be required to provide satisfactory resident support facilities, the nature and extent of the resident services and amenities may be agreed by the project developer and the planning authority having regard to the scale, intended location and market for the proposed development. The provision of specific BTR amenities to renters will vary and the developer will be

required to provide an evidence basis that the proposed facilities are appropriate to the intended rental market.”

The nature of the residential amenities proposed in Block A are set out in **section 2.3**, and a rationale for the suitability of these amenities and services for the intended rental market is provided in **section 7.5**. It should also be noted that the BTR apartments proposed in Block A are of the same standard as the apartments proposed elsewhere in the scheme. No studio units are proposed. The apartments all meet the minimum areas specified for non-BTR apartments and more than 50% of the units are 10% larger than the minimum areas. All apartments have private open space in the form of balconies and terraces that comply with standards for non-BTR apartments.

3.4 Housing Supply Target Methodology for Development Planning

In December 2020 the Department of Housing, Local Government and Heritage published the *Housing Supply Target Methodology for Development Planning - Guidelines for Planning Authorities* (Housing Supply Guidelines) issued under Section 28 of the *Planning and Development Act, 2000 (as amended)* with the aim of strengthening the relationship between national and regional population projections and their integration into the development planning process at local authority level. The document provides very limited guidance on housing types / sizes and is more concerned with overall housing supply.

In support of the Guidelines the ESRI published *Regional Demographics and Structural Housing Demand at County Level*. The report notes that headship rates had been steadily increasing in Ireland at a national level up to the 2008 economic downturn. Such a trend has resulted in smaller household sizes.

With regard to types of housing demand the report finds that there may be changes in the demand for different types of housing units up to 2040 and identifies population age and regional variation as key determinants of demand for particular housing types and notes:

“Combining the projected path of the population for each local authority with the observed differences in the mix of housing types, it could be possible to create an approximation to how the demand for different housing types could evolve up to 2040.” (page 39)

The ESRI report does not provide projections on housing type demand within planning authority areas. However, the general findings reported including higher headship rates and lower household sizes, which would suggest the provision of a significant quantum of 1-bedroom and 2-bedroom units within the Dublin Metropolitan Area would be appropriate.

The DLR County Plan does contain a Housing Strategy incorporating and based on a Housing Need Demand Assessment (HNDA). This HNDA also identifies the need for significant numbers of smaller units based on emerging household patterns and existing housing stock. Neither the Wicklow County Plan nor the *Draft Wicklow County Development Plan 2022-2028* (Draft Wicklow County Plan) contains a HNDA.

3.5 Regional Spatial and Economic Strategy

The *Regional Spatial and Economic Strategy for the Midland and Eastern Region* (RSES) provides regional planning policy in accordance with the NPF and the economic policies and objectives set out therein. The RSES aims to promote sustainable growth in identified towns and cities, covering 12 local authorities, including DLRCC and WCC. In this regard, Regional Policy Objective 5.4 promotes high density living in the Dublin Metropolitan Area and states that:

“Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the ‘Sustainable Residential Development in Urban Areas ‘Sustainable Urban Housing; Design Standards for New Apartments Guidelines’ and ‘Urban Development and Building Heights Guidelines for Planning Authorities.’” (page 112)

The RSES further expands on this objective and explains that in order to provide compact sustainable growth and deliver accelerated housing they must “*promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, to achieve a target to 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs, and at least 30% in other settlements.*” (page 101)

The importance of an appropriate housing mix is acknowledged in RPO 5.5:

“Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP)”

The RSES designates Bray as one of only three “Key Towns” within the metropolitan area. These key towns are described as:

“Large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres.”

With specific reference to Bray the RSES notes the former Bray Golf course and Harbour Lands are designated for high density new mixed-use development and RPO 4.37 supports the “*development of major schemes at the former Bray golf course and Bray Harbour*”.

Having regard for the above, it is highlighted that the proposed development has been designed with consideration for strategic growth on an identified site within the Dublin Metropolitan area, in accordance with the policy objectives set out in the RSES. This development promotes sustainable growth by ensuring the provision of new housing on a site that has been zoned for residential development in close proximity to existing schools, community facilities, retail services and employment. It is therefore considered that this development and the unit mix accords with the RSES vision of high-density mixed use development at the site.

4 STATUTORY PLANNING POLICY

4.1 Wicklow County Development Plan 2016-2022

4.1.1 Housing Type and Mix

The Wicklow County Plan sets out an overall strategy for the planning and sustainable development of the areas within the jurisdiction of WCC. Future development of the subject lands is governed by the Development Plan which sets out planning policies and objectives, as well as design standards for the administrative area.

With specific regard to housing mix the Wicklow County Plan states:

HD13 *“Apartments generally will only be permitted within the designated centres in settlements (i.e. designated town, village or neighbourhood centres), on mixed use designated lands (that are suitable for residential uses as part of the mix component) or within 10 minutes walking distance of a train or light rail station.*

HD15: *“Within medium to large scale housing developments, a range of unit types / sizes shall be provided, including bungalows (this requirement does not apply to apartment only developments).”*

HS7: *“To require all applicants for permission that will include social housing to engage in meaningful pre-planning discussions with both the Housing and Planning Authorities, in order to establish at the outset the location, house size and house design requirements of both Authorities.”*

Appendix 1: *“New apartment developments will be required to include a range of unit sizes to cater for different housing needs.”*

The Wicklow County Plan Development and Design Standards states with regard to unit sizes and formats:

“All medium to large scale housing developments shall include a range of house types and sizes, including detached houses, semi – detached, terraces, townhouses, duplexes and bungalows; unless otherwise specified by the Planning Authority;

New apartment developments will be required to include a range of unit sizes to cater for different housing needs;”

The proposed development is located within Bray, a level 1 town in the County Hierarchy, c. 800m from a Dart Station and adjacent to a planned Luas line. A range of unit types / sizes are proposed, as detailed in **Section 2**, including ground floor apartments which function similar to bungalows in providing particularly easy access for those with limited mobility. It should be noted that the Inspector’s Report on Recommended Opinion ABP-308291-20 stated *“given the nature of the development bungalows would not be required in this instance”*.

The proposed unit mix is considered to comply with the guidance provided in the plan.

4.1.2 Tenure Mix

The Wicklow County Plan does not contain detailed or specific policy or guidance in respect of tenure mix. It does however identify the need to accommodate different categories of households, which can of course with all housing demands include different tenure types. Chapter 4 of the plan relating to Housing does note that the proposed framework for the delivery of housing set out in the plan does aim to ensure that *“a range of house types and tenures are delivered, to cater for all in society”* amongst other aims.

The plan contain an objective for the delivery of Part V.

HD4 *“To implement the provisions of the Wicklow Housing Strategy and in particular, to require that 10% of all zoned land developed for residential use, or for a mixture of residential and other uses, shall be devoted to social housing”*.

Within the WCC part of the site the proposal incorporates Part V and private development. The mix of private development proposed is capable of delivering different tenure options in the future, as it offers various housing formats which would be suitable for the private rental market as well as owner occupier.

4.2 Draft Wicklow County Development Plan 2022 - 2028

4.2.1 Housing Type and Mix

As noted in section 3.5 the Draft Wicklow County Plan does not include a HNDA. It is the intention of WCC to undertake a HNDA in due course and that it will vary the plan if necessary at that time. Therefore, until that time the Draft Plan as amended advises that the housing strategy shall be considered an 'interim' one. The Interim Housing Strategy does not include specific targets for tenure or housing mix other than for Social Housing provision. It does however contain some general objectives as follows:

"HS9 To require that 10% of all zoned land developed for residential use, or for a mixture of residential and other uses, shall be devoted to social housing. In certain circumstances as set out in the Affordable Housing Act 2021, this requirement will be 20% devoted to social and affordable housing."

"HS12 To require new multi-unit residential development to provide an appropriate mix of unit types and sizes to ensure that there is a range unit types available to suit the needs of the various households in the county."

Relevant policies and objectives set out in the main body of the Development Plan at Chapter 6 – Housing are as follows:

"CPO 6.9 To implement the provisions of the Wicklow Housing Strategy and in particular, to apply a 10% (or a greater percentage if provided for in future legislation) social housing requirement pursuant to Part V of the Planning and Development Act 2000 (as amended) to land zoned for residential use, or for a mixture of residential or other uses, except where the development would be exempted from this requirement. In certain circumstances as set out in the Affordable Housing Act 2021, this requirement will be 20% devoted to social and affordable housing."

"CPO 6.27 To require new multi-unit residential development to provide an appropriate mix of unit types and sizes to ensure that there is a range of unit types available to suit the needs of the various households in the county, in accordance with the Design Standards for new Apartments, Guidelines for Planning Authorities (2020)."

"CPO 6.28 Apartments generally will only be permitted in settlements Levels 1 to 6 and in accordance with the location requirements set out in Section 2.4 of the Design Standards for new Apartments, Guidelines for Planning Authorities (2020). All apartment development should be served by high quality usable open space."

With regard to these requirements:

- The overall proposed development comprises 10.6% Part V housing, with 11% Part V within that part of the site falling within the jurisdiction of WCC only,
- The mix of uses proposed provides a mix of types and sizes to ensure a range of unit types is available to serve the needs of various households. The variety of units proposed will serve the needs of single occupiers, starter family homes, families downsizing, families upsizing, elderly persons, and disabled accessible units,
- Bray is a Level 1 settlement, with the application site is close to excellent public transport routes and accordingly suitable for apartment development.

4.2.2 Tenure Mix

The Draft Wicklow County Plan at section 6.3.1 notes that “sustainable communities require a variety of house types, sizes and tenures. It is important that new multi-unit residential development provides an appropriate mix that caters for a variety of household types and sizes”.

As noted at **section 4.1.2** above, the mix of private development proposed is capable of delivering different tenure options in the future, as it offers various housing formats which would be suitable for the private rental market as well as owner occupiers. This is the case both for proposed houses and apartments.

4.3 Bray Municipal District Local Area Plan 2018 – 2024

The Bray LAP sets out an overall strategy for the planning and sustainable development of Bray. Future development of the subject lands is governed by the Bray LAP which sets out planning policies and objectives, as well as design standards for the administrative area.

The Bray LAP advocates a suitable mix of housing types in new residential areas to meet the needs of residents. With specific regard to housing mix the Bray LAP states:

R14 “A full range of unit sizes, including smaller 2 and 3 bedroomed units shall be provided in all new housing developments (i.e. developments exceeding 4 units). Generally, no more than 50% of the units in any new development shall exceed 3 bedrooms or 120sqm in size.”

A range of unit types / sizes is proposed as detailed in **Section 2**. This includes 2 and 3-bedroom units of different sizes and types. The overall proposed development includes 3 and 4-bedroom units making up 18.8% of total units.

Of the proposed units within the Bray Municipal District (jurisdiction of WCC) only, there is again a mix of 2 and 3-bedroom sizes and types proposed (including apartments, duplex units and houses) with 14% 3-bedroom units in total.

The proposed unit mix is considered to comply fully within the guidance provided in Bray LAP.

4.4 Dún Laoghaire-Rathdown Development Plan 2022-2028

4.4.1 Housing Type and Mix

The DLR County Plan sets out an overall strategy for the planning and sustainable development of the areas within the jurisdiction of DLRCC. Future development of the subject lands is governed by the Development Plan which sets out planning policies and objectives, as well as design standards for the administrative area.

The plan contains a Housing Strategy and HNDA at Appendix 2. This sets out the following provision:

“Based on the analysis in this HNDA it is recommended that policy in the Plan require planning applications for residential schemes over a certain threshold (see table 9.1) in both new growth areas and within more mature suburban areas to include the following:

- *Details of existing and permitted unit types within a 10-minute walk of the proposed development.*
- *A detailed breakdown of the proposed unit type and size including a percentage split between 1/2/3+ bed units which in the case of apartments (and duplexes) shall generally be in accordance with Table 9.1.*
- *A site and/or floor plans that clearly identify proposed units that:*
 - *Are designed and located having regard to the needs of older people and/or persons with a disability.*

- Are designed having regard to the concept of lifetime adaptable and/or multi-generational homes.
- A statement outlining how the scheme has been designed for the needs of older people/ or persons with a disability and/or lifetime homes.”

These requirements are also set out in section 12.3.3 of the main Development Plan.

The details of existing and permitted uses within a 10-minute walk of the proposed development are set out in **Section 6** below. Proposals for how the development addresses the needs of older people and / or persons with a disability are presented in **Section 2** above. The breakdown of unit type and size is discussed further hereunder.

The HNDA recommends that planning applications for residential schemes over a certain threshold in both new growth areas and within more mature suburban areas to include a percentage split between 1/2/3+ bedroom units which in the case of apartments (and duplexes) shall generally be in accordance with Table 9.1 of the HNDA. The subject development is within Bray, a designated Key Town and a built-up area.

The unit mix split identified in Table 9.1 of the HNDA is presented in Table 12.1 of Chapter 12 of the Development Plan. Section 12.3.3 of the plan requires that,

“A detailed breakdown of the proposed unit type and size including a percentage split between 1/2/3+ bed units which in the case of apartments (and duplexes) shall generally be in accordance with Table 12.1”.

Table 12.1 presents unit mix requirements for apartment developments in different area types within the county. The subject site falls within an ‘existing built up area’, with the provisions for same as identified in Table 12.1 of the plan presented in **Table 4-1** below.

Table 4-1: Apartment Mix Requirements for Existing Built Up Area extracted from Table 12.1 (page 237) of DLR County Plan 2022-2018

Area	Threshold	~Mix Studio/1/2 bed Requirement (Apartments and duplexes)	3+ bed Requirement (Apartments)
Existing Built up area	Schemes of 50+ units	Apartment Developments may include up to 80% studio, one and two bed units with no more than 30% of the overall development as a combination of one bed and studios and no more than 20% of the overall development as studios	Minimum 20% 3+ bedroom units

Source: Dún Laoghaire-Rathdown Development Plan 2022-2028

Section 12.3.3 of the plan also includes the following provisions with respect of unit mix:

- No more than 10% of the total number of units in any private residential development may comprise of 2-bedroom 3-person apartment types.
- In schemes of 50+ units, where a mixture of housing and apartments or a scheme comprising solely of houses is being provided on a site the housing offering must ensure a mixture that includes a proportion of housing units that are 3-bedrooms or less.
- Duplexes are considered to be apartments for the purposes of mix.

Section 12.3.3 also states that, *“the requirement for certain percentages of 3-bed units in apartments shall apply to Build to Rent developments to accord with mix on page 237”.* However, this part of the Development Plan is taken as not having come into effect in accordance with section 31(4) of the *Planning and Development Act 2000 as amended*. In this regard, it is noted that the Minister of State at the Department of the Housing, Local Government and Heritage, consequent to a recommendation made to him by the Office of the Planning Regulator under section 31AM(8) of the *Planning and Development Act 2000 (as amended)*, has notified DLRCC of his intention to issue a Direction to the *Dún Laoghaire-Rathdown County Development Plan 2022-2028*.

Chapter 4 of the plan contains general policy in respect of Housing Choice including Residential Mix:

Policy Objective PHP27 “It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Housing Need Demand Assessment (HNDA) and any future Regional HNDA.”

Policy Objective PHP28 “It is a Policy Objective to facilitate the provision of Build-to-Rent in suitable locations across the County and accord with the provisions of ‘Sustainable Urban Housing: Design Standards for New Apartments’, 2020 (and any amendment thereof). Proliferation of Built to rent should be avoided in any one area. As the HNDA does not support provision of shared accommodation there shall be a presumption against granting planning permission for shared accommodation/coliving development”

A range of unit types / sizes is proposed as detailed in **Section 2**. The proposed development includes 222 no. apartments and duplexes within DLRCC, made up of 99 no. 1-bedroom units (45%), 99 no. 2-bedroom units (45%), and 24 no. 3-bedroom units (11%).

Excluding the Build to Rent proposals (Block A) the proposed development includes 60 no. apartments and duplexes within DLRCC, made up of 20 no. 1-bedroom units (33%), 23 no. 2-bedroom units (38%) and 17 no. 3-bedroom units (28%). As required in section 12.3.3 this proposed mix is ‘generally in accordance with Table 12.1’. The 1-bedroom and 2-bedroom units combined is less than the general 80% maximum provision and the proportion of 3-bedroom units is above the 20% general minimum requirement. The proposed of 1-bedroom units only is 33% compared with the general maximum requirement of 30%. However, this deviation is not considered substantial, and it is submitted remains ‘*generally in accordance with Table 12.11*’.

In the event however, that the Board consider the proposed number of one bed apartment units (non-BTR) within the DLR area to materially contravene the development plan, this is provided for in the *Statement of Material Contravention*.

Of the 52 no. houses within DLR, 11 no. (21%) are 2-bedroom houses.

The proposed development is located within Bray and proximate to a variety of existing housing typologies. The closest existing housing is located in Woodbrook Glen and along Corke Abbey in which there are c.510 no. 3 / 4-bedroom semi-detached units. To the south of the subject site within Bray town centre there are a large no. of varied housing types and sizes.

4.4.2 Tenure Mix

As noted above, Chapter 4 of the DLR Development Plan contains policy in respect of Housing Choice. In addition to general housing mix the plan also advocates for the provision of a mix of tenure. As noted in **section 4.4.1** above, Policy Objective PHP27 seeks a variety of tenures to be provided throughout the County. **Section 4.3.2** also provides as follows with respect of tenure types:

“In order to mitigate against undue segregation of tenure type, new developments should avoid an over proliferation of a single housing tenure to accommodate the needs of a mixed and balanced community. In this regard, a developer shall be required to have regard to both the existing and permitted house types and tenures within the surrounding and adjoining neighbourhoods and/or district and clearly demonstrate how their proposed development will add to the housing mix of the area.”

Policy PHP28 noted above is one particular policy objective presented to support the increase of tenure mix and choice.

The Development Plan provides that,

“Build-to-rent (BTR) accommodation will be facilitated at appropriate locations across the County in accordance with land use zoning objectives. For the avoidance of doubt, BTR is:

UNIT MIX REPORT

- *permitted in principle in areas zoned objective MTC (major town centre) and DC (district centre)*
- *open for consideration in areas zoned objective NC (subject to retaining an appropriate mix of uses), A, A1, and A2.”*

The proposed Block A is located on land zoned A which means that BTR is open for consideration on this site.

5 POPULATION DEMOGRAPHICS

As stated in the NPF “our population is changing rapidly, with average households becoming both smaller in size and older as an increasing number of people live independently in their later years.” (page 93)

According to the latest Central Statistics Office (CSO) Census of Population (2022) preliminary data, County Wicklow has a total population of 155,485 persons in 2022 compared with a 2016 population of 142,425. This equates to a 9.2% population growth. Equivalent data is not yet available for DLR, but it is noted that the overall population of the entirety of County Dublin grew by 7.7% to 1,450,701 persons compared with a 2016 population of 1,347,359 persons.

The preliminary results of the 2022 Census of Population reveal that the national population growth rate for the 2016 – 2022 period was 7.6%. Counties with the strongest growth rates in the country included a number of counties in close proximity to Co. Dublin; Co. Meath (12.9%), Co. Kildare (11%), Co. Wicklow (9.2%) and Co. Wexford (9.2%).

5.1 Population Age Structure

The age profile of the population at the State, DLR and County Wicklow in 2011 and 2016 are shown in **Table 5-1**. This table shows that the proportion of 0-14-year olds increased in DLR, but dropped in County Wicklow and across the State as a whole over this period. The 15-24-year-old age cohort showed an overall decrease of population throughout the State, DLR and County Wicklow. The 25-44 age cohorts for DLR, County Wicklow and the State also experienced a drop in population with a decrease of 2.1%, 1.3% and 2.6% in these areas respectively. The 65+ age group experienced an increase in population nationally and in County Wicklow and was unchanged in DLR.

Table 5-1: Population Structure by Age

Population Structure 2011 & 2016					
Area /Age	0 – 14 (%)	15 – 24 (%)	25-44 (%)	45-64 (%)	65+ (%)
State 2011	21.3	12.6	31.6	22.7	11.7
State 2016	21.1	12.1	29.5	23.8	13.4
Change	-0.2%	-0.5%	-2.1%	+1.1%	+1.7%
Wicklow 2011	22.8	12.1	30.5	23.7	11.0
Wicklow 2016	22.7	11.4	27.9	25.0	13.0
Change	-0.1%	-0.7%	-2.6%	+1.3%	+2.0%
DLR 2011	18.2	14.0	29.5	23.9	14.5
DLR 2016	18.4	13.7	28.2	23.9	15.9
Change	+0.2%	-0.3%	-1.3%	-	+1.4%

Source: CSO

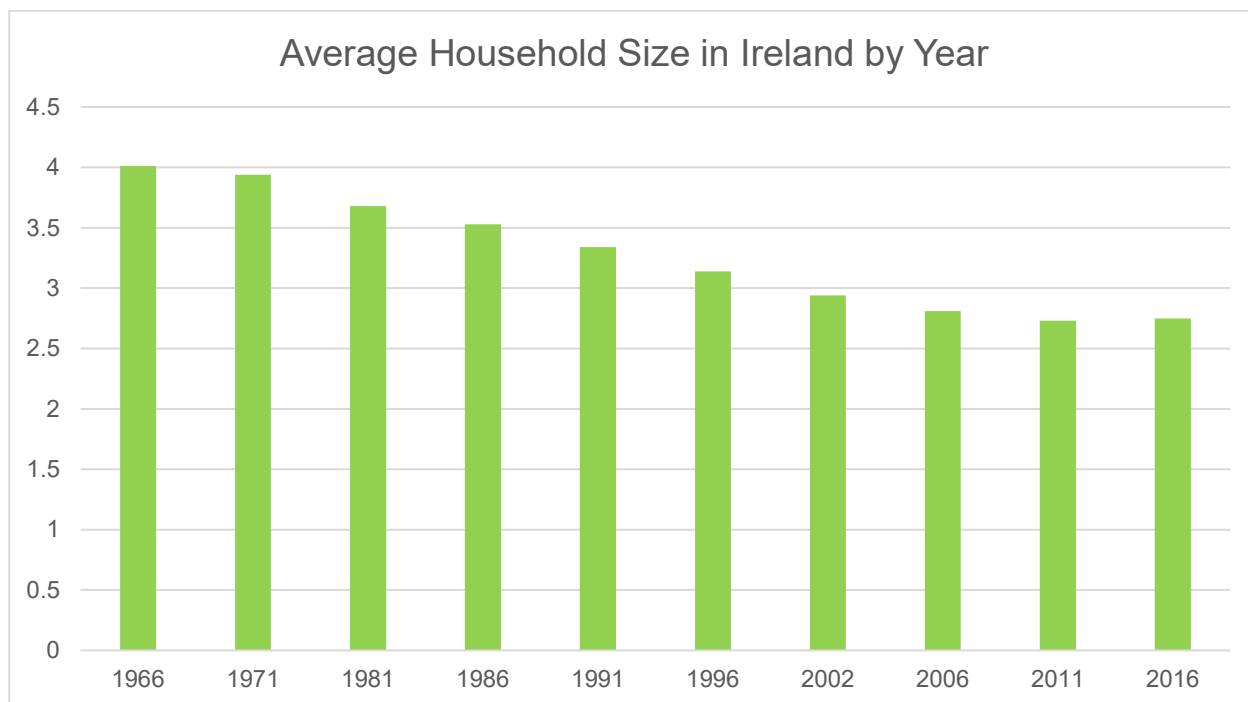
The data indicates that while the population of the State, Wicklow and DLR has been growing, this growth has been most pronounced in the older cohorts. This accords with data on life expectancy and points to a particular need in the future for units suitable for the elderly typically with single or two person occupancy. Apartments by virtue of their smaller size, single floorplate and reduced maintenance and upkeep requirements can be particularly suitable for older people.

It can be expected that subject to a reasonable economic environment the current 15–24 cohort will in the coming years be desirous of starter homes in the locality.

5.2 Households and Housing

Census data shows there has been a steady decline in household size within Ireland from 1966 to 2011 (See **Figure 5-1**). The average household size in Ireland remains somewhat above the EU and UK averages. The marginal increase in household size recorded in 2016 is widely attributed to scarcity of supply rather than a long term reversal of an underlying trend.

Figure 5-1: Average Household Size - Ireland



Source: CSO

Table 5-2 provides a summary of all household sizes in Wicklow and DLR in 2016.

Table 5-2: Size of Household in Wicklow and DLR in 2016

Size of Household in 2016:	Number of Households in 2016:		Number of Persons in 2016	
	Wicklow	DLR	Wicklow	DLR
1 Persons	9,919	17,576	9,919	17,576
2 Persons	13,680	24,164	27,360	43,328
3 Persons	9,132	13,784	27,396	41,352
4 Persons	9,327	13,150	37,308	52,600
5 Persons	4,865	7,018	24,325	35,090
6 Persons or more	1,656	2,172	9,936	13,032
7 Persons	430	527	3,010	3,689
8 Persons or more	202	210	1,724	1,801
Total	49,211	78,601	140,978	213,468

Source: CSO

Table 5-2 shows that 23,599 of 49,211 households in County Wicklow (48%) comprise 1 or 2 people. In DLR 41,740 of 78,601 households (53%) comprise 1 or 2 people. Cumulatively within the two counties 51% of households are 1 or 2 person households.

Preliminary data from the 2022 census shows the population of Wicklow and Dublin have increase by 9.2% and 7.7% respectively in the period 2016 – 2022. The increase in housing stock for the two counties in the period is 9.3% and 7% respectively.

CSO data on housing type is collated in **Table 5-3**. This shows that a large portion of existing housing stock within the two counties is made up of detached and semi-detached houses.

Table 5-3: Private Housing By Type

Private Housing by Type											
	Detached House		Semi-detached House		Terraced House		Flat / Apt		Bed Sit		
	Total	%	Total	%	Total	%	Total	%	Total	%	
State 2011	699,869	43	465,651	29	281,825	17	177,587	11	5,695	3	1,630,627
State 2016	715,133	43	471,948	28	284,569	17	200,879	12	3,266	2	1,675,795
Change	+15,264		+6,297		+2,744		+23,292		-2,429		+45,168
Wicklow 2011	21,290	45	13,959	29	7,678	16	3,851	8	74	1	46,852
Wicklow 2016	22,110	46	14,326	29	7,778	16	4,170	8	66	1	48,450
Change	+820		+367		+110		+319		-8		+1,608
DLR 2011	16,598	22	30,236	41	12,969	17	14,747	20	136	2	74,686
DLR 2016	16,686	21	30,769	39	13,288	17	17,229	22	88	1	78,060
Change	+88		+533		+319		+2,482		-48		+3,374

Source: CSO – E1002 Private Households 2011 to 2016

Table 5-3 shows that within DLR and Wicklow respectively over 77% and 91% of units are houses. It can be reasonably assumed that of the order of three quarters of houses are at least 3-bedroom units and that some apartments are also 3-bedroom units. Therefore over 56% and 68% of units within DLR and Wicklow respectively are estimated to have 3+ bedrooms.

The need for all types of housing in the State and within counties Wicklow and DLR is well understood. An analysis of population and housing data within the counties indicates that there is a particular requirement for 1-bedroom and 2-bedroom units to cater for the existing household size profile and the projected continuing decline in average household size.

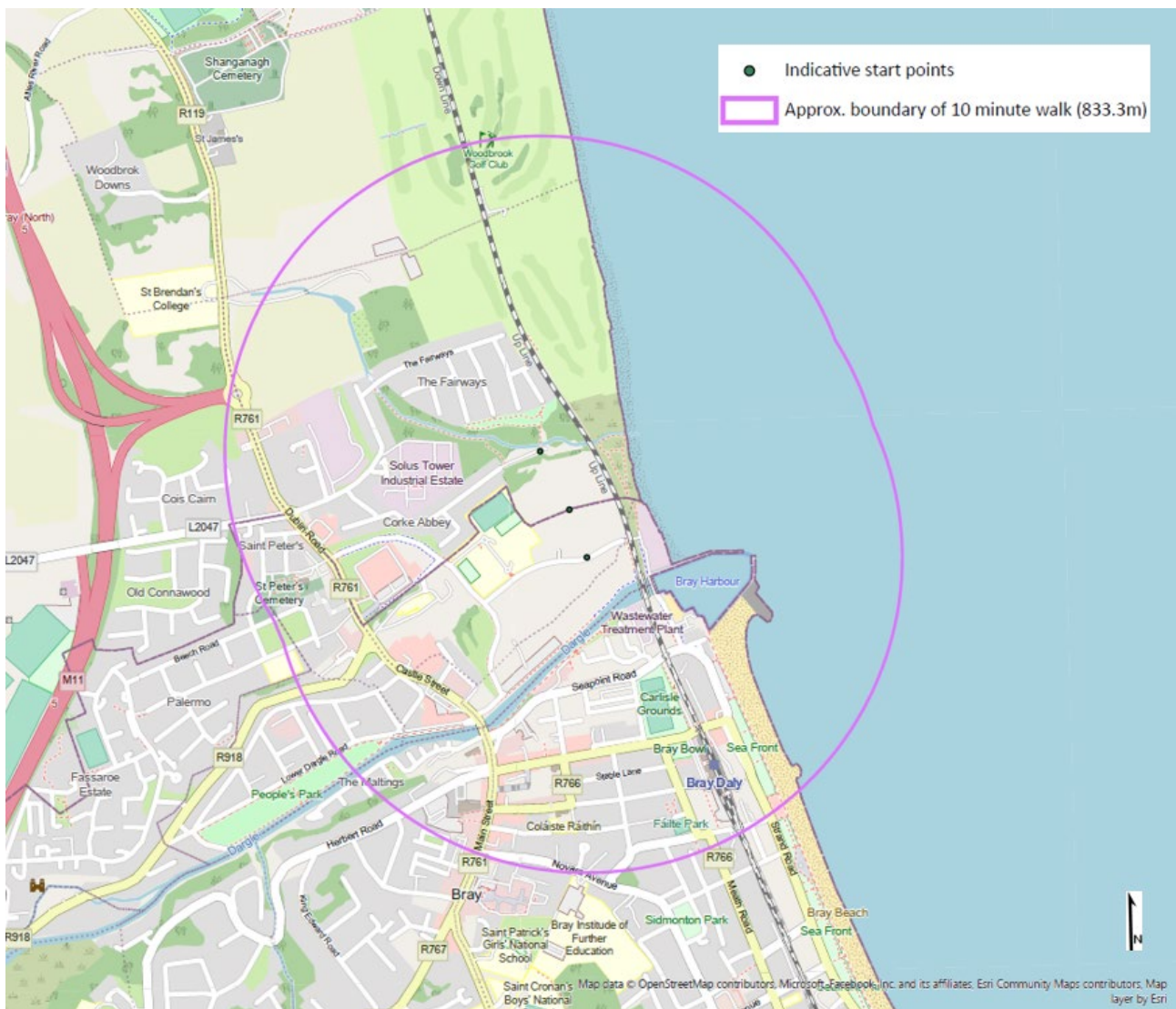
6 LOCAL SITE CONTEXT

6.1 Existing and Permitted Housing Stock

In order to inform and assess the unit mix and tenure mix which is suitable at the subject lands, in addition to reviewing local planning policy and demographics, it is also appropriate to review the existing residential provision within the vicinity of the site. As noted at **section 4.4.1** above, the DLR County Plan requires that planning applications for larger residential schemes include amongst other items, details of existing and permitted unit types within a 10-minute walk of the proposed development.

Figure 6-1 below identifies an area of approximate 10-minute walking distance from the application site.

Figure 6-1: 10-minute walking catchment from Application Site



Source: Based on OpenStreetMap (CYAL50252391 © Ordnance Survey Ireland/Government of Ireland.)

The subject site is located within the built-up area of Bray, close to the town centre. Accordingly, it is surrounded largely by long established development. The existing residential provision in the area comprises primarily of houses of various age, size and tenure. It includes a range of 2, 3 and 4+ bedroom private houses including detached, semi-detached and terraced. Within the catchment also are a number of areas of mature housing originally constructed as local authority housing. These are largely 2 and 3-bedroom units and generally terraced houses. Given the age of these dwellings it is likely that many of these are now in private ownership.

UNIT MIX REPORT

While the existing residential stock is very much dominated by houses, there is some existing apartment provision within the 10-minute walking catchment. These are mainly provided within modestly scaled low level blocks. On the basis of the age and design of these blocks it is assumed that they generally comprise a mix of 1, 2 and 3 bedroom units.

There are no existing recently constructed large multi storey apartment buildings within the local area. Planning permission was recently granted by An Bord Pleanála to Aeval Unlimited Company for a SHD at Corke Little, Woodbrook for development of 685 no. units, of which 63% approx. (430 no. units) were apartment and 7% (48 no. duplex units). The remaining 30% are housing. The apartments permitted are within 4 no. blocks. 10.5% of the units are to be delivered as Part V social housing. The remainder of the units will be private development.

Table 6-1 below contains a list of the existing and permitted residential uses within this catchment. It includes a brief description of the unit types, general mix and tenure.

Table 6-1: Existing and Permitted Residential Uses within 10-minute Walking Catchment by Housing Type, Mix and Tenure

Existing Residential Uses within Local Area			
Residential Area	General Housing Type	General Housing Mix	General Tenure Type
Woodbrook Glen (The Fairways, The Lawn, The Glen)	Semi-detached houses	3 / 4-bedroom units	Private
Dublin Road (eastern side north of Corke Abbey)	Large detached and semi-detached houses	4+-bedroom units	Private
Corke Abbey Area	Semi-detached houses	3 / 4-bedroom units	Private
St. Peter's Terrace, Dublin Road and St. Peters Road	Terraced houses	3-bedroom units	Local Authority / Private
Roseville Court (Dublin Road)	Duplex / Apartments	2, 3 and 4-bed units	Private
Ledwidge Crescent (part)	Terraced houses	3-bedroom units	Local Authority / Private
Sunnybank Court	Apartment Block	2-bedroom units	Private
St. Patricks Square	Terraced Houses	2- bedroom units	Local Authority
St. Cronan's Road, St. Collumcill'e Terrace, St. Laurence's Terrace,	Terraced houses	2 / 3-bedroom houses	Local Authority
Brabazon Cottages	Terraced houses	2-bedroom units	Private
The Printworks	Terraced Houses and Apartments	2/3-bedroom units	Private
The Maltings	Apartments & semi-detached houses	1, 2 and 3-bedroom units	Private
Seapoint Road & Court, Galtrim Park,	Detached, semi-detached and some terraced houses	Largely 3 / 4+ plus some 1 / 2-bedroom units	Private
Duncairn Avenue, Duncairn Terrace	Terraced Houses	3 / 4-bedroom houses	Private
Quinsborough Road, Wyndham Park, Stable Lane, Florence Road	Terraced Houses	Largely 3 / 4+-bedroom houses with some 2 / 3-bedroom mews units	Private
Strand Road, Royal Marine Park	Detached and Semi-Detached Houses	4+-bedroom units	Private
Permitted Residential Uses within Local Area			
Residential Area Name	General Housing Type	General Housing Mix	General Tenure Type
Corke Little, Woodbrook, Shankill (permitted under ABP30584419)	Apartment Blocks (approx. 63%), duplex types (approx. 7%) ,and detached, semi-detached and terraced houses (approx. 30%).	Apartments predominantly 1 / 2-bedroom units; duplex types 2/3- bedroom units; houses 3 / 4 and 5-bedroom units.	Predominantly private with 10.5% Part V social

Source: RPS

UNIT MIX REPORT

Based on the foregoing the following are key summary points in respect of the existing housing type and tenure mixes within the local vicinity of the application site:

- Application site lies within an existing built-up area comprising mature established residential areas dominated by houses of various size and age.
- Existing apartment provision within the area comprises a very small proportion of the existing housing stock.
- There is a mix of private and social / local authority housing within the area. The existing housing stock originally constructed as local authority housing is mature and likely that much of this stock is now in private ownership.
- The existing private housing stock within the area is largely of 3 / 4+-bedroom size units. The existing local authority / social housing is largely 2 / 3-bedroom size units.
- Given the nature of the existing housing stock within the area, it is likely that the private rental market within the area is operated largely by independent private landlords with small property portfolios.
- There is only one permitted development within the area comprising multi-unit apartment buildings.
- There is no existing or permitted Build to Rent apartment development within the area.

Further to a review of the house types on the ground, the housing data available from the 2016 Census was also examined. The area examined is illustrated on **Figure 6-2** below.

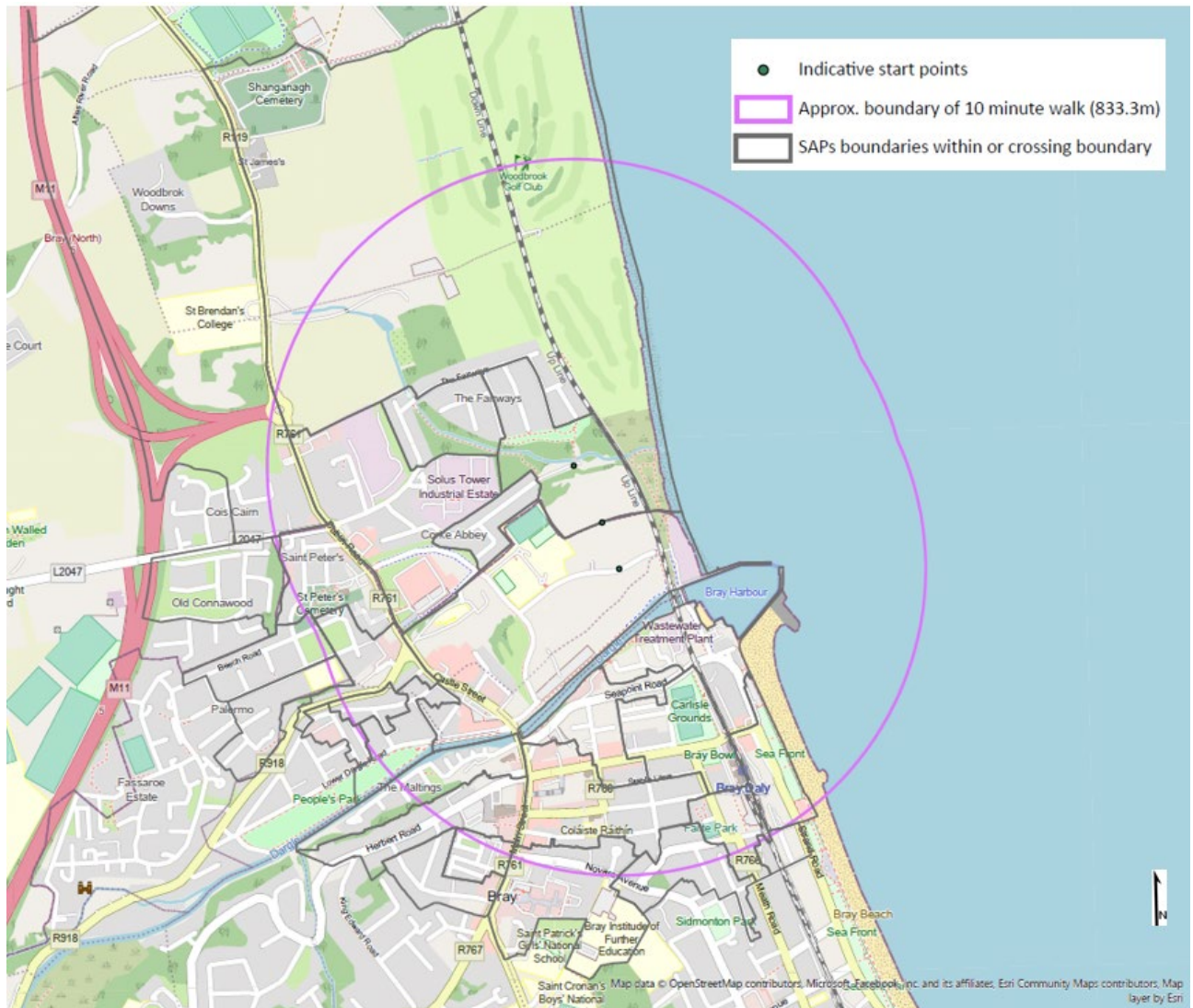
Table 6-2 shows that 1,544 of 2,874 households within 10-minutes of the site (54%) comprise 1 or 2 people.

Table 6-2: Size of Household

Size of Household in 2016	Number of Households in 2016			Number of Persons in 2016		
	Wicklow	DLR	Total	Wicklow	DLR	Total
1 Persons	673	126	799	673	126	799
2 Persons	569	176	745	1,138	352	1,490
3 Persons	362	197	559	1,086	591	1,677
4 Persons	266	191	457	1,064	764	1,828
5 Persons	119	90	209	595	450	1,045
6 Persons or more	33	30	63	198	180	378
7 Persons	15	9	24	105	63	168
8 Persons or more	11	7	18	92	59	151
Total	2,048	826	2,874	4951	2,585	7,536

Source: CSO

Figure 6-2: 10-minute walking catchment from Application Site



Source: Based on OpenStreetMap and CSO 2016 - Small Area Statistics (CYAL50252391 © Ordnance Survey Ireland/Government of Ireland.)

CSO data on housing type is collated in **Table 6-3**. This shows that a large portion of existing housing stock (75%) within 10-minutes of the site is made up of House/Bungalow units, while 22% comprises of Flat/Apartment units.

Table 6-3: Private Housing by Type

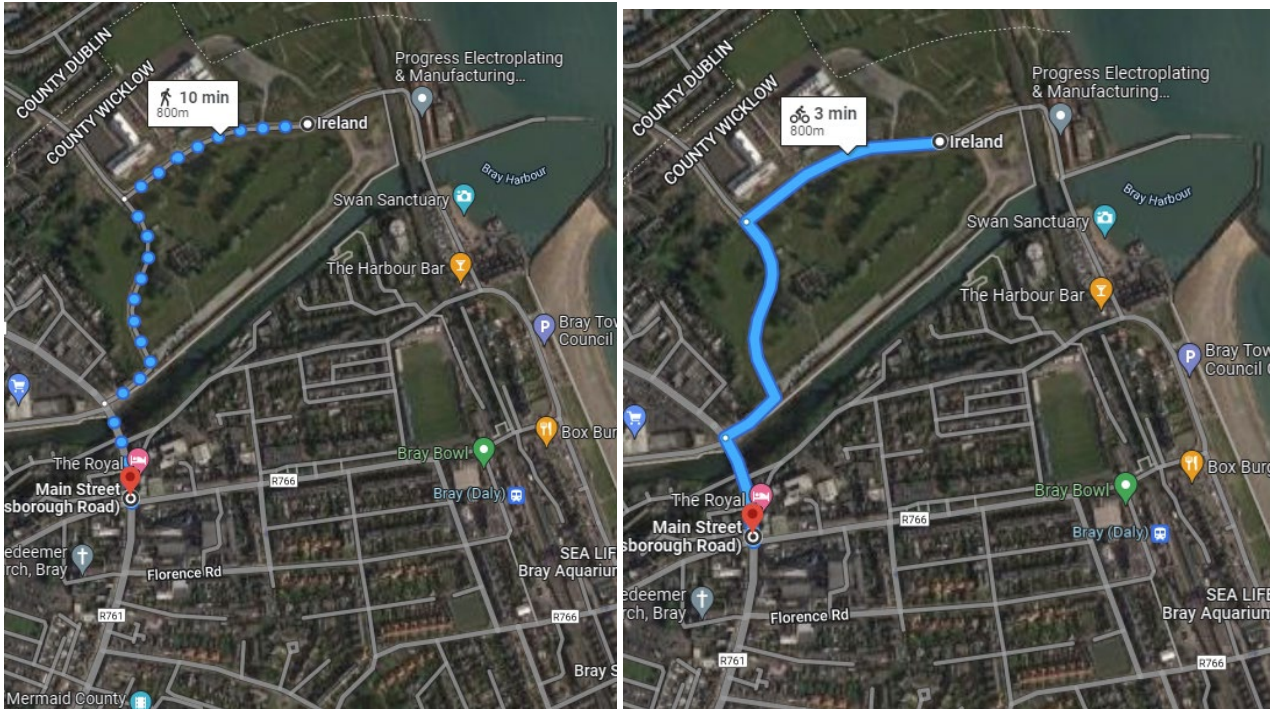
Private Housing by Type 2016	Number of Households in 2016			Number of Persons in 2016		
	Wicklow	DLR	Total	Wicklow	DLR	Total
House/Bungalow	1,402	758	2,160	3,591	2,406	5,997
Flat/Apartment	581	65	646	1,224	170	1,394
Bed-Sit	25	1	26	36	1	37
Caravan/Mobile home	0	0	0	0	0	0
Not stated	40	2	42	100	8	108
Total	2,048	826	2,874	4,951	2,585	7,536

Source: CSO

6.2 Site Context - Accessibility and Connectivity

The subject site is located in close proximity to Bray town centre with easy access to all of its existing services and amenities. It is only approx. 600m from Main Street as the crow flies. The walking and cycling distance to the start of Main Street is approx.800m, which is the equivalent to a 10-minute walk or a 3-minute cycle only (see **Figure 6-3** below).

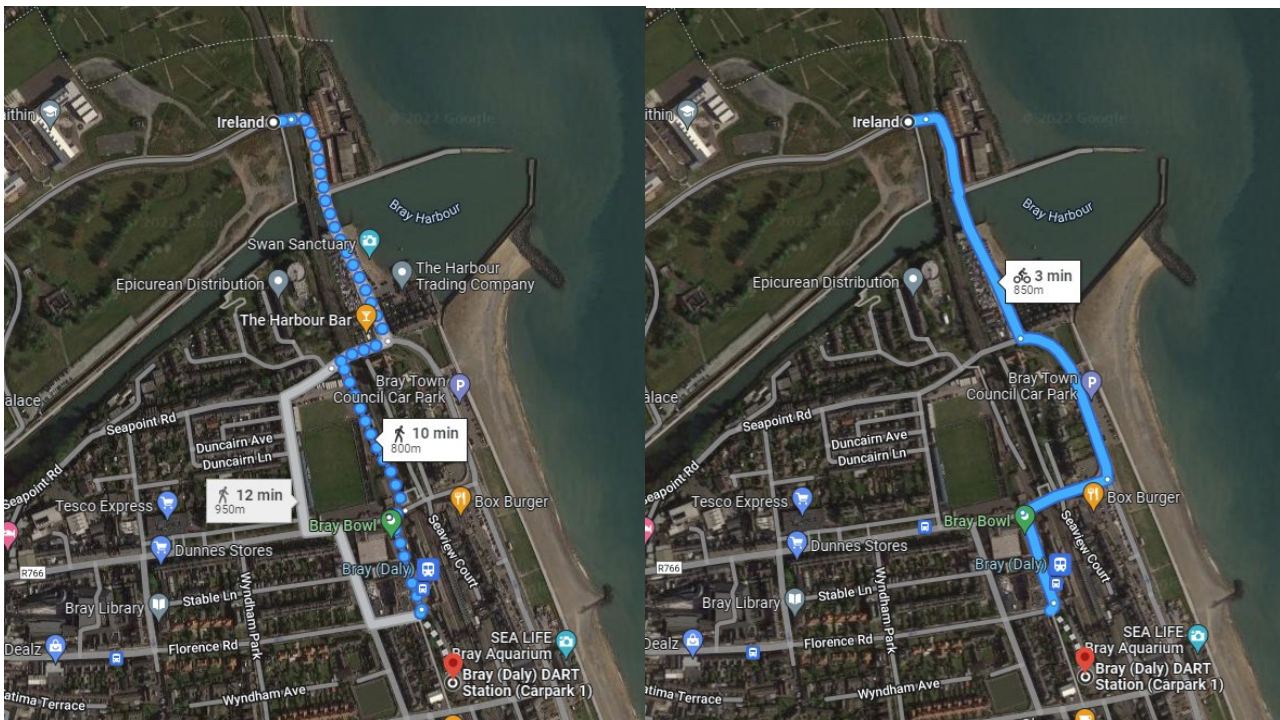
Figure 6-3: Walking and Cycle Distances and Travel Times to Bray Town Centre



Source: Googlemaps

The site is approximately only 700m from Bray DART Station. Given the existing walkway connection beneath the railway line at the southwestern boundary of the site, there is an existing direct pedestrian and cycle connection available to the DART station along Harbour Road, Strand Road and Quinsborough Road. The travel distance from the site to the DART station is approx. 800m which is the equivalent to a 10minute walk or a 3-minute cycle (see **Figure 6-4** below). Bus services will also be available at the DART station, though bus routes running along the Dublin Road will be more directly accessed there from the application site. There are also plans for Luas services to be provided close to and serving the site.

Figure 6-4: Walking and Cycle Distances and Travel Times to Bray DART Station



Source: Googlemaps

7 ASSESSMENT OF HOUSING MIX AND TENURE

7.1 Suitability of Overall Residential Type and Unit Mix

The proposed development comprises a wide mix of housing types and sizes including apartments, duplexes and houses ranging from 1–4 bedrooms as detailed in **Table 7-1**.

Table 7-1: Proposed Overall Residential Unit Mix

Proposed Overall Residential Unit Mix		
House Type	No. of Units	% of Development
1-bedroom	238	40.5%
2-bedroom	238	40.5%
3-bedroom+	110	19%
Total	586	100%

Source: Glenn Howells Architects Schedules

The density of development is considered to accord with planning policy and the location of the subject site proximate to existing DART and bus services and adjacent to the planned future Luas line. Such a density of development requires unit types to include apartments / duplexes. Apartments have historically been under provided within Irish town and cities and offer particular advantages for those wishing to downsize or minimise their building maintenance requirements. The proposed unit mix by house type is detailed in **Table 7-2**.

Table 7-2: Proposed Residential Unit Mix by Type

Proposed Overall Residential Unit Mix			
Apartment Type	No. of Units	% of Development	% of Apartments (incl. duplex)
1-bedroom	238	41%	47%
2-bedroom	199	34%	39%
3-bedroom	21	4%	4%
Total	458 Apts	78%	90%
Duplex Type			
2-bedroom	26	4%	5%
3-bedroom	26	4%	5%
Total	52 Duplex	9%	10%
Total Apartments	510	87%	100%
House Type			
2-bedroom	13	2%	
3-bedroom	51	9%	
4-bedroom	12	2%	
Total	76 Houses	13%	
Overall Total Units	586	100%	100%

Source: Glenn Howells Architects Schedules

Given the existing housing type within County Wicklow and DLR the proposed development comprising 78% apartments is considered appropriate.

At a more local level, as detailed in **section 6.1** above, the existing housing stock in the immediate walking catchment of the application comprises primarily of houses including a large amount of mature housing stock. The provision of high quality apartments at a location in such close proximity to the centre of Bray town and enjoying sea views represents a welcome widening of options for the people of the area. The housing type and mix will be particularly attractive to the growing 65+ cohort and to a younger cohort forming a first household. The Build to Rent apartment provision in Block A will be particularly attractive to the

younger cohort while the standard apartment provision within Blocks B, C and D will present a range of apartment sizes and styles for a wide range of population including owner occupier first time buyers, smaller families and older persons trading down to smaller dwellings.

As outlined in **Section 5** there is a particular requirement for 1- and 2-bedroom units to cater for the existing household size profile and the projected continuing decline in average household size. The provision of 1- and 2-bedroom apartments, duplex units and houses is acutely needed in County Wicklow and DLR. This demand is particularly supported by the unit mix requirements set out in the DLR County Plan for built up areas, which mix was proposed in the housing Strategy further to a HNDA having been undertaken for the county.

The proposed provision of 476 no. 1 and 2-bedroom units will provide some of the necessary re-orienting of housing stock to better meet existing and future housing need.

7.2 Compliance with Quantitative Standards

Neither the DLR County Plan nor the Wicklow County Plan include qualitative standards for general residential type or unit mix. The DLR County Plan however does set out standards for apartment development (including duplex units). Apartment size and mix requirements within WCC are subject only of the mix provisions set out in the Apartments Standards *SPPR1*.

Table 7-3 below presents a quantitative assessment of the apartment proposals only (including duplex), excluding the BTR Block A. It assesses the apartments within the DLR part of the site against the provisions of the DLR County Plan and those within the Wicklow County area against the provisions of SPPR 1 of the Apartments Standards.

Table 7-3: Quantitative Assessment of Apartment Size Mix

Apartment Unit Size	Apartment Development within DLR County Area		Apartment Development within Wicklow County Area		Overall Proposed Apartment Development excluding BTR	
	Proposed Excl. Build to Rent	Development Plan Requirement Excl. BTR	Proposed	Design Standards for new Apartments	Proposed	Design Standards for new Apartments
1 Bedroom	20 No. / 33%	No more than 30% one bed and studios	139 No. / 48%	Up to 50% one bedroom or studio	159 No. / 46%	Up to 50% one bedroom or studio
2 Bedroom	23 No. / 38%		126 No. / 44%		149 No. / 43%	
1 & 2 Bedroom combined	43 No. / 72%	Up to 80%	265 No. / 92%		308 No. / 89%	
3+ Bedroom	17 No. / 28%	Minimum 20%	23 No. / 8%	No minimum requirement	40 No. / 11%	
	60 No		288No.		348No.	

Source: RPS

The proposed unit mix of all apartments (excluding BTR and including duplex) across the entire site is in accordance with the requirements of SPPR1 of the Apartments Standards . That element within the area of WCC only, is also in accordance with these requirements. The unit mix of apartments (excluding BTR) within DLR in generally in accordance with the requirements of Table 12.1 of the DLR County Plan. Table 12.1 proposes that no more than 30% 1-bedroom units and studios be provided in a scheme. The proportion of 1-bedroom apartments proposed in the DLR part of the site is 33%. The difference between the 33% proposed and 30% would be 2 no. units only. It is not considered that this represents a material deviation from the provisions of Table 12.1 and accordingly that it is “*generally in accordance with Table 12.1*” as required under section 12.3.3 of the Development Plan (see **section 4.4.1** of this report above).

In the event however, that the Board consider the proposed number of one bed apartment units (non-BTR) within the DLR area to materially contravene the development plan, this is provided for in the *Statement of Material Contravention*.

7.3 Tenure Mix and Type

Table 2.6 in section 2 sets out the total numbers of units proposed by apartment type and tenure. Table 7-4 below presents these proposals as percentage figures of the overall total units.

Table 7-4: Proposed Overall Residential Unit Mix by Type and Tenure

Proposed Overall Residential Unit Mix				
Apartment Type	Proportion of Overall Units by Tenure and type			Proportion by Type only (all tenures combined)
	Part V	Private Development	Build to Rent	
1-bedroom	6.83%	20.31%	13.48%	40.79%
2-bedroom	3.41%	17.58%	12.97%	33.79%
3-bedroom	-	2.39%	1.19%	3.58%
Sub-Total	10.24%	40.28%	27.64%	78.16%
Duplex Type	-			
2-bedroom	0.17%	4.26	-	4.43%
3-bedroom	0.17%	4.27	-	4.44%
Sub-Total	0.34%	8.53%		8.87%
House Type				
2-bedroom	-	2.22%	-	2.22%
3-bedroom	-	8.7%	-	8.70%
4-bedroom	-	2.05	-	2.05%
Sub-Total	0	12.97		12.97%
Total Tenure Percentages	10.6%	61.8%	27.6%	100%

Source: Glenn Howells Architects

This variety of tenure proposed is considered a suitable response in the particular site context. As set out in section 6.1 the local context of the site comprises a mix of private housing and local authority social housing. Much of the local authority housing stock is mature houses. The proposed Part V apartment units would add to the mix of local authority housing types within the area. While the proposed Build to Rent element of the scheme adds to the overall tenure mix in the area, it remains a restricted proportion of the overall scheme such that an appropriate balance of private, rental and social housing overall is achieved.

7.4 Suitability of site for Build to Rent

The site is also strategically located close to the town centre and to a range of public transport connections. Proximity to the town centre means the development would be a suitable location for many workers employed within the town. The proximity to the public transport connections means the development will offer a sustainable living location for persons commuting to Dublin City Centre and other parts of the wider Greater Dublin Area.

The Apartments Standards include only brief commentary on the type of locations that are suitable for Build to Rent apartment. This commentary is made in the context of car parking provision in part (iii) of SPPR8 which notes that “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”. As set out in previous sections of this report, in particular section 6.2, the site is both centrally located and proximate to public transport services.

The DLR County Plan provides that BTR is open for consideration on 'A' zoned lands which the site of Block A is zoned. Given the existing and permitted housing and tenure within the local vicinity of the site, it is considered appropriate that some BTR be provided at Coastal Quarter to enhance tenure choice within this central location of Bray town. There are only 4 no. existing apartment developments (Roseville Court, Sunnybank Court, The Printworks and The Malting) identified within the immediate catchment of the subject site, of which none are large scale multistorey apartment buildings. While there is large scale apartment development permitted at Woodbrook to the north of the application site, none of these are Build to Rent. On the basis of the existing and permitted stock it is reasonable to assume that the rental market within the immediate vicinity is operated largely by independent private landlords with small property portfolios. The delivery of specific Build to Rent accommodation will widen and enhance the range of options available to renters.

7.5 Suitability of Proposed Resident Facilities and Amenities within BTR Block A

The Apartments Standards require that *"the developer will be required to provide an evidence basis that the proposed facilities are appropriate to the intended rental market"*.

Block A which is proposed as BTR comprises a range of on-site support services and communal residential amenities for the future residents. The residential amenity space provided (545sq.m.) will comprise of a resident's gym and residents' lounges that will accommodate social/recreational areas, work zones and management facilities and a storage area for bulky goods in addition to the communal landscaped podium area. On-site support services to be provided comprise a concierge facility, a secure internal bicycle storage area (with space for bike repair and cleaning activities) and waste storage and management.

Furthermore, it should be noted that the apartments within Block A are to be constructed in accordance with regular apartment standards under the Apartments Standards. SPPR8 of the Apartments Standards makes provisions for a relaxation of certain apartment design standards for BTR, including requirements for internal apartment storage space, private amenity space, the requirement for the majority of units to exceed the minimum floor area standards and the restriction on the number of apartments per floor per core. The proposed development however does not seek to avail of any these relaxations of standards within Block A. The apartments within Block A therefore will individually achieve a high level of private residential amenity directly attached to the individual units. This will be significantly enhanced with the various communal amenities and services noted above.

8 CONCLUSIONS

As stated in the NPF with regard to increasing housing demand “*between 2018 – 2040 an average output of at least 25,000 new homes will need to be provided in Ireland every year to meet people’s needs for well-located and affordable housing, with **increasing demand to cater for one- and two-person households (our emphasis)***” (page 94). It is evident that apartments shall play a growing role in addressing housing need, particularly within the Dublin Metropolitan Area. As shown in **Table 5-3**, apartments account for 12% of all occupied households in Ireland and 20% of occupied households in the DLRCC area and 8% in the WCC area in 2016 (*Census Statistics Office*). An analysis of population and housing data within the counties indicates that there is a particular requirement for 1-bedroom and 2-bedroom units to cater for the existing household size profile and the projected continuing decline in average household size.

The proposed development has been designed with consideration for the age profile and trends in household composition of DLR and County Wicklow. Considering the population change, average household size and the local context of the site, it is envisaged that this development will experience a strong demand particularly due to its location on an existing DART line, a planned Luas Line and bus services which are to be enhanced.

The Apartment Standards state that “*in the context of sustainably increasing housing supply, targeting a greater proportion of urban housing development and matching to the type of housing required, there is a need for greater flexibility*” (page 8). This promotes the need for urban housing that matches the type of housing required. Analysing the population of DLR and County Wicklow, it is evident that a greater proportion of 2-bedroom units are needed to match the area’s household profile and the projected decrease in average household size.

The proposed unit mix is considered to comply fully with the guidance provided in the Wicklow County Plan and the Bray LAP.

The range of housing typologies proposed, and the associated mix of unit sizes is also consistent with the DLR County Plan in all aspects apart from the provision of in excess of a slight excess of 1-bedroom apartment units compared with the provisions of Table 12.1. As this deviation equates to 2 No. units only it is not considered a material deviation and the proposal is generally in accordance with the requirements of Table 12.1.

The scheme comprises of private, rental and social housing. The overall mix of tenure types is considered a suitable response at this location given the existing tenure mix and housing type and age within the local context of the site.

Taking all the above points into consideration we submit to An Bord Pleanála that the proposed development will deliver 586 no. units is in line with *NPF 2040* and plays an important role towards contributing to the delivery of at least 25,000 new homes per annum in Ireland. The proposed development is comprised of a mix of housing types and sizes and a mix of tenure types. This mix is well matched to cater for the existing and projected population of DLR and County Wicklow and is consistent with national guidelines and is in accordance with national, regional and county policy regarding housing and tenure mix.