

Build to Rent Justification Report

In respect of

**St. Vincent's Hospital Fairview Redevelopment
(LRD Planning Application)**

at

**St. Vincent's Hospital, Richmond Road and
Convent Avenue, Fairview, Dublin 3**

Prepared for

St. Vincent's Hospital Fairview

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March 2023

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DOCUMENT CONTROL SHEET

Client:	St. Vincent's Hospital Fairview
Project Title and Job No.:	St. Vincent's Hospital Fairview Redevelopment (LRD Planning Application)
Document Title:	BTR Justification Report
Document No:	FINAL

Rev.	Status	Author(s)	Reviewed By	Approved By	Issue Date
Final	Final	TD	PT	PT	30/03/2023

1.0 INTRODUCTION / EXECUTIVE SUMMARY

On behalf of the applicant, St. Vincent's Hospital Fairview, this Build to Rent (BTR) Justification Report is submitted in support of the proposed development, which includes 317 no. Build to Rent units, at St. Vincent's Hospital, Richmond Road and Convent Avenue, Fairview, Dublin 3. The application site includes an area of the public road / footpaths (extending for approximately 0.8km) to facilitate service connections via Griffith Court, Philipsburgh Avenue and Griffith Avenue, part of the open space within Grace Park Wood to facilitate a pedestrian / cycle connection, and part of Richmond Road to facilitate service connections and associated upgrades.

LRD Opinion and Policy QHSN40

This BTR Justification Report is submitted specifically in response to Policy QHSN40, and other relevant provisions, of the Dublin City Development Plan 2022-2028 (hereafter referred to as the Development Plan) and Item No. 2(a) and (b) of DCC's LRD Opinion, which reads as follows:

a. QHSN40 – Built to Rent Accommodation

Provide justification for how the proposal shall meet the criteria set out in QHSN40, particularly in relation to requirements to facilitate the provision of Build to Rent Accommodation in the following specific locations:

- *Within 500 metre walking distance of significant employment locations,*
- *Within 500 metres of major public transport interchanges (e.g. Connolly Station, Tara Street Station and Heuston Station), and*
- *Within identified Strategic Development Regenerations Areas.*

b. All schemes currently operating as BTR within 1km should also be included in the report submitted regardless of whether the proposal description at planning stage indicated use as BTR, i.e. Griffith Woods (ABP-306836-20 & subsequent applications). For the avoidance of doubt, the 1km radius should be measured from the periphery of the site, rather than a centre point within the site.

This report demonstrates how the proposal is consistent with the BTR policies and associated text in the Development Plan, including Policy QHSN40, and demonstrates the appropriateness of the site for an element of Build to Rent Accommodation as part of an overall mixed use redevelopment. This report is also accompanied by analysis of employment locations and public transport catchment prepared by Space Syntax, attached as Appendix 1, which assists in demonstrating that the site is suitable for a Build to Rent development.

Policy QHSN40 does not state that BTR developments will be restricted to these specific locations, just that BTR will be facilitated at specific locations. The specific locations are not mandatory requirements for all build to rent developments and therefore build to rent developments can still be permitted in other locations including Inner Suburban locations such as the subject site, subject to the applicant demonstrating the appropriateness of the site for BTR development, which this report and supporting reports seeks to demonstrate. This policy position is reflected under the Z12 zoning objective, on which the proposed BTR units are proposed, which includes BTR as an open for consideration use and reflected elsewhere in the Development Plan which states that *"In order to achieve a sustainable tenure mix in neighbourhoods, the Build to Rent residential typology will be in the open for consideration category."*

This report demonstrates that the subject site will continue to accommodate St. Vincent's Hospital Fairview, in a new state of the art facility providing employment for c. 200 persons, that there are a range of businesses in proximity to the site and that the site is an Inner

Suburban location within reasonable walking and cycling distance to employment nodes within the city centre and therefore the site is suitable for an element of BTR development as proposed in this application. This report acknowledges that although the site is not within 500m and 1,000m of a public transport interchange, as set out in Policy QHSN40, there is a significant number of bus stops within 500m and 1,000m from the site which operate frequent services. Thus, the site is considered to be suitable for Build to Rent development. This report includes some spatial information prepared by Space Syntax, included as Appendix 1, on the employment locations and the public transport catchment of the application site.

This reports also demonstrates that the proposed BTR scheme is appropriate given the current shortage of residential accommodation in Dublin, particularly in the rental market, and therefore it is considered that there is a significant need for the BTR element of the proposed development, which comprises a total of 317 no. build to rent units. It is noted that the proposal also includes 494 no. standard apartments and BTR is a subordinate element of the proposed development.

This report also demonstrates that due to the changing demographic trends in Dublin and the rising costs of traditional renting, there is a demand for this type of accommodation and accordingly, there is a requirement for the proposed development to contribute, albeit in a limited way given the small scale of the development, to addressing the housing needs of the area.

This report also demonstrates that within a 1km radius of the site there is only 1 no. BTR development of 183 no. units which is currently under consideration at No. 146A and 148-148A Richmond Road, Dublin 3 under SHD ABP Ref.: 312352-21. An Bord Pleanála permitted a BTR development of 1,614 units at Clonliffe Road Holy Cross College, Clonliffe Road, Dublin 3 and Drumcondra Road Lower, Drumcondra, Dublin 9 under SHD ABP Ref.: 310860-21, however, this decision was subsequently quashed by the Courts and therefore is not included in the assessment of concentration of BTR schemes within 1km of the subject site.

We understand that an apartment scheme, which is operating as a Private Rental Sector (PRS) scheme, of c. 377 no. units at Griffith Wood (granted under ABP Ref.: 303296-18) is within 1km of the subject site. It should be noted that while this scheme is operating as a PRS, this was applied for as a standard apartment scheme in accordance with the Apartment Guidelines 2015 and it is not permitted as a Build to Rent development. Therefore, it is not considered appropriate or necessary in the context of Policy QHSN40 to include in this study and assessment which considers whether there is an over-proliferation of Build to Rent schemes within 1km from the periphery of the site, as Griffith Woods is not a BTR scheme. This report demonstrates that the proposed development will not result in over proliferation of the Build to Rent units in the area as required under the Development Plan.

Policy QHSN42

We refer to the 'Justification for Proposed BTR and Amenity Areas' report prepared by CBRE which has been prepared in response to Policy QHSN42. The report provides an evidence based analysis in support of the quantum and quality of resident facilities and services provided for the BTR element of the overall BTR scheme.

Transitional Arrangements

We also note that in considering the subject application and the Development Plan, that the Planning Authority must have regard to Circular Letter NRUP 07/2022, which was published with the amended Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities (2022), and which provides for transitional arrangements for BTR schemes which are 'in the system', stating the following:

“Transitional Arrangements

All current appeals, or planning applications (including any outstanding SHD applications and appeals consequent to a current planning application), that are subject to consideration within the planning system on or before 21st December 2022, will be considered and decided in accordance with the current version of the Apartment Guidelines, that include SPPRs 7 and 8.

Furthermore, in cases where a request for a Large-Scale Residential Development (LRD) meeting has been submitted to a local authority for a proposal that includes specified BTR development in accordance with s.32B of the Planning and Development Act on or before the date of this Circular (21st December 2022), even if the LRD meeting has yet to take place, the opinion has yet to issue, or a planning application has yet to be made but is made within 6 months of receipt of the opinion as required by s.32A of the Act, the development will be assessed by the local authority and where applicable, on appeal to the Board, in accordance with the Guidelines issued prior to the BTR update i.e. the version of the Apartment Guidelines that includes SPPRs 7 and 8, will remain applicable.” (Emphasis added)

The subject application received an LRD Opinion from Dublin City Council under Ref.: LRD6009/22-S2 on the 15th of December 2022, following the submission of a Stage 2-LRD Opinion request on the 25th of October 2022, i.e. in advance of the update to the Guidelines being published, and thus, as demonstrated in the Planning Report and Statement of Consistency, the BTR element of the proposed development should be assessed in accordance with the Guidelines issued prior to the BTR update i.e. the version of the Apartment Guidelines that includes SPPRs 7 and 8, rather than the new BTR provisions in the Apartment Guidelines 2022. The standard design apartments proposed within the scheme are assessed under the provisions of the updated Apartment Guidelines 2022.

2.0 SUBJECT SITE AND DESCRIPTION OF PROPOSED BUILD TO RENT DEVELOPMENT

2.1 Site Location & Context

The subject site is located approximately 550m from the District Centre of Fairview and c. 1km from the District Centre of Drumcondra, as identified in Figure 5.1 of the Development Plan relating to neighbourhoods. Both areas are well served by amenities and services which are accessible to the subject site.

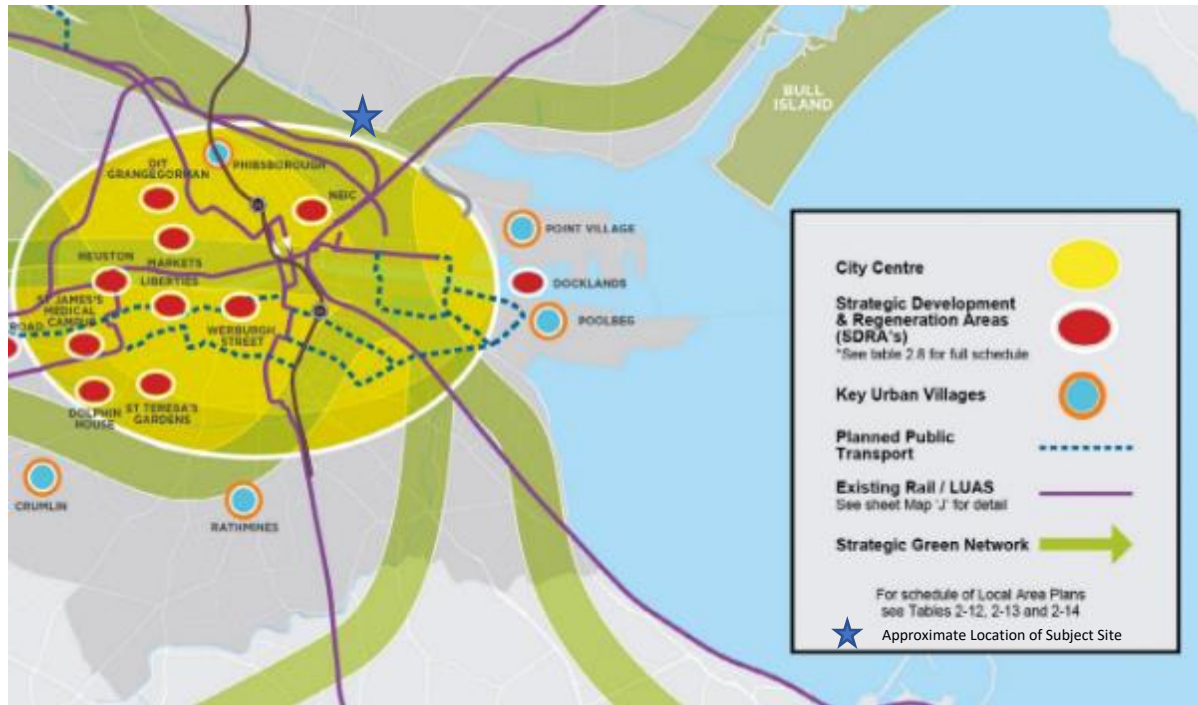
The application site is in an ‘Inner Suburban’ and accessible location. The site is located c. 300m from the Royal Canal at Ballybough Luke Kelly Bridge, which is located just outside of the City Centre as outlined in the Core Strategy map of the Development Plan (see Figure 2.1 below). The site is located c. 1.6km from Eastpoint Business Park (East Wall), c. 2km from Connolly Station, c. 2.2km from IFSC and c. 2km from the Docklands. The site is therefore considered to be within reasonable walking and cycling distance of the city centre and therefore suitable for the scale and density of development proposed.

As outlined in Figure 2.2 below, the site is within reasonable walking distance of high quality public transport. The site is within c. 4 minutes walking distance to the bus stop on Philipsburgh Avenue (350m) via the proposed connection through Griffith Court to the north and c. 6 minutes walking distance to the Fairview Strand bus stop to the east (550m) via the main entrance from Richmond Road. The bus stops at Fairview Strand and Philipsburgh Avenue are served by Bus Route No. 123 (with a peak frequency every 10 mins).

The site is within reasonable walking distance (details included below) of high quality public transport, including existing Drumcondra Road QBC and BusConnects Radial Core Bus Corridor ‘H-Spine’ at Annesley Bridge Road. The Drumcondra Road QBC is proposed as

BusConnects Radial Core Bus Corridor 'A Spine' and due to be launched later in 2023. The site is also located near two proposed Core Bus Corridors including CBC1 - Clongriffin to Marino (submitted to An Bord Pleanála under Ref.: HA29N.313182) and CBC2 - Swords to City Centre (not yet submitted to An Bord Pleanála for approval).

Figure 2.1: Extract of Core Strategy Map Dublin City Development Plan 2022-2028



The subject site is within a 7 minute walking distance of Drumcondra Road QBC which is situated c. 560m to the west via the proposed connection through Grace Park Wood. The bus stops on Drumcondra Road Lower, which are within c. 650 metres / c. 8 minutes walking distance from the subject site, include the following bus routes (peak frequencies in brackets):

- Nos. 1 (every 10 mins), 11 (every 15 mins), 13 (every 10 mins), 16 (every 10-12 mins), 41 (every 20 mins) and 44 (every 60 mins).

The proposed Bus Connects 'A Spine' indicates a frequency of between 3-4 minutes between buses during peak hours. It is c. 850m walking distance to the bus stops on Drumcondra Road via Richmond Road.

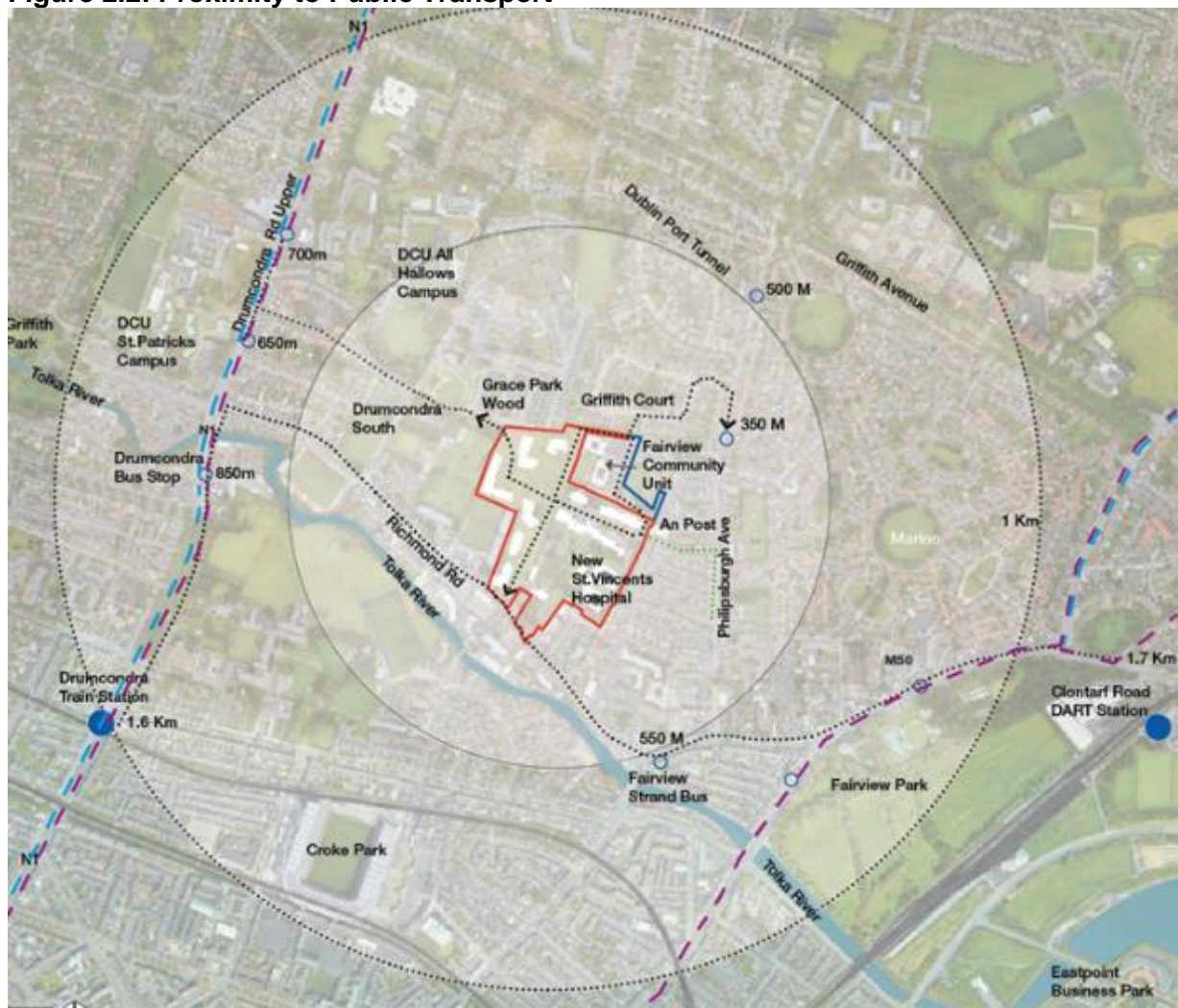
The site is also within c. 10 minutes walking distance (c. 850m) to the BusConnects Radial Core Bus Corridor 'H-Spine' and bus stops at Annesley Bridge and Fairview (Marino Mart) via the main entrance from Richmond Road. These bus stops are served by Bus Route No's 14 (every 10-12 mins), 15 (every 10 mins), 27 (every 10 mins), 27A (every 35 mins), 27B (every 15 mins), 42 (every 20 mins), 43 (every 15 mins), 130 (every 10 mins), Bus Connects H1 (every 15 mins), H2 (every 30 mins) and H3 (every 30 mins).

In addition, the site is located within 1.6km (20 minute walking distance / 6 minute cycle) of Drumcondra Rail Station and within 1.7km (22 minutes walking distance / 7 minute cycle) of Clontarf DART Station.

Having regard to the above, the subject site can be considered to fall within a 'public transport corridor', which is identified as one of the key locations in the City for increased heights and densities in Appendix 3 of the Development Plan. The public transport accessibility and Inner Suburban location of the site is also reflected in the site's location within Car Parking Zone 2 as identified on Map J of the Development Plan. The accompanying Public Transport Capacity

Study prepared by OCSC provides details of the number and frequency of existing bus routes serving the area and demonstrates the capacity of the existing public transport services to cater for the additional demand arising from the proposed development.

Figure 2.2: Proximity to Public Transport



Source: STW Architectural Design Statement (Note: The red line indicates the approximate outline of the land within the ownership of the applicant, please refer to STW's Site Location Map and Site Layout Plan for the full extent of the proposed development").

Figure 2.3: Connectivity to Public Transport



2.2 Summary of the Proposed Build to Rent Element of the Overall Development

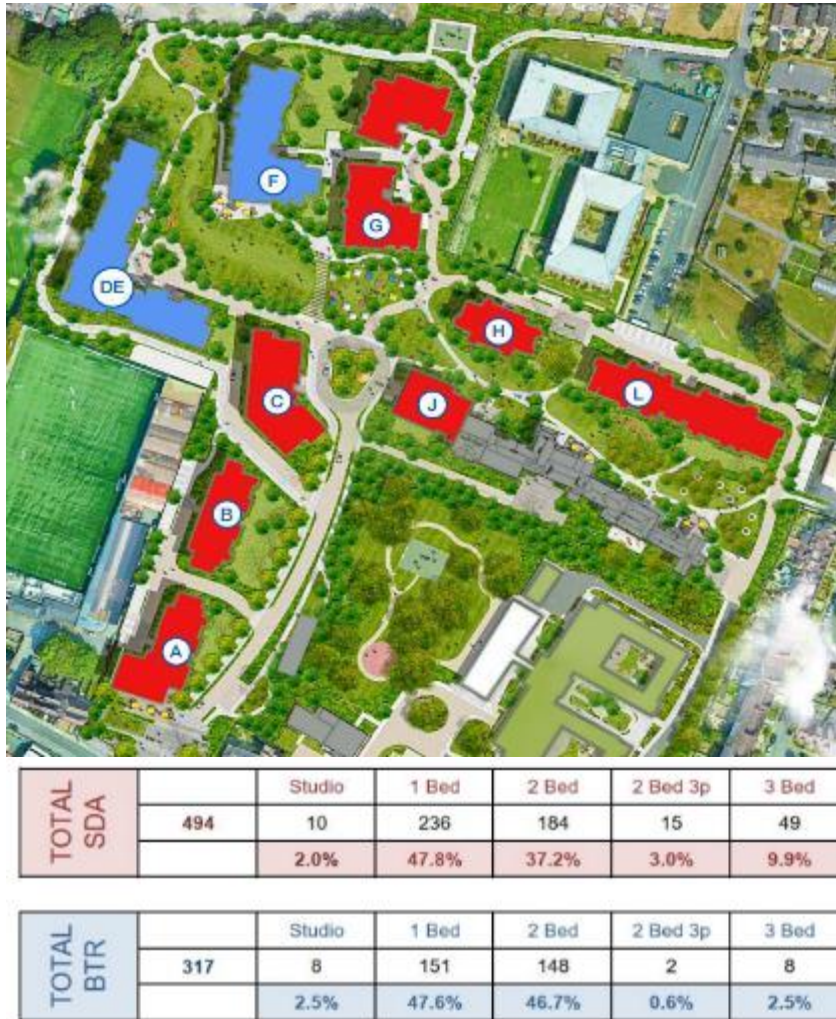
The residential element of the overall proposed development provides for a total of 811 no. residential units in 9 no. residential blocks (A, B, C, D-E, F, G, H, J and L) including 317 no. Built-to-Rent apartments and 494 no. standard design apartments, and 4,802 sq.m of residential amenity space. The proposed mix for the overall residential development is as follows:

- 18 no. studios (2%)
- 387 no. 1 bed apartments (48%)
- 349 no. 2 bed apartments (43%)
- 57 no. 3 bed apartments (7%)

The 317 no. BTR units are located in residential buildings D-E and F, which are located on the Z12 zoned portion of the overall landholding. The mix of BTR units includes 8 no. studios (2.5%), 151 no. 1 beds (48%), 150 2 beds (47%) and 8 3 beds (2.5%).

The unit split between BTR (39%) and SDA (41%) apartments complies with the requirement of Policy QHSN40 which seeks to limit the BTR typology in schemes over 100 units to a maximum of 40%, to ensure that the proposed scheme provides opportunities for a sustainable mix of tenure and long term sustainable communities.

Figure 2.4: Breakdown of Proposed Residential Development



The BTR element of the proposed development is considered to be an appropriate use for part of the site having regard to national and local planning policy which supports infill residential development and compact growth in urban locations, in particular Dublin city and suburbs. The proposed BTR scheme will make a positive contribution to the tenure mix of the area, particularly given its location in an established suburban area served by high quality public transport.

A draft legal covenant is submitted as part of the application which confirms that the proposed Build to Rent element of the scheme will remain in the ownership of an appointed Build to Rent company, who will manage the operation of the scheme, for a minimum period of not less than 15 years. Furthermore, no individual BTR residential units will be sold or rented separately by the company during that period and the applicant accepts that this will be controlled by a condition of planning.

Furthermore, it is also submitted that having regard to the existing mix and tenure of the residential accommodation in the area, the provision of a BTR element within this scheme will contribute to the availability and range of residential accommodation in the area.

The subject site is appropriate for a BTR development of the scale proposed, i.e. 317 no. BTR units, and which can be efficiently managed. We refer to the Mixed Use Operational Management Plan submitted with the application, which has been prepared by Hooke & MacDonald and which states that a property management services provider will be appointed

and will be responsible for the management of the day to day operations, including facilities management and resident engagement.

Residential Support Facilities and Amenities

As detailed in STW Design Statement, the proposed development includes a total of 4,781 sq.m of residential amenity space, community facilities and commercial floorspace (excluding the new hospital), to serve the overall residential development and the wider public. This includes the following:

Table 2.1: Overall Commercial, Community and Residential Amenity Areas

Residential Amenity	Building	Area m ²
Concierge, Post, Laundry	J	327
Gym	K1	1,459
Dedicated Tenant Facilities	K1	711
Creche	K3	730
Co-working	K2	817
Library	K2	N/A
Community Hall	K4	N/A
Residents Lounge	C	55
Residents Lounge / Dining / Meeting	DE	561
Resident's Meeting	F + G	122
Total		4,781.5m

Table 2.2 below provides a summary of the proposed resident support facilities and amenities which are proposed to be dedicated solely to the BTR element of the overall development in accordance with Section 15.10.1 of the Development Plan and SPPR7 of the Apartment Guidelines 2020 (Circular NRUP 07/2022 applies), which include the following:

- Resident Services and Amenities: Resident lounge, function rooms, recreational areas etc.
- Resident Support Facilities: Concierge, management facilities etc.

Table 2.2: Summary of Proposed Residential Support Facilities and Amenities for the BTR Element of the Development

Number of BTR Units	Number of bedspaces	Total Resident Services & Amenities	Total Resident Support facilities (note this is shared with SDA units)	Total Residential Support Facilities + Resident Services & Amenities	DCC Requirement (3 sq.m per person for BTR)	Total per person
317	958	1,264.4 sq.m*	3,713.35 sq.m**	4,977.75 sq.m	2,874 sq.m of (3 sq.m X 958 no. bedspaces for the 317 no. BTR units).	5.2 sq.m

* Block K1 (residents lounge & library), Block D-E (residents lounges, meeting rooms and a cinema room at ground floor level, resident's lounge, cooking and dining facilities at sixth floor level and a residential lounge at twelfth floor level), Block F (lounge / Meeting Area at ground floor level). ** Block DE (concierge), Block J (concierge, post room, laundry), Block K2 (co-working, community library), Block K4 (community hall), bin store, bike store (NOTE: Resident Support facilities shared with SDA units)

Section 15.10.1 of the Development Plan recognises that the Apartment Guidelines 2020 do not provide a quantitative standard for resident support facilities and resident services and amenities and states that ‘a general guideline of 3 sq.m per person is recommended’. As demonstrated above, the total resident support facilities and resident services and amenities provides for 5.2 sq.m per BTR bedspace, which has regard to best practice and satisfies the ‘guideline’ recommendation in the Plan. We also note that the dedicated resident amenities for the BTR units provide c. 4.2 sq.m per BTR unit which is generous in comparison to other permitted and existing BTR developments. It is submitted that the provision of resident support facilities and resident services and amenities is suitable for the proposed BTR units, having regard to the provision in other exiting and permitted BTR schemes, and the range of other community and commercial uses proposed within the St. Vincent’s Hospital Fairview Redevelopment, which all future residents will have access to.

As set out in the Hooke and MacDonald Mixed Use Operational Management Plan, a professional property management services provider will be appointed (the “Property Manager”) which will include an on-site resident management team (“Resident Management Team”), based in the tenant concierge area of Block D-E for the Build to Rent apartments and Block J servicing the standard design apartments. The Resident Management Teams’ key responsibility will be for the management of day to day operations including customer engagement, both in person and electronically. There will be multiple staff on site during the week and it is envisaged that the main on-site hours will be 8.30am-8.30pm Monday-Friday; 10am-4pm Saturday; Sunday & Bank Holidays 11am-2pm.

As outlined in the Mixed Use Operational Management Plan, the other facilities outlined in Table 2.1, which include the concierge in Block J, gym in Block K1, co-working in Block K2, community hall in Block K4, library in Block K2, and will be made available to the residents of the Build to Rent units, as well as serving the standard designed apartments and the wider community.

In addition to the dedicated residential support and amenity spaces in Block K1, D-E, F, communal roof terraces are proposed in Block D-E, with one at fifth floor level, two terraces at sixth floor level, one terrace at ninth floor level, and one terrace at twelfth floor level. The development also includes the provision of public open space, communal open space and other communal internal amenities for the overall residential development which will ensure that a high-quality standard of living that encourages social interaction will be provided for the future tenants.

3.0 COMPLIANCE WITH PLANNING POLICY FRAMEWORK

The following section sets out the key national and local planning policy framework of relevance to the proposed Build to Rent element of the overall development and includes a response outlining how the proposals comply with the relevant BTR policies.

3.1 Project 2040 – The National Development Plan and National Planning Framework

The NPF predicts that between 2018 and 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. Within this figure, there is a wide range of differing housing needs that will be required to be met. The NPF focuses on development on the top 5 cities with 50% of that development within Dublin and targeted at brownfield and infill sites. Sustainable and accessible sites near transport and employment have priority, and new mechanisms such as BTR apartments are a means of achieving this densification.

With regard to rental accommodation, the NPF sets out the following key provision:

“To more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to build inwards and upwards, rather than outwards. This means that apartments will need to become a more prevalent form of housing, particularly in Ireland’s cities.

This is underpinned by on-going population growth, a long-term move towards smaller average household size, an ageing and more diverse population, greater mobility in the labour market and a higher proportion of households in the rented sector (page 93)”.

In securing compact and sustainable growth, a focus on ‘Tackling legacies such as concentration of disadvantage in central urban areas through holistic social as well as physical regeneration and by encouraging more mixed tenure and integrated communities.’

The NPF also states “More affordable homes must be provided in our urban areas as part of the creation of mixed-tenure communities”.

“Allowing for choice in housing location, type, tenure and accommodation in responding to need” is a National Core Principles to guide the delivery of future housing.

Response: A key benefit of BTR development is the potential to accelerate the delivery of new housing at a significantly greater scale than at present and also providing increased choice of tenure within an established urban location in accordance with national housing objectives. It also aims to improve the provision of housing within the rental market, which is a key objective of the NPF. In summary, the delivery of BTR development can make a significant contribution to the required increase in housing supply nationally, envisaged by the National Planning Framework.

The proposed BTR element of the overall development is considered to contribute toward and respond to the national housing shortage identified in recent planning policy. This underutilised, infill site is suitable for a high quality mixed use development, which includes BTR units as part of the overall provision. The proposed development is consistent with NPF objectives as it provides a mix of apartment sizes for the rental market, with supplementary resident facilities, that will meet the needs of future residents.

We also note that recent reports prepared for the Housing Commission indicate that the targets in Housing for All will need to be exceeded to meet the housing needs of Ireland, with a figure closer to 42,000 to 62,000 units per annum required up to 2050 to meet needs of the Country.

3.2 Housing for All

‘Housing for All: A New Housing Plan for Ireland’ acknowledges the lack of accommodation supply and that there are not enough houses to buy or rent in the private sector. Housing for All has a commitment to supplying up to 33,000 homes per year each year up to 2030 to meet targets set out for additional households. The plan emphasises the need for this delivery to be through a variety of tenures, including private rental. The National Housing Need and Demand Assessment included in Housing for All projects the future needs for housing by tenure types based on incomes, house prices and rents, structural demand for housing, existing need and projections. The HNDA outlines that approximately 6,500 new private rental homes are required per annum until 2030 to meet the projection of 33,000 homes per year.

The Housing for All plan recognises that the housing stock in Ireland was not built with the needs of long-term renters in mind and highlights the need for the provision of accommodation for the long term rental market with appropriate offering for a high quality life.

Response: In accordance with Housing for All, the provision of 317 no. Build to Rent apartments as part of an overall mixed use development of these underutilised lands, will provide high quality rental accommodation at an appropriate location within reasonable walking distance to high quality public high frequency/capacity public transport services. The proposed BTR development will assist in the delivery of much needed homes, close to existing amenities as well as high quality public transport options and employment opportunities, thereby contributing to meeting the objectives of 'Housing for All'.

3.3 Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, 2022 (2020 Guidelines where Circular Letter NRUP 07/2022 applies)

The Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, 2020 (Apartment Guidelines, 2020) were recently amended by The Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, 2022 (Apartment Guidelines, 2022), which were issued under s. 28 of the Planning and Development Act on the 22nd of December 2022. The amendment removes Specific Planning Policy Requirements (SPPRs) 7 and 8 of the Apartment Guidelines. The effect of this amendment is that new applications for Build to Rent (BTR) developments are required to be the same as those for all other generally permissible apartment types, however, as outlined below transitional arrangements apply to schemes 'in the system'.

In relation to the aim of the amendment, we note that the Minister emphasised in the Apartment Guidelines, 2022 that, *"the application of this amendment **will not preclude future BTR development from taking place**. Rather, it now requires the standards for BTR development to be the same as those for all other permitted apartment development."*¹ (Emphasis added)

We note that Circular Letter NRUP 07/2022, which was published with the amended Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities (December 2022) (hereafter the Apartment Guidelines 2022), provides for transitional arrangements for BTR schemes which are 'in the system', stating the following:

"Transitional Arrangements - All current appeals, or planning applications (including any outstanding SHD applications and appeals consequent to a current planning application), that are subject to consideration within the planning system on or before 21st December 2022, will be considered and decided in accordance with the current version of the Apartment Guidelines, that include SPPRs 7 and 8."

*Furthermore, in cases where a request for a Large-Scale Residential Development (LRD) meeting has been submitted to a local authority for a proposal that includes specified BTR development in accordance with S.32B of the Planning and Development Act on or before the date of this Circular (21st December 2022), even if the LRD meeting has yet to take place, the opinion has yet to issue, or a planning application has yet to be made but is made within 6 months of receipt of the opinion as required by s.32A of the Act, the development will be assessed by the local authority and where applicable, on appeal to the Board, in accordance with the Guidelines issued prior to the BTR update, i.e. the version of the Apartment Guidelines that includes SPPRs 7 and 8, will remain applicable."*²

The subject application received an LRD Opinion from Dublin City Council under Ref.: LRD6009/22-S2 on the 15th of December 2022, following the submission of a Stage 2-LRD Opinion request on the 25th of October 2022 i.e. in advance of the update to the Guidelines being published, and thus, as demonstrated below, the BTR element of the proposed development should be assessed in accordance with the Guidelines issued prior to

¹ Apartment Guidelines, 2020, pg.4

² DoHLGH Circular Letter NRUP 07/2022, dated 21/12/2022, pg.4

the BTR update i.e. the version of the Apartment Guidelines that includes SPPRs 7 and 8, rather than the new BTR provisions in the Apartment Guidelines 2022. The standard design apartments proposed within the scheme are assessed under the provisions of the updated Apartment Guidelines 2022.

Accordingly, the key elements with respect to the proposed BTR element of the development as set out in the Apartment Guidelines 2020 are set out below:

The Apartment Guidelines, 2020, introduced the concept of BTR and the key components are summarised as follows:

- Section 5 of the Apartment Guidelines, 2020 relates to Build to Rent developments and defines BTR as *'purpose-built residential accommodation and associated amenities built specifically for long-term rental that is managed and serviced in an institutional manner by an institutional landlord'*.³
- BTR accommodation must identify proposals in application documentation as a long term rental housing scheme.
- BTR schemes must be accompanied by a 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.
- BTR accommodation must be owned and operated by an institutional entity for a period of not less than 15 years and no individual residential units can be sold or rented separately for that period.
- BTR developments must be accompanied by detailed proposals for communal and recreational amenities in the form of residential support facilities and residential services and amenities.
- There is no restriction on dwelling mix for BTR developments.
- Flexibility should be applied to storage and private amenity standards.
- There shall be a minimum default minimum or significantly reduced car parking provision on the basis of BTR development being more suitable for central locations and/or being proximate to public transport services.
- Requirements for the majority of units to exceed minimum floor thresholds by a minimum of 10% shall not apply to BTR schemes.
- The requirement for a maximum of 12 apartments per floor per core shall not apply to BTR developments.

Response: In response to the above, we refer to the Planning Report and Statement of Consistency which is submitted with this LRD Application and which demonstrates how the proposed BTR element of the development complies with the SPPRs relating to BTR development.

In respect to future housing need, the Apartment Guidelines 2020 recognises the need for alternative types of accommodation to facilitate the societal and economic changes that have affected household formation and housing demand.

Section 5.1 of the Apartment Guidelines, 2020, state the following in relation to Build to Rent:

*"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."*

³ Apartment Guidelines, 2020, pg.26

The Apartment Guidelines, 2020, generally view BTR as developments that are designed and constructed specifically for the needs of the rental sector. The Apartment Guidelines, 2020, acknowledge that BTR development has the potential to accelerate housing construction which makes 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 Apartment Guidelines, 2020, state the following in relation to central and accessible locations:

'Such locations are generally suitable for small- to large-scale (will vary subject to location) and higher density development (will also vary), that may wholly comprise apartments, including:

- *Sites within walking distance (i.e. up to 15 minutes or 1,000-1,500m), of principal city centres, or significant employment locations, that may include hospitals and third-level institutions;*
- *Sites within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m) to/from high capacity urban public transport stops (such as DART or Luas); and*
- *Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) to/from high frequency (i.e. min 10 minute peak hour frequency) urban bus services.*

Response: The Apartment Guidelines 2020, specifically supports the delivery of BTR developments in central / accessible urban locations, such as the subject site at St. Vincent's Hospital Fairview. As outlined in Section 2 above, the subject site falls into the category of 'Accessible Urban Location' given the site's location within walking distance of existing high-quality bus services and the city centre.

As outlined in Section 2 above, the site is within reasonable walking distance of high quality public transport. The site is within c. 4 minutes walking distance to the bus stop on Philipsburgh Avenue (350m) via the proposed connection through Griffith Court to the north and c. 6 minutes walking distance to the Fairview Strand bus stop to the east (550m) via the main entrance from Richmond Road. The bus stops at Fairview Strand and Philipsburgh Avenue are served by Bus Route No. 123 (with a peak frequency every 10 mins).

The site is within reasonable walking distance (details included below) of high quality public transport, including existing Drumcondra Road QBC and BusConnects Radial Core Bus Corridor 'H-Spine' at Annesley Bridge Road. The Drumcondra Road QBC is proposed as BusConnects Radial Core Bus Corridor 'A Spine' and due to be launched later in 2023. The site is also located near two proposed Core Bus Corridors including CBC1 - Clongriffin to Marino (submitted to An Bord Pleanála under Ref.: HA29N.313182) and CBC2 - Swords to City Centre (not yet submitted to An Bord Pleanála for approval).

The subject site is within a 7 minute walking distance of Drumcondra Road QBC which is situated c. 560m to the west via the proposed connection through Grace Park Wood. The bus stops on Drumcondra Road Lower, which are within c. 650 metres / c. 8 minutes walking distance from the subject site, include the following bus routes (peak frequencies in brackets):

- Nos. 1 (every 10 mins), 11 (every 15 mins), 13 (every 10 mins), 16 (every 10-12 mins), 41 (every 20 mins) and 44 (every 60 mins).

The proposed Bus Connects 'A Spine' indicates a frequency of between 3-4 minutes between buses during peak hours. It is c. 850m walking distance to the bus stops on Drumcondra Road via Richmond Road.

The site is also within c. 10 minutes walking distance (c. 850m) to the BusConnects Radial Core Bus Corridor 'H-Spine' and bus stops at Annesley Bridge and Fairview (Marino Mart) via the main entrance from Richmond Road. These bus stops are served by Bus Route No's 14 (every 10-12 mins), 15 (every 10 mins), 27 (every 10 mins), 27A (every 35 mins), 27B (every 15 mins), 42 (every 20 mins), 43 (every 15 mins), 130 (every 10 mins), Bus Connects H1 (every 15 mins), H2 (every 30 mins) and H3 (every 30 mins).

In addition, the site is located within 1.6km (20 minute walking distance / 6 minute cycle) of Drumcondra Rail Station and within 1.7km (22 minutes walking distance / 7 minute cycle) of Clontarf DART Station.

3.4 Dublin City Development Plan 2022-2028

The Development Plan was adopted on the 2nd of November and came into effect on the 14th of December 2022. The relevant guidance and associated policies relating to Build to Rent developments of relevance to this BTR Justification Report are set out below, with a response to each provided.

Section 5.5.7 - Specific Housing Typologies - Build to Rent (BTR) and Shared Accommodation

Section 5.5.7 Specific Housing Typologies provides guidance in relation to Build to Rent developments. The following section clearly demonstrates how the proposed BTR element of the overall development has been informed by and is compliant with the requirements and guidance of the new Development Plan in respect to BTR development.

The Development Plan states the following in relation to Build to Rent Developments:

"It is recognised that Build to Rent (BTR) serves an important role in meeting housing demand and can fill a gap in tenure mix in established areas of owner-occupier housing. Recent emerging trends however, would indicate that the dominance of BTR in large schemes can be to the detriment of standard designed apartment units. Whilst such development has its place in the hierarchy of provision of homes across the city, the Planning Authority will seek to avoid over proliferation of such use in certain areas and encourage such development as part of a healthy mix of tenure in order to create sustainable communities and neighbourhoods.

BTR should be concentrated in significant employment locations, within 500m of major public transport interchanges and within identified Strategic Development Regeneration Areas."

Response: Firstly, we note Section 5.5.7 of the Development Plan and Policy QHSN40 (see below) uses wording that '**BTR should be concentrated**' and '**to facilitate the provision of BTR**', i.e. these are not mandatory requirements for all build to rent developments and therefore build to rent developments can still be permitted in other suitable locations including infill sites located within reasonable walking distance to high quality public transport corridors and where there is not an over concentration of BTR developments at present or permitted, such as the subject site.

We note that the Planning Authority have accepted the principle of providing a BTR development in 'other' locations within the City under the new Development Plan in a recent Notification of Decision to Grant Permission under Reg. Ref.: 4578/22 for a proposed 54 no. unit BTR residential development at 'Dunelm', Rydalmount, Milltown Road, Dublin 6. The Dunelm site is not located within 500m walking distance of a significant employment location, or within a 500m radius of a major public transport interchange (Connolly Station, Tara Street or Heuston Station) or within a Strategic Development Regeneration Area, however, Dublin City Council still considered the site to be suitable area for BTR development being within a 1km radius of Milltown Luas stop and proximate to high quality bus services, and an Inner

Suburban Area close to good existing facilities and services, it is was considered a suitable site for Build to Rent apartments.

As outlined above, the subject site is well served by existing bus services and these bus services offer a high frequency of services to a comprehensive range of destinations. We refer to the Public Transport Capacity Study and Traffic Impact Assessment prepared by OCSC which includes detail on the frequency and capacity of public transport serving the subject site. The study carried out a survey of capacity on Irish Rail and Dublin Bus Routes 1, 123, 14, 16. The study concludes that there is high frequency and available capacity on relevant routes. The TIA outlines that there is an estimated total maximum capacity for 48,348 rail trips and 196,650 bus trips during the peak morning period which is considered to represent the peak daily demand period. According to the report:

“In the context of the aforementioned bus and rail service capacity locally, the demand generated by the development equates to approximately 0.2% of the bus capacity and 0.1% of the rail capacity which is considered negligible.”

Taking the above into consideration, there is considered to be sufficient capacity available in the local public transport network to cater for the estimated demand for the proposed development. It is further noted that there is flexibility with respect to these services to provide increased frequency should demand on a wider basis justify it through the provision of additional buses and trams on key routes by the respective service operators.”

The land use zoning objectives of the subject site under the Development Plan are as follows:

- Z1 Sustainable Residential Neighbourhoods - *To protect, provide and improve residential amenities.*
- Z12 Institutional Land (Future Development Potential) - *To ensure existing environmental amenities are protected in the predominantly residential future use of these lands*
- Z15 Community and Social Infrastructure - *To protect and provide community uses and social infrastructure.*

Blocks D-E and F provide for the 317 no. BTR units and are located on lands zoned Z12 Institutional Land (future development potential). ‘Build to Rent Residential’ is listed as open for consideration under Z12 zoning objective. We refer to the Planning Report and Statement of Consistency for further details of how the proposal complies with the requirements of the Z12 zoning objective.

The subject site is infill and underutilised and given its ‘Central and/or Accessible’ location (as defined under Section 2.4 of the Apartment Guidelines 2020), is suitable for a high-density residential development and increased building heights. The applicant has identified, in this context, the opportunity to provide a high quality residential development on the subject site, comprising 811 no. residential units, which includes 317 no. BTR apartments and ancillary resident amenities and facilities. The proposed development will enhance the built environment, deliver significant permeability / connectivity benefits for the area, whilst respecting the amenity of adjacent properties through the transition of building heights and provide much needed housing in an accessible location.

Section 5.5.7 of the Development Plan goes on to state *“Furthermore, applications for BTR schemes should be required to demonstrate how the development supports housing need, particularly with regard to tenure, unit size and accessibility with particular reference to the Dublin City Council Housing Need and Demand Assessment.”*

Response: In response to housing need, Appendix 1 of the Draft Housing Strategy (forming part of the Development Plan) and Housing Need Demand Assessment, outlines that 4,088

additional private rental units are estimated to be sufficient to meet the needs of the private rental sector in Dublin City over the next six year Development Plan period. This represents 15% of the total housing need within the administrative boundary.

The Development Plan therefore identifies a need for rental accommodation and therefore the proposed Build to Rent element of the overall mixed use development is appropriate as it complies with the relevant guidance set out in the Development Plan.

We also note a recent Daft.ie Irish Rental Report Q3 2022⁴, outlines that there were just 345 no. homes listed for rent in Dublin market on 1st November 2022, which is well below normal levels and the lowest level of availability for November on record. The cost of room rentals has risen sharply with an average increase of 13.7% this year. The report notes there is extreme shortages of rental homes in Dublin, with correspondingly large increases in rents.

It is submitted that the proposed 317 no. BTR units will assist in meeting an element of the rental needs of the city at an appropriate and accessible location.

This trend has continued in the Q4 2022 report released by Daft.ie on the 13th of February 2023. This notes that rents are up by 13.7% year on year, with the number of homes to rent still at a record low nationally. Rents for sitting tenants are also increasing.

The mix of BTR units proposed includes 8 no. studios (2.5%), 151 no. 1 beds (48%), 150 no. 2 beds (47%) and 8 no. 3 beds (2.5%), which is considered wholly appropriate for this part of the City and reflects population statistics and demand in the area, as summarised below:

- Census 2016 data for the Drumcondra South A Electoral Division, which the subject site is located within, indicates that 1 and 2 person households represent the majority of private households (59%). 3+ person households represent 41% of the total private households. As expected for a Dublin City electoral area, these percentages exceed the National average of 52% of private households being 1 and 2 person households
- Furthermore, census data indicates that there is a predominance of houses/bungalows in the area, representing 60% of the type of accommodation compared to only 36% flat/apartments. Therefore, there is a greater supply of larger housing types in the area at present. Thus, it is submitted that it is appropriate to provide a greater provision of smaller unit types within an infill residential development at a strategic location in proximity to high quality public transport and proximate to existing / planned employment nodes.
- 26% of the private households rented from private landlords.
- 61% of the households have 4+ rooms which equates to larger units and bedrooms.

Thus, it is submitted that the proposed unit mix is appropriate for the BTR development, on an infill site, in an accessible location, and has regard to the unit mix in the wider area and likely demand going forward.

Section 5.5.7 continues to state that applications need to demonstrate that *“there is not an over-concentration of Build to Rent Accommodation within an area, including a map showing all such facilities within a 1km radius of a proposal. Such housing will be controlled in the interest of providing a mix of tenure and unit types.”*

Response: We have carried out an assessment of other permitted or proposed Build to Rent developments within 1km of the subject site. Please note, the 1km radius is measured from the periphery of the site, rather than a centre point within the site, as specified under Item 2(b) of the LRD Opinion.

⁴ https://ww1.daft.ie/report/2022-Q3-rentalprice-daftreport.pdf?d_rd=1

As outlined below, there is only 1 no. BTR development of 183 no. units which is currently under consideration at No. 146A and 148-148A Richmond Road, Dublin 3 under SHD ABP Ref.: 312352-21. An Bord Pleanála permitted a BTR development of 1,614 units at Clonliffe Road Holy Cross College, Clonliffe Road, Dublin 3 and Drumcondra Road Lower, Drumcondra, Dublin 9, under SHD ABP Ref.: 310860-21, however this decision was recently quashed by the Courts and therefore is not accounted for when considering the concentration of BTR schemes within 1km of the subject site. This report therefore demonstrates that the proposed development, in combination with existing / permitted BTR development, will not result in over proliferation of the Build to Rent units in the area as required under the Development Plan.

Table 3.1: BTR Schemes Within 1km of the Subject Site

No.	Ref.	Decision	Address	No. of BTR Units
1	SHD ABP Ref.: 312352-21	Under consideration (Case is due to be decided by 22/04/2022)	No. 146A and 148-148A Richmond Road, Dublin 3	183
Total				183

Figure 3.1: Proximity to Other Permitted and Proposed BTR Schemes within 1km



Legend:

- St Vincent Hospital Fairview (Subject Site)
- 1km from the site boundary
- 📍 No. 146A and 148-148A Richmond Road - ABP Ref.: 312352-21

We understand that an apartment scheme, which is operating as a private rental scheme (PRS), of c. 377 no. units at Griffith Wood (granted under ABP Ref.: 303296-18, not ABP Ref.: 306836-20 (which refers to a withdrawn application) as outlined in the LRD Opinion) is located within 1km of the subject site. It should be noted that while this scheme is operating as a PRS, this was applied for and approved as a standard apartment scheme in accordance with the Apartment Guidelines 2015 and it is not permitted as a Build to Rent development. Therefore, it is not considered appropriate or necessary in the context of Policy QHSN40 to include a Private Rental Scheme in a study which assesses whether there is an over-proliferation of Build to Rent schemes within 1km from the periphery of the site, as Griffith Woods is not a BTR scheme.

The accompanying 'Justification for Proposed BTR and Amenity Areas' report prepared by CBRE notes that there is a very limited supply of institutionally owned rental stock in the vicinity of the subject site. The report notes the PRS scheme at Griffith Wood on Griffith Avenue is heavily oversubscribed, with a significant waiting list of prospective tenants. The report states new supply in the vicinity is desperately required and the rental market would easily absorb the proposed BTR units on the subject site. The CBRE Report also states that the location of the proposed BTR development is hugely attractive from a rental perspective due to its proximity to the city, nearby employment hubs and educational/medical facilities.

Section 5.5.7 of the Development Plan continues to state *"In assessing the matter of overconcentration, the Planning Authority will have regard to factors such as:*

- *the number and scale of other permitted and proposed BTR development in the vicinity (within a 1km radius) of the site,*

Response: As set out above, there is 1 no. BTR development of 183 no. units which is currently under consideration at No. 146A and 148-148A Richmond Road, Dublin 3, under SHD ABP Ref.: 312352-21, and therefore it is submitted that the proposed BTR element of the overall mixed use development will not result in over proliferation of the Build to Rent units in the area.

- *the household tenure and housing type of existing housing stock in the approximate vicinity (within a 1km radius) of the site,*

Response: See response outlined above which provides details of the existing housing stock within 1km of the site. There is a predominance of owner-occupied houses when compared with apartments to rent. Therefore, there is an evidence basis to support the proposed development which includes a higher proportion of smaller unit types for rental accommodation. We also note that the application includes a new hospital on the St. Vincent's Hospital Fairview campus which will include significant new employment and further supports the provision of BTR units on the overall site.

- *and the proximity of the proposal to high capacity urban public transport stops and interchange (such as DART, Luas and BusConnects).*

Response: As outlined above, the site is considered to be located within a within reasonable walking distance of high quality public transport. The site is within c. 4 minutes walking distance to the bus stop on Philipsburgh Avenue (350m) via the proposed connection through Griffith Court to the north and c. 6 minutes walking distance to the Fairview Strand bus stop to the east (550m) via the main entrance from Richmond Road. The bus stops at Fairview Strand and Philipsburgh Avenue are served by Bus Route No. 123 (with a peak frequency every 10 mins).

The site is also within walking distance to existing Drumcondra Road QBC and BusConnects Radial Core Bus Corridor 'H-Spine' at Annesley Bridge Road. The Drumcondra Road QBC is proposed as BusConnects Radial Core Bus Corridor 'A Spine' and due to be launched later in 2023. The site is also located near two proposed Core Bus Corridors including CBC1 - Clongriffin to Marino (submitted to An Bord Pleanála under Ref.: HA29N.313182 and CBC2 - Swords to City Centre (not yet submitted to An Bord Pleanála for approval)). Given the proximity to high quality and capacity public transport, it is considered that the site is appropriate for Build to Rent apartments.

The Development Plan continues to state that *"There will be a general presumption against large scale residential developments (in excess of 100 units) which comprise of 100% BTR typology. To ensure a sustainable mix of tenure and long term sustainable communities, a minimum of 60% of standard designed apartments will be required in such instances."*

Response: The proposed development provides a total of 811 no. residential units, of which 317 no. units are Build to Rent which equates to 39% of the total units. The remaining 494 no. units (61%) are standard designed apartments which are designed to comply with the requirements of the Apartment Guidelines 2022, thus, the proposed scheme complies with the above requirement of the new Development Plan.

The Development Plan also states that *"BTR schemes of less than 100 units will generally not be supported. The concept of Built to Rent requires a critical mass of accommodation to provide a meaningful provision of communal facilities and services. Smaller BTR schemes with less than 100 units will only be considered where it can be demonstrated that there is a strong need for the development and a detailed justification is provided."*

Response: The proposed development provides 317 no. BTR units and therefore this guidance does not apply. The proposed development provides a sufficient number of residential units to support the appropriate communal facilities and services. This report sets out that there is a strong need for the proposed development and a detailed justification is provided that, having regard to the location of the proposed Build to Rent element of the overall development within reasonable walking distance of high capacity public transport and the current shortage of residential accommodation, particularly in the rental market, the proposal for 317 no. build to rent units is suitable for this site.

We refer to the 'Justification for Proposed BTR and Amenity Areas' report prepared by CBRE, which provides an evidence based analysis to determine the requirements of renters when seeking rental accommodation in the Dublin market. Based on CBRE's most recent residential occupier survey, the proposed BTR scheme and associated amenities is suitable for renters' requirements in the current market.

As set out in the subsequent sections of the report, in response to housing need, Appendix 1 of the Draft Housing Strategy (forming part of the Development Plan) and Housing Need Demand Assessment, outlines that 4,088 additional private rental units are estimated to be sufficient to meet the needs of the private rental sector in Dublin City over the next six year Development Plan period. This represents 15% of the total housing need within the administrative boundary. The Development Plan therefore identifies a need for rental accommodation and therefore the proposed Build to Rent development is considered to be appropriate as it complies with the relevant guidance set out in the Development Plan and will help meet the identified need.

It is respectfully submitted, that the subject site is particularly suited for an element of BTR development given the limited provision of BTR development or rental accommodation in the immediate surroundings, the proximity to public transport and the provision of a new hospital on the overall site and proximity to other employment uses in the wider area. It is recognised

that having regard to the existing mix and tenure of the residential accommodation in the area, the provision of an element of BTR use on the site, will ensure the scheme will contribute to the availability and range of residential accommodation in the area.

Policy QHSN40 Build to Rent Accommodation

To facilitate the provision of Build to Rent (BTR) Accommodation in the following specific locations:

- *Within 500 metre walking distance of significant employment locations,*
- *Within 500 metres of major public transport interchanges (e.g. Connolly Station, Tara Street Station and Heuston Station), and*
- *Within identified Strategic Development Regenerations Areas.*

There will be a general presumption against large scale residential developments (in excess of 100 units) which comprise of 100% BTR typology. To ensure there are opportunities for a sustainable mix of tenure and long term sustainable communities, a minimum of 60% of units within a development must be designed as standard apartments in accordance with the requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, December 2020.

There will be a presumption against the proliferation and over concentration of BTR development in any one area. In this regard, applications for BTR developments should be accompanied by an assessment of other permitted and proposed BTR developments within a 1km radius of the site to demonstrate:

- *that the development would not result in the overconcentration of one housing tenure in a particular area and take into account the location of the proposed BTR.*
- *how the development supports housing need, particularly with regard to tenure, unit size and accessibility with particular reference to the Dublin City Council Housing Need and Demand Assessment.*

Response: Policy QHSN40 reflects the guidance and text set out under Section 5.5.7 of the Development Plan, which has been addressed in the preceding sections and we therefore refer the Planning Authority to the responses provided under Section 5.5.7 of the Development Plan set out above for details of how the scheme is justified in the context of the above policy. In summary, we note the following:

- Policy QHSN40 does not state that BTR developments will be restricted to these specific locations, just that BTR will be facilitated at these locations. These locations are not mandatory requirements for all build to rent developments and therefore build to rent developments can still be permitted for other locations including Inner Suburban locations such as the subject site.
- The proposed development provides for a total of 494 no. standard designed apartments and 317 no. BTR units and therefore provides 61% of units within the development as standard design apartments in accordance with the requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, December 2022.
- Policy QHSN40 uses wording that '*BTR should be concentrated*' and '*to facilitate the provision of BTR*', i.e. these are not mandatory requirements for all build to rent developments and therefore build to rent developments can still be permitted in other suitable locations including infill sites located within reasonable walking distance to high quality public transport corridors and where there is not an over concentration of BTR developments at present or permitted, such as the subject site.
- Whilst the subject site is not located within 500m walking distance of a significant employment location, or within a 500m radius of a major public transport interchange

(Connolly Station, Tara Street or Heuston Station) or within a Strategic Development Regeneration Area, these are not mandatory requirements for all Build to Rent developments, and the site is still considered to be located within a suitable area being within reasonable walking distance and proximate to high quality bus services, and therefore given the proximity to high quality and capacity public transport, and its location in an Inner Suburban Area close to good existing facilities and services, it is considered that the site is appropriate for Build to Rent apartments.

- The Development Plan projects population growth of 613,000 (low) to 625,000 (high) by 2026. A population of c. 554,500 was recorded in the 2016 census. This represents a c. 10.5% population increase at the lower end, and a c. 12.7% increase at the higher end over this period. By applying a projected growth rate of c. 11.5% to the 2016 population for the 16 electoral districts within 1km of the subject site, the 2026 population can be estimated at 66,956.
- Figure 3.1 and Table 3.1 above provides details of proposed BTR developments within a c. 1km distance from the site. The estimated maximum occupancy for the new BTR residential units is c. 1,035 no. people which is calculated based on the proposed BTR units on the subject site and Richmond Road SHD multiplied by the national average household size for apartments of 2.07.
- The estimated maximum BTR population equates to c. 1.5% of the estimated population in 2026 within 1km of the subject site and is therefore not considered to result in an over proliferation of this housing tenure and will provide much needed and professionally managed rental accommodation in the area.
- It is apparent that there are very limited BTR developments in the immediate proximity of the application site, thus the addition of 317 no. BTR units on this underutilised, brownfield site, will not result in an over concentration of BTR schemes in the area. It is noted that the proposal also includes 494 no. standard apartments and BTR is a subordinate element of the proposed development.
- As set out in this report, in response to housing need, Appendix 1 of the Draft Housing Strategy (forming part of the Development Plan) and Housing Need Demand Assessment, outlines that 4,088 additional private rental units are estimated to be sufficient to meet the needs of the private rental sector in Dublin City over the next six year Development Plan period. This represents 15% of the total housing need within the administrative boundary. The Development Plan therefore identifies a need for rental accommodation and therefore the proposed Build to Rent development is considered to be appropriate as it complies with the relevant guidance set out in the Development Plan and the proposal will help meet this identified need.
- It is respectfully submitted, that the subject site is particularly suited for an element of BTR development given the very limited provision of BTR development or rental accommodation in the immediate surroundings, the provision of a new hospital on the overall lands and the proximity to other employment nodes, public transport and the City Centre. It is recognised that having regard to the existing mix and tenure of the residential accommodation in the area, the provision of a BTR scheme will ensure it will contribute to the availability and range of residential accommodation in the area.

Policy QHSN42 Build to Rent Accommodation

"To foster community both within a BTR scheme and to encourage its integration into the existing community, the applicant will be requested to provide an evidenced based analysis that the proposed resident support facilities are appropriate to the intended rental market having regard to the scale and location of the proposal. The applicant must also demonstrate how the BTR scheme must contribute to the sustainable development of the broader community and neighbourhood."

Response: We refer to the accompanying 'Justification for Proposed BTR and Amenity Areas' report prepared by CBRE which provides an evidence based analysis to justify the quantum

and quality of amenities and support services provided, which has been determined based on the requirements of renters when seeking rental accommodation in the Dublin market.

We also refer the Planning Authority to the Social and Community Infrastructure Assessment/Audit submitted with this LRD planning application, in respect to the significant range of existing amenities and facilities near the subject site, which will provide the necessary services to support the provision of an additional small scale residential development in the area, and indeed which the proposed residential development will help sustain.

4.0 JUSTIFICATION ANALYSIS

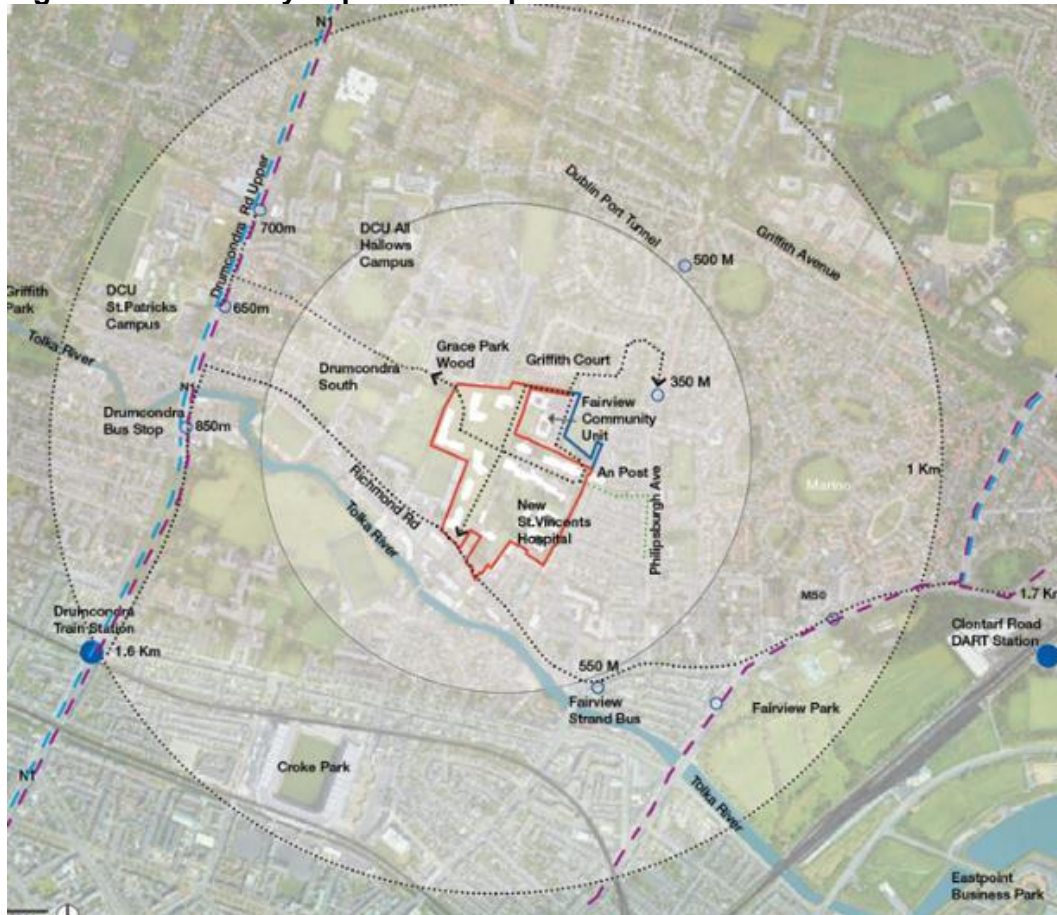
The following section sets out a justification for the principle of an element of BTR development at the subject site based on public transport accessibility and the proximity to local employment centres and demonstrates why the subject site is suitable for an element of BTR development in the context of the BTR policies of the Development Plan, including Policy QHSN40. The information below has been informed by spatial analysis of employment locations and the public transport catchment of the site, based on existing and proposed connections, prepared by Space Syntax, who assisted STW Architects in progressing the initial masterplanning exercise for the lands.

This section will then outline demographic shifts which result in additional demand for rental accommodation, in support of the proposed development.

4.1 Accessibility

As outlined in the Public Transport Capacity Study prepared by OCSC, analysis undertaken by Space Syntax (included as Appendix 1) and the connectivity to public transport analysis undertaken by STW, the site offers residents excellent public transport links, via rail, bus, cycling and walking. The analysis demonstrates that the site is within close proximity to major employment centres in the local area and easy access to Dublin City Centre. The attractive location near good quality public transport and accessible is a key factor in deciding to rent in this location and supports the site to be suitable for a Build to Rent development.

As illustrated in Figure 4.1 and 4.2, the site is located within reasonable walking and cycling distance of the city centre and therefore suitable for the proposed Build to Rent development.

Figure 4.1: Proximity to public transport nodes

Source: STW Architectural Design Statement (Note: The red line indicates the approximate outline of the land within the ownership of the applicant, please refer to STW's Site Location Map and Site Layout Plan for the full extent of the proposed development").

Figure 4.2: Accessibility via 15 minute Cycling

Rail Services

The site is located within 1.6 km (20 min walk / 6 min cycle) of Drumcondra Station. As illustrated in Figure 4.3, this station is served by a vast range of routes, including routes to Maynooth, Hazelhatch/Celbridge, Sligo/Longford and the M3 Parkway stop. Additionally, the site is located within 1.7 km (22 min walk / 7 min cycle) of Clontarf Road Station. As illustrated in Figure 4.2, Clontarf Road station is served by regular DART services between Howth/Malahide and Bray/Greystones via the city centre.

Figure 4.3: Irish Rail Services



Bus Services

The site is within c. 4 minutes walking distance to the bus stop on Philipsburgh Avenue (350m) via the proposed connection through Griffith Court to the north and c. 6 minutes walking distance to the Fairview Strand bus stop to the east (550m) via the main entrance from Richmond Road. The bus stops at Fairview Strand and Philipsburgh Avenue are served by Bus Route No. 123 (with a peak frequency every 10 mins).

The subject site is within a 7 minute walking distance of Drumcondra Road QBC which is situated c. 560m to the west via the proposed connection through Grace Park Wood. The bus stops on Drumcondra Road Lower, which are within c. 650 metres / c. 8 minutes walking distance from the subject site.

The proposed Bus Connects 'A Spine' indicates a frequency of between 3-4 minutes between buses during peak hours. It is c. 850m walking distance to the bus stops on Drumcondra Road via Richmond Road.

The site is also within c. 10 minutes walking distance (800m) to the BusConnects Radial Core Bus Corridor 'H-Spine' and bus stops at Annesley Bridge and Fairview (Marino Mart) via the proposed connection through Lomond Avenue to the east. These bus stops are served by Bus Route No's 14 (every 10-12 mins), 15 (every 10 mins), 27 (every 10 mins), 27A (every 35 mins), 27B (every 15 mins), 42 (every 20 mins), 43 (every 15 mins), 130 (every 10 mins), Bus Connects H1 (every 15 mins), H2 (every 30 mins) and H3 (every 30 mins).

Figure 4.4: Connectivity to Public Transport



4.2 Proximity to Employment Locations

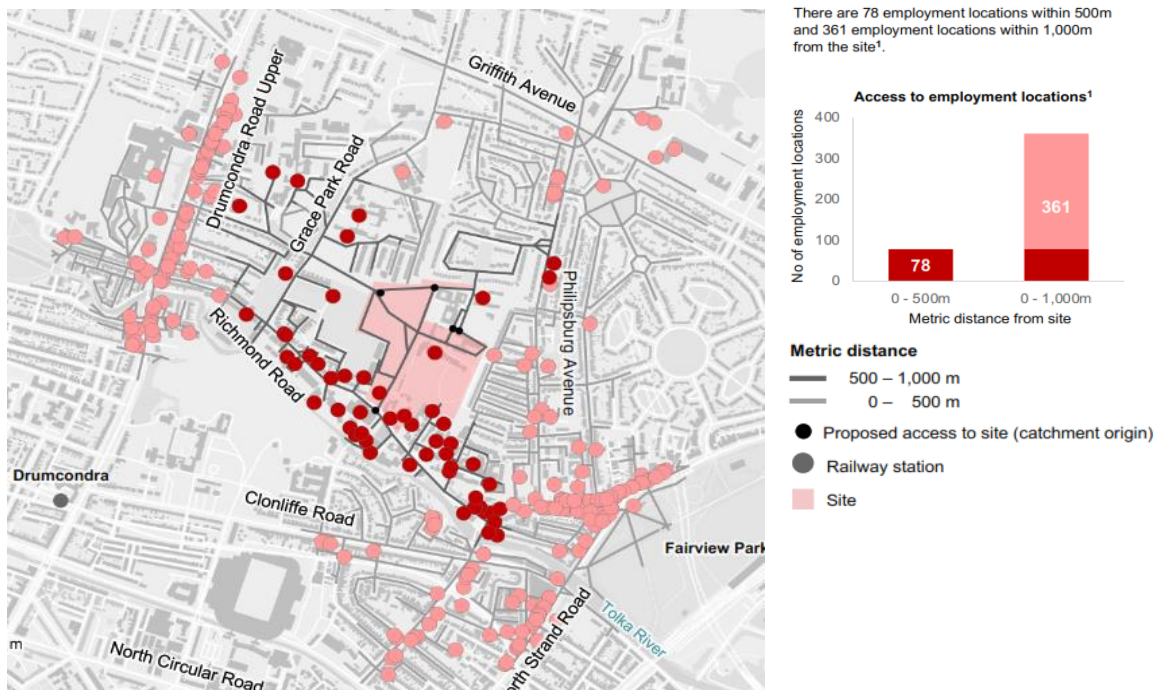
The proposed development includes the provision of a new hospital building, providing mental health services, and associated ancillary buildings and grounds, with employment for c. 200 persons. The new hospital will be a replacement for the existing outdated St. Vincent's Hospital Fairview facilities. The hospital is considered to be a significant employment location as defined under Section 2.4 of the Apartment Guidelines 2020 which states that *"Sites within walking distance (i.e. up to 15 minutes or 1,000-1,500m), of principal city centres, or **significant employment locations, that may include hospitals and third-level institutions**"*.

The site is also suitably located for Build to Rent development, as it is situated within an Inner Suburban area and having regard to its proximity to major employment hubs, with a number of strategic employment centres being within a convenient walking / cycling distance, including the city centre, as illustrated by the 1km radius in Figure 4.5 below. As noted above, this report has been informed by analysis of employment locations in the area prepared by Space Syntax, and Figure 4.6 below identifies the proximity of the site to a range of different employment types within 500m (94) and 1,000m (399) from the site, via existing and proposed connections from the subject site to the surrounding area (Figure 4.6 below).

Figure 4.5: Significant Employment Nodes



Figure 4.6: Employment Locations in Proximity to the Site (Provided by Space Syntax based on existing and proposed connections)



1- <https://www.geodirectory.ie> GeoDirectory, Business address, NACE classification and number of employees (GeoAddress Online Dataset #14-02-20231549768457.xlsx) <https://www.geodirectory.ie>

4.3 Demographic Shifts

National Trends

The CBRE Justification for Proposed BTR and Amenity Areas Report notes that recent demographic trends which show people are buying their first home, getting married and having their first child at a later age compared to years previous. The report also notes that the area is becoming increasingly dominated by younger age cohorts who are predominantly renting and new developments encourages younger population profile. Such trends have a consequential result in people renting for a longer period of time and therefore increases the demand and need for rental accommodation in appropriate locations in Dublin, such as the subject site.

The report outlines that the age of home buyers has been increasing with the median age increasing from 35 to 38 years between 2010 and 2019, across all transactions (sole purchasers and joint purchasers). This indicates the increase of people renting which increases the demand for available rental accommodation. It is therefore submitted that the proposal for 317 no. BTR units will contribute to addressing the housing needs of the area and provide high quality rental accommodation at an appropriate location in Dublin.

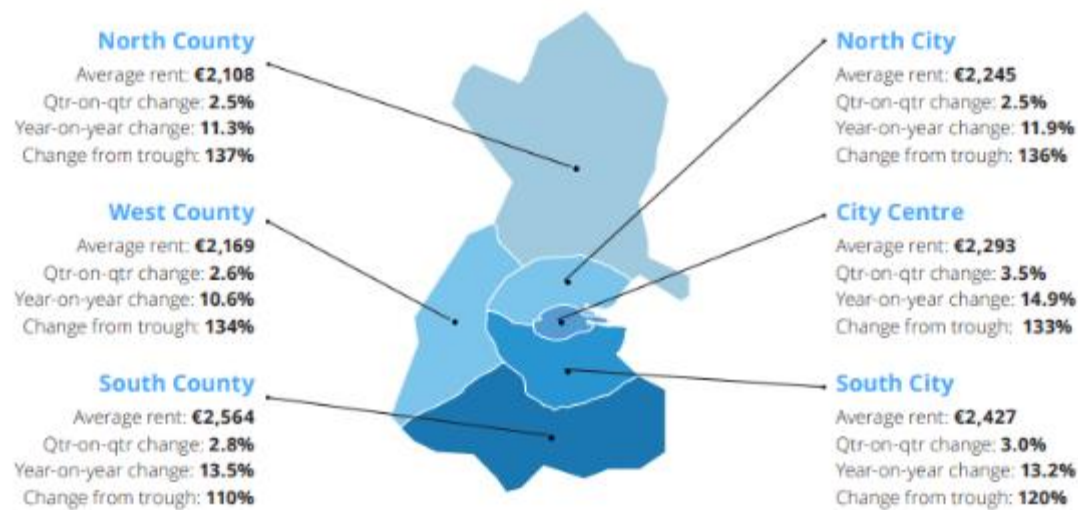
Affordability

The latest rental report from Daft.ie found the availability of rental homes has reached an all-time low and that rents are increasing on a year-on-year basis.

For Dublin 3, the average monthly rent for a 1 bed apartment is €1,634, €1,979 for a 2 bed and €2,473 for a 3 bed. This is an increase of 9%, 10% and 11% respectfully from last year, which is similar to the annual change for Dublin North City as outlined in Figure 4.7.

This average month's rent is above the average market rent nationwide, which between January and December September was €1,733 per month, up 13.7% on the 2021 national average and the strongest rate of inflation in market rents for a calendar year since the start of the Daft Report in 2005.

We note the Daft Report 2022 Q3 states that *"The BTR system had helped generate a pipeline of tens of thousands of new rental homes that are now coming on stream and represent the best hope for alleviating the chronic shortages in the rental market"*.

Figure 4.7: Rental Market and Comparable Schemes

Source: *Daft.ie Rental Report 2022 Q4*

Thus, it is apparent from the accessibility, demand and need requirements, that the subject site is a suitable location for the BTR element of development proposed as part of an overall mixed use redevelopment of these underutilised lands, situated in an Inner Suburban location.

5.0 CONCLUSION

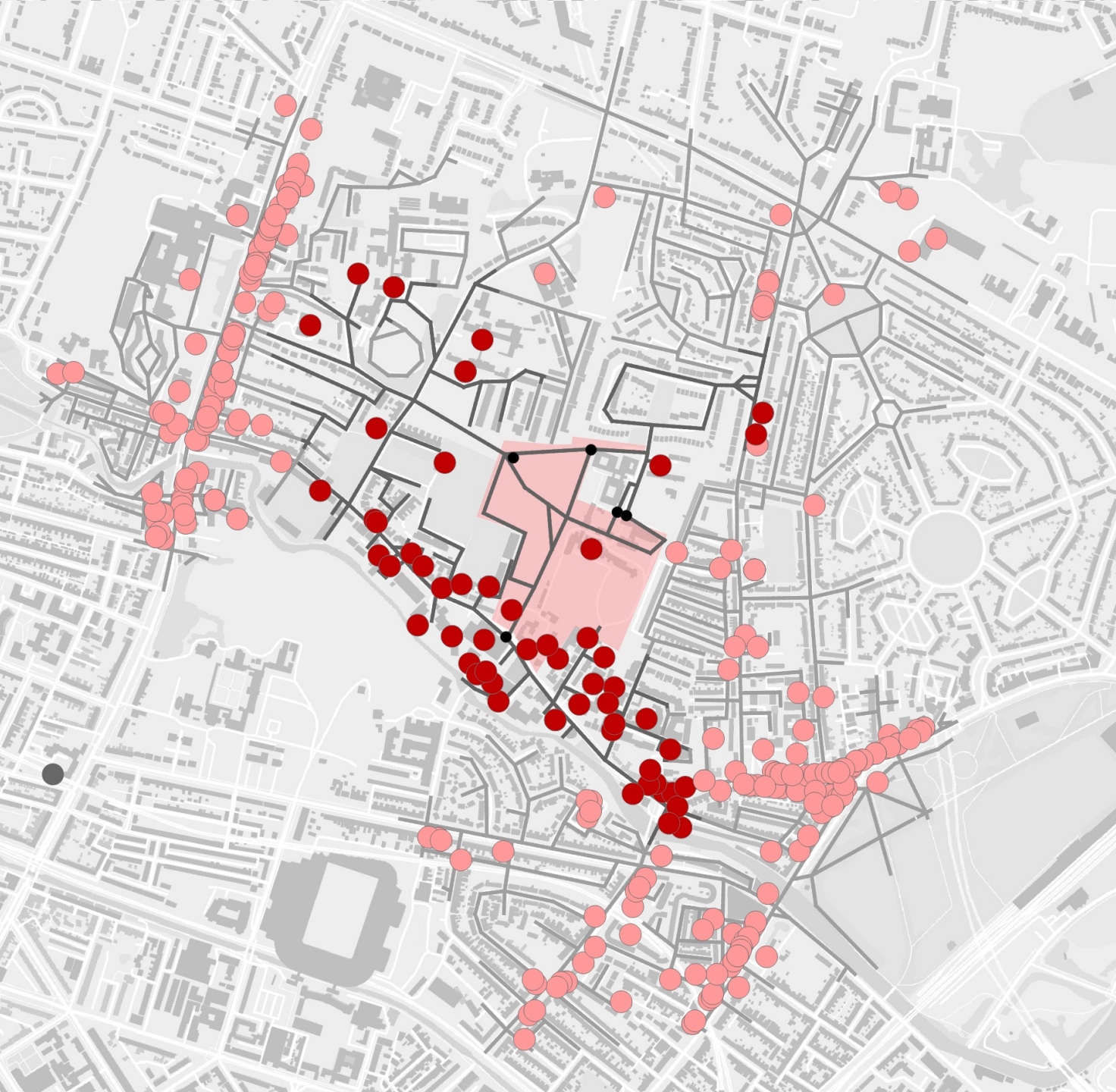
This BTR Justification Report is submitted in response to Section 5.5.7 Specific Housing Typologies and Policy QHSN40 of the new Development Plan 2022-2028, which came into effect on 14th of December 2022, and in response to Item 2(a) and (b) of DCC's LRD Opinion.

The report demonstrates that, having regard to the location of the proposed Build to Rent element of an overall mixed use development in an Inner Suburban location, within reasonable walking distance of high frequency and high capacity public transport, the provision of a new hospital on the overall site and proximity to other employment locations, and the current shortage of residential accommodation in the City, particularly in the rental market, that there is a significant and established need for the proposed 317 no. Build to Rent units.

This report also demonstrates that due to the changing demographic trends in Dublin and the rising costs of traditional renting, there is an increasing demand for BTR accommodation as part of the overall housing tenure mix (as reflected in Housing for All) and accordingly, there is a requirement for an element of the overall mixed use to contribute to addressing the housing needs of the area. The proposed mix of tenure, including 39% BTR units and 61% SDA units complies with the recommendations of the Development Plan for schemes greater than 100 residential units.

It is apparent that there are very limited BTR developments in the immediate proximity of the application site, thus the addition of 317 no. BTR units on this underutilised, infill and Inner Suburban site, will not result in over concentration of Build to Rent developments in the area.

**APPENDIX 1 – EMPLOYMENT LOCATIONS & PUBLIC TRANSPORT CATCHMENT
ANALYSIS PREPARED BY SPACE SYNTAX**



St Vincent's Hospital Redevelopment, Fairview, Dublin

Employment locations & public transport catchment analysis

Final

March 2023

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Introduction

Background

The design team led by Scott Tallon Walker Architects are progressing an application for the redevelopment of St Vincent's Hospital Fairview, Dublin.

As part of Stage 1 pre-application review process, Space Syntax assisted the team by demonstrating the performance of the proposed masterplan and public realm design and its impact on connectivity to its local context and the local amenities. This study was completed in December 2021 and Stage 1 has been approved.

Through this process, Dublin City Council have asked the team to provide justification for how the proposal is consistent with the BTR policies of the new plan, including QQHSN40, to demonstrate the appropriateness of the site for Build to Rent Accommodation.

Key questions

The study will address the following key questions:

- How many employment locations are within 500m and 1,000m from the site?
- How many major public transport interchanges and other public transport services are within 500m and 1,000m from the site?

Approach

Space Syntax employs a unique, science-based and human-focused modelling approach to the evaluation of urban planning and design proposals.

At the heart of this approach is the use of a unique set of methodologies and modelling techniques which focus on the links between spatial configuration and user behaviour.

These techniques allow an understanding of how the variables of size, shape and relation to other spaces impact on patterns of pedestrian movement, public space activity, legibility, safety, user communication and experience.

Our evidence-based approach helps to inform the understanding of the existing condition of the site and the likely impact of the proposed designs on pedestrian movement patterns as well as on the social interactions and activity.

Methodology

Catchment analysis

The street network was used to measure walking distances from the site access points.

Employment locations data¹ were geocoded and linked to the model to calculate how many can be accessed within 500m and 1,000m from the site access points.

Public transport data² were also linked to the model to calculate how many can be accessed within 500m and 1,000m from the site access points.

Data sources

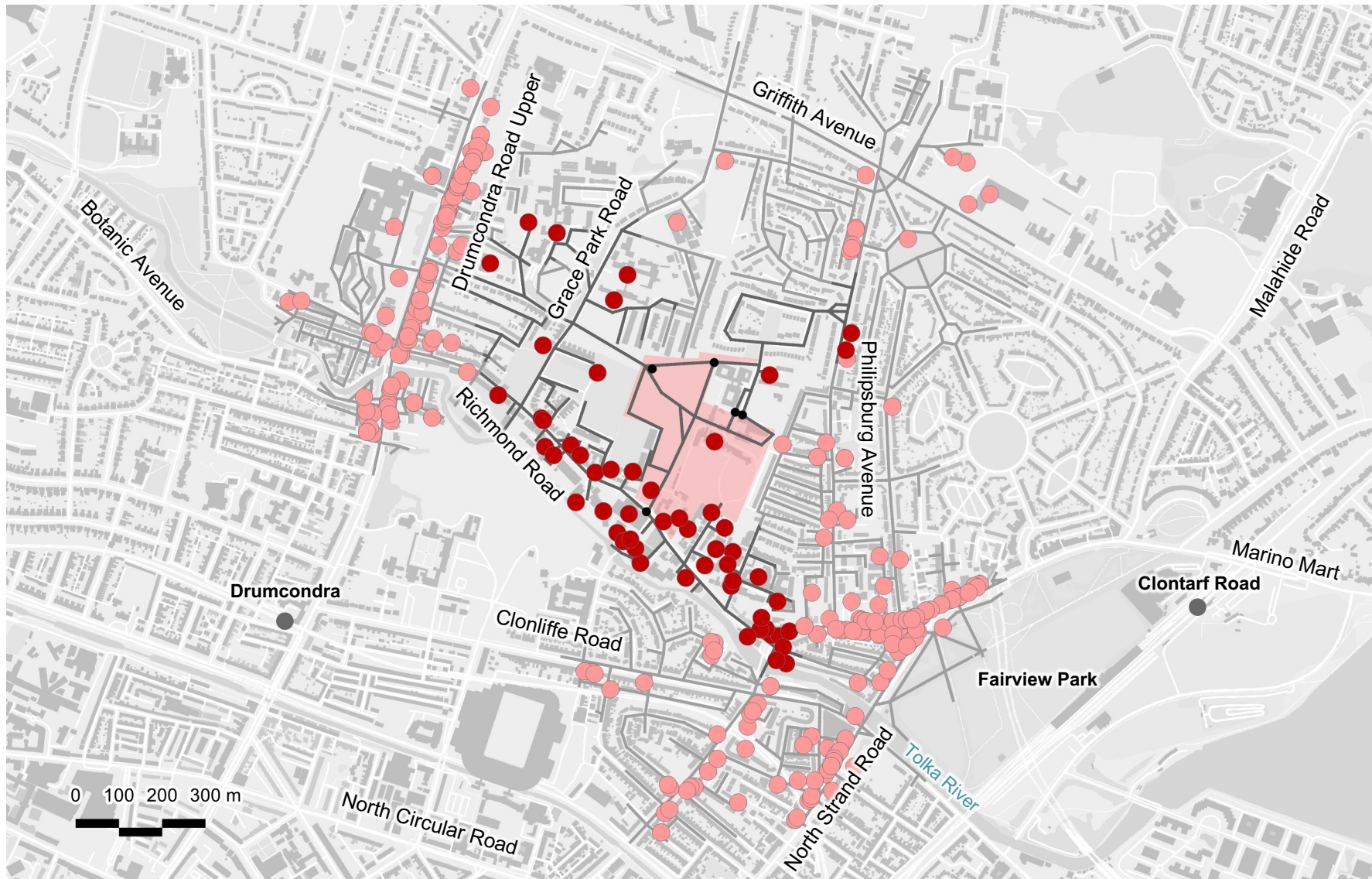
¹ Employment locations

GeoDirectory,
Business address, NACE classification and number of employees
GeoAddress Online Dataset #14-02-2023
1549768457.xlsx
<https://www.geodirectory.ie>

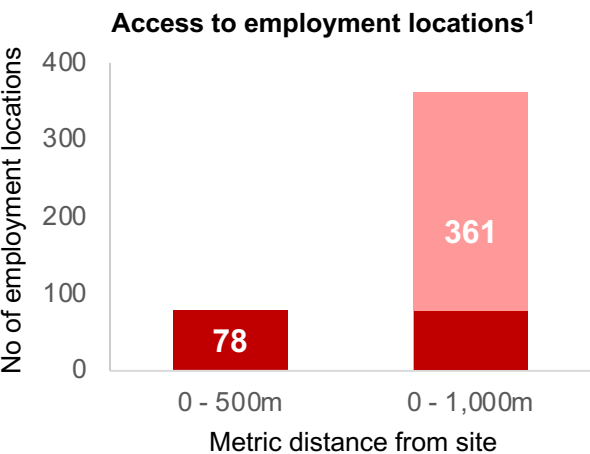
² Public transport

OSM data and Google maps

Access to employment locations



There are 78 employment locations within 500m and 361 employment locations within 1,000m from the site¹.



¹ Data Source
GeoDirectory,
Business address, NACE classification and
number of employees
GeoAddress Online Dataset #14-02-2023
1549768457.xlsx
<https://www.geodirectory.ie>

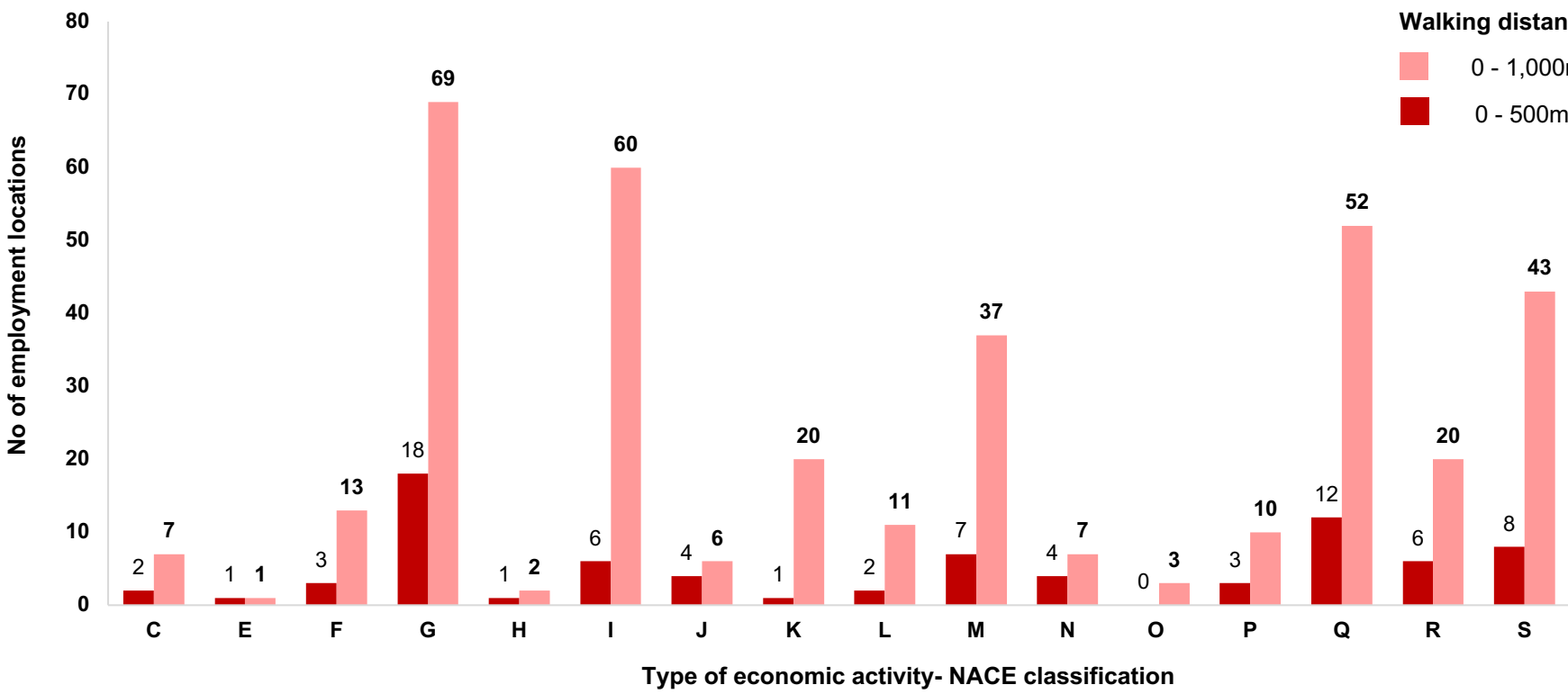
Metric distance

- 500 – 1,000 m
- 0 – 500 m

● Proposed access to site (catchment origin)
● Railway station
■ Site

Access to employment locations

Type of economic activity



The predominant type of economic activity within 500m from the site is G - Wholesale and Retail Trade followed by Q - Human, Health and Social Work Activities and S - Other Service Activities.

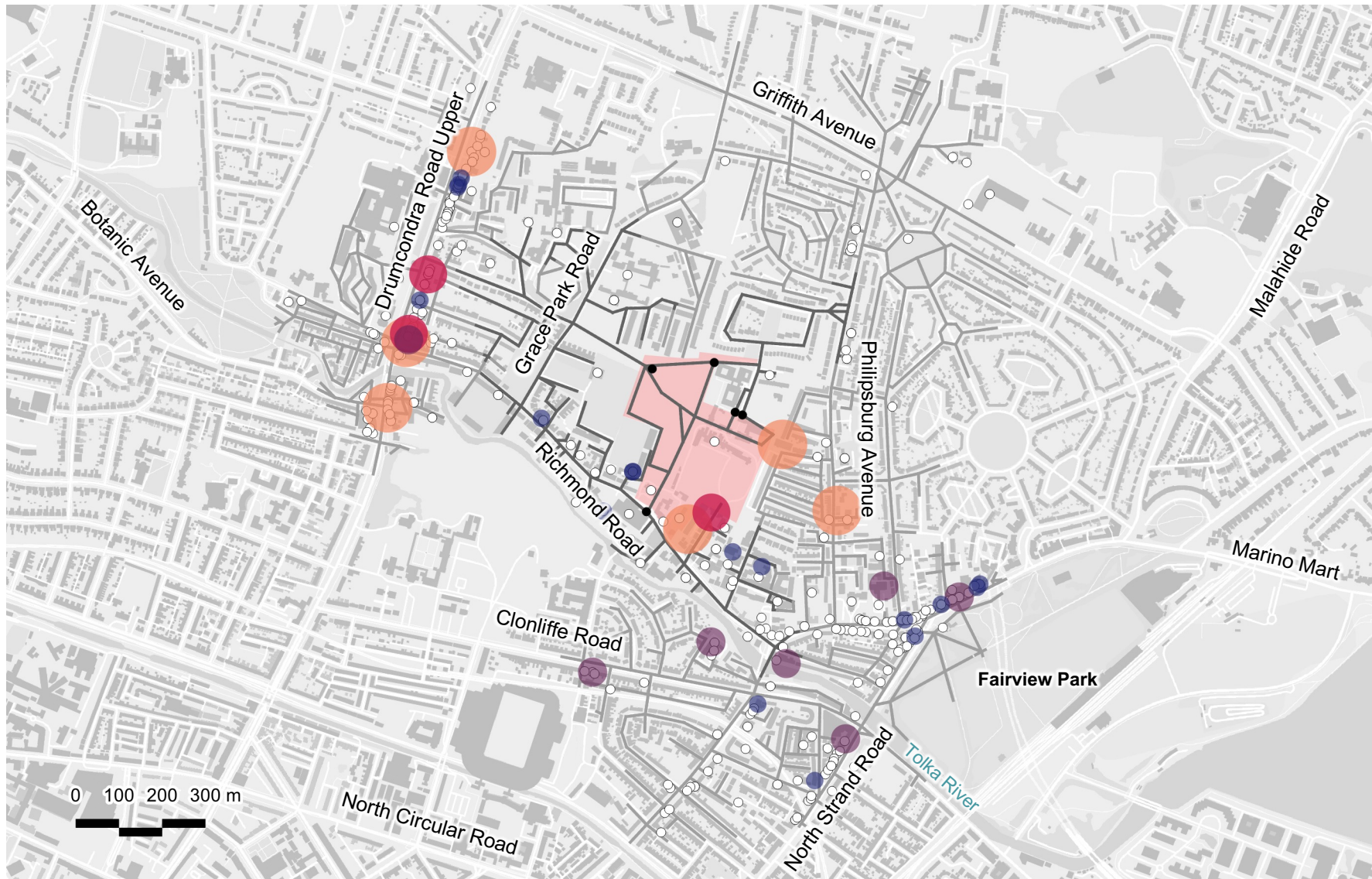
Within 1,000m catchment from the site, the predominant type of economic activity is G - Wholesale and Retail Trade followed by I - Accommodation and Food Service Activities, Q - Human, Health and Social Work Activities, S - Other Service Activities, and M - Professional, Scientific and Technical Activities.

- NACE**
(Nomenclature of Economic Activities in EU)
- C:** Manufacturing
 - E:** Water Supply; Sewerage, waste, management and remediation activities
 - F:** Construction
 - G:** Wholesale and Retail Trade
 - H:** Transportation and Storage
 - I:** Accommodation and Food Service Activities
 - J:** Information and communication
 - K:** Financial and Insurance Activities

- L:** Real Estate Activities
- M:** Professional, Scientific and Technical Activities
- N:** Administrative and Support Service Activities
- O:** Public Administration and Defence; Compulsory Social Security
- P:** Education
- Q:** Human Health and Social Work Activities
- R:** Arts, Entertainment and Recreation
- S:** Other Service Activities

¹ Data Source
GeoDirectory,
Business address, NACE classification and
number of employees
GeoAddress Online Dataset #14-02-2023
1549768457.xlsx
<https://www.geodirectory.ie>

Access to employment locations Number of employees



The data for the number of employees was not available for all employment locations around the site. The analysis of the available data subset showed that there is a range of business sizes around the site. There is at least 1 employment location of more than 100 employees within 500m from the site and at least 6 such employment locations within 1,000m.

No. of employees¹

- Data not available
- 0 to 10
- 10 to 30
- 30 to 100
- 100+

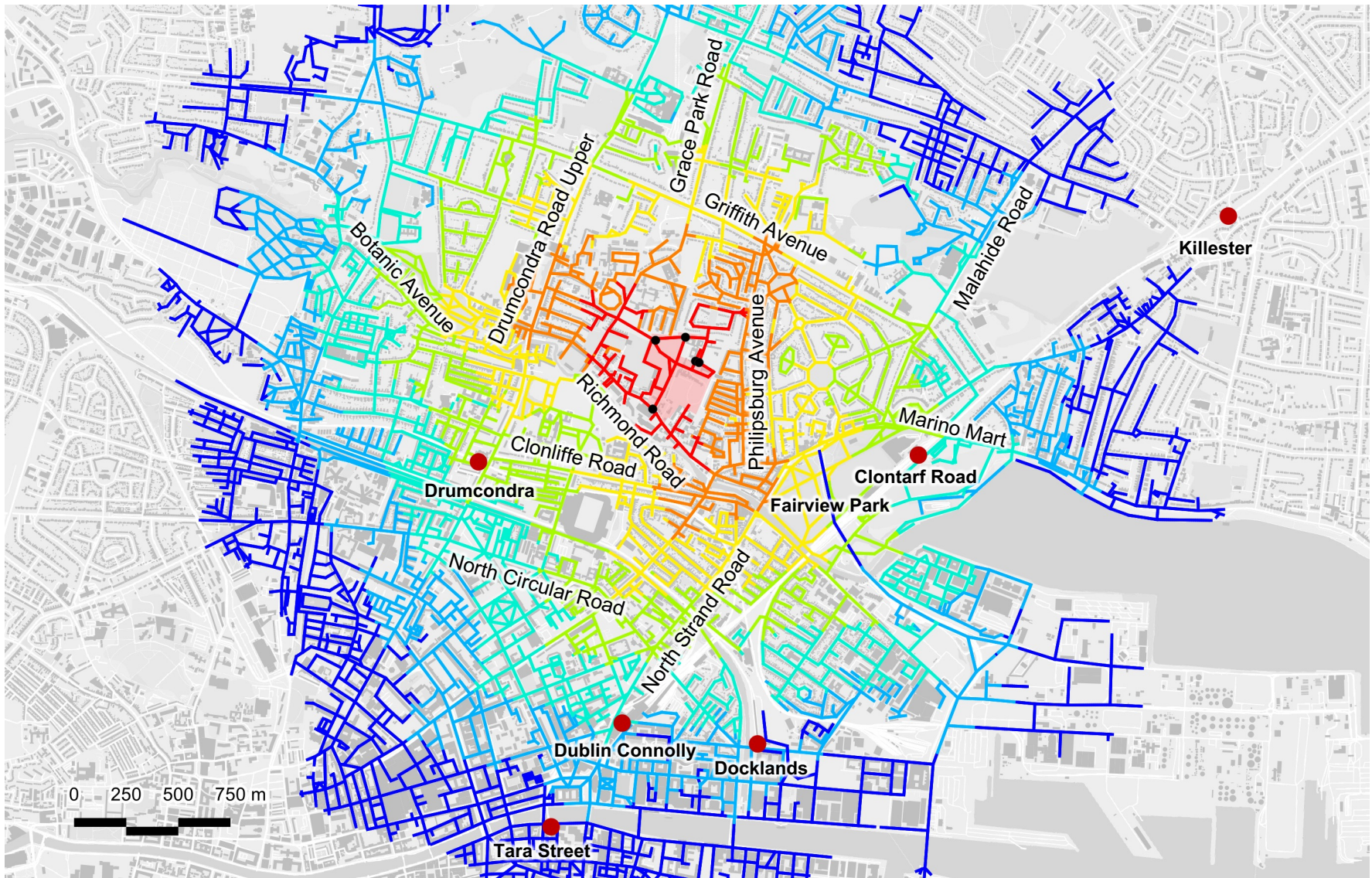
¹ Data Source

GeoDirectory,
Business address, NACE classification and
number of employees
GeoAddress Online Dataset #14-02-2023
1549768457.xlsx
<https://www.geodirectory.ie>

Metric distance

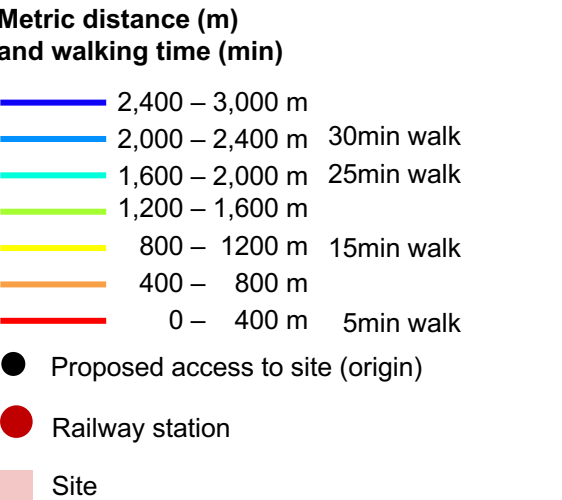
- 500 – 1,000 m
- 0 – 500 m
- Proposed access to site (catchment origin)
- Site

Access to public transport interchanges and other public transport nodes

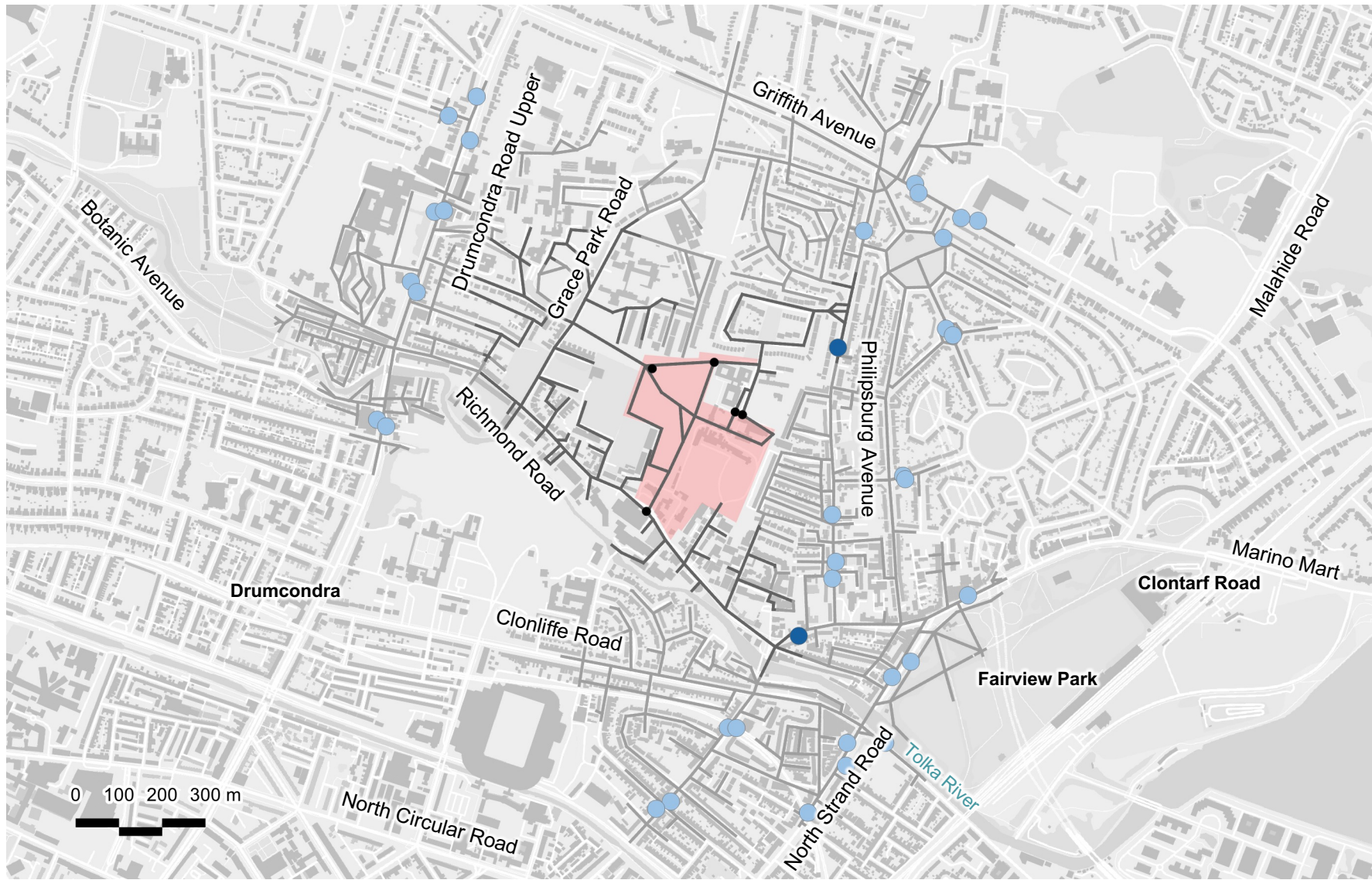


The site is not within 500m and 1,000m of a public transport interchange. However, Clontarf Rd, Drumcondra and Dublin Connolly Station are within 18.5-23.5min walk from the site. Docklands and Tara Street are just above a 30min walk from the site.

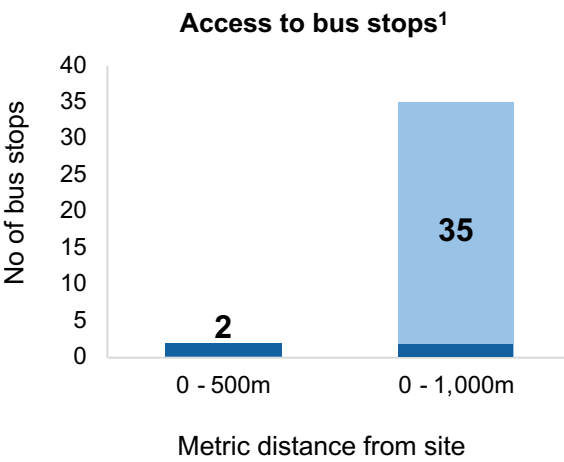
Station	Metric distance from the site (m)	Walking time (min)
Drumcondra	1,469	18.5
Clontarf Road	1,760	22
Dublin Connolly	1,873	23.5
Docklands	2,517	31.5
Tara Street	2,587	32



Access to public transport Bus stops

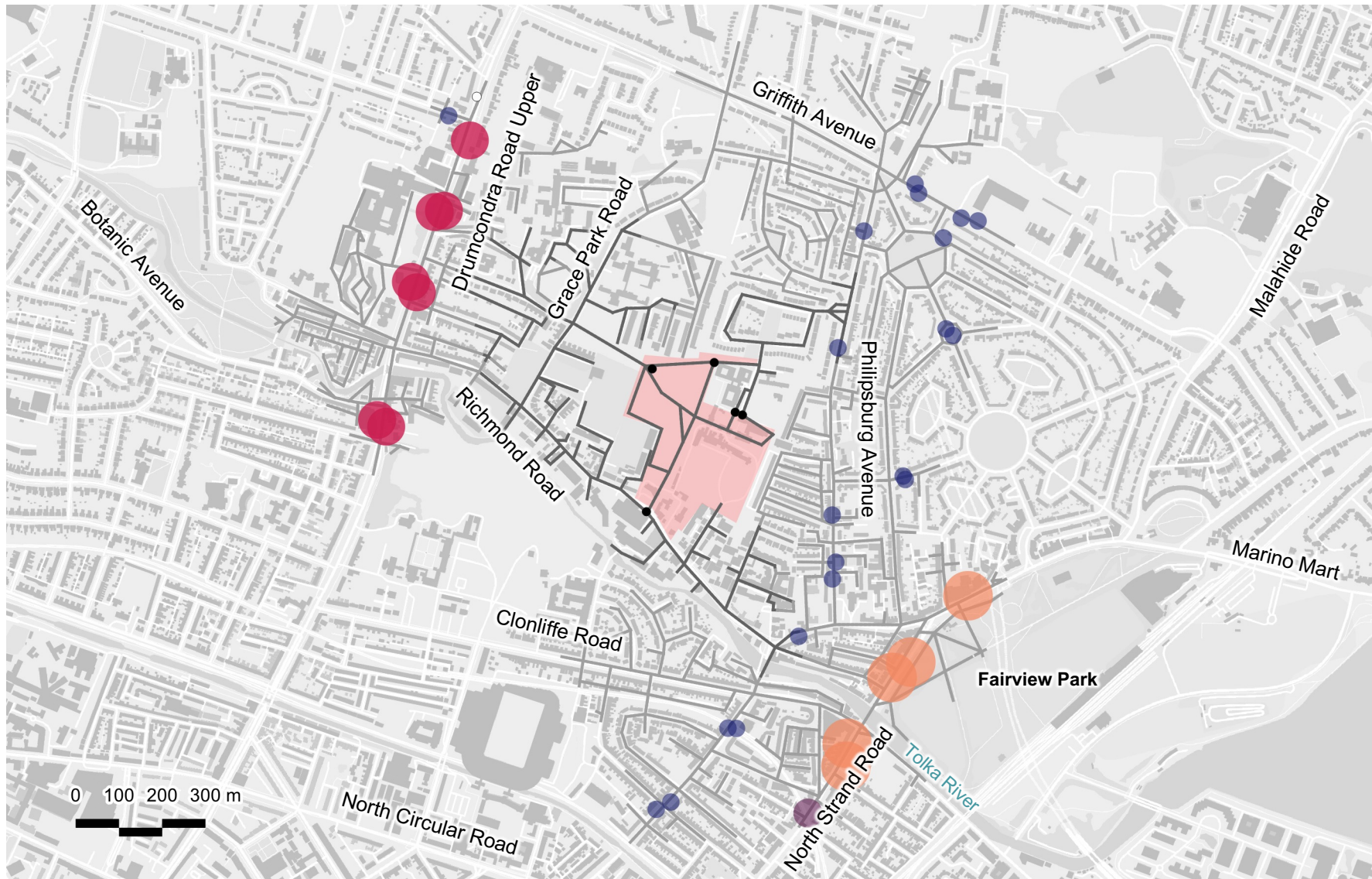


There is a significant number of bus stops within 500 and 1,000m from the site. 2 bus stops are within 500m and 35 bus stops within 1,000m.



- ¹ Data Source**
OSM data, Google maps and client team
- Metric distance**
- 500 – 1,000 m
 - 0 – 500 m
- Proposed access to site (catchment origin)
- Site

Access to public transport Bus stops Number of bus routes



There is a significant number of bus routes around the site, mainly on Drumcondra Road Upper and on Fairview/ North Strand Road.

No. of bus routes¹

- Data not available
- 1
- 2 to 5
- 6 to 10
- > 10

¹ Data Source

OSM data, Google maps and client team

Metric distance

- 500 – 1,000 m
- 0 – 500 m
- Proposed access to site (catchment origin)
- Site