

Submission on Stage 5 Proposed Amendments



Draft Wicklow County Development Plan 2022 – 2028

On behalf of:

Dunmoy Properties Limited

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1 Introduction

We, Brock McClure Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin are instructed by our client **Dunmoy Properties Limited, The Station, Shankill, Co. Dublin** to make this submission to Wicklow County Council in response to the proposed Stage 5 Amendments to the Draft Wicklow County Development Plan 2022-2028, which are currently on public display.

2 Client's Applications

These comments are made in respect of our client's developments and any future development proposals at:

- Blessington
- Bray Town Centre

They remain very concerned regarding the implications of this proposed change in policy on the viability of their development proposals within the County.

3 Submission on Amendments

Our client specifically wishes to comment on the following items:

Amendment V1-17 – Section 6.4 Housing Objectives:

CPO 6.X The sale of all developments of residential units, whether houses, duplexes or apartments, to commercial institutional investment bodies shall be prohibited.

We strongly object to proposed amendment V1-17 Objective CPO 6.X and request that this amendment is not adopted in the Wicklow County Development Plan 2022-2028.

We submit that the proposed amendment is contrary to National Policy (Housing for All) and the Apartment Guidelines as follows:

Housing For All – A New Housing Plan for Ireland

Housing for Ireland – A New Housing Plan for Ireland clearly outlines the following:

- **Section 3 (P77)** – “Private sector housing will be funded through the domestic banking sector and State financial agencies. Recourse to international capital investment will be supported through proactive engagement with international institutional investors and others”.
- **Section 3.6.5 Secure Non State Financing** – “Institutional investment in the residential sector will reduce reliance on bank funding for development; this is important in building broader capital markets for housing development. There is an increasing recognition of the importance attributed by investors to achieving positive environmental and social impacts on a sustainable basis; housing is well placed to attract sustainable and ethical financing from investors with strong environmental, social and governance standards. The Department of Finance will lead communication and engagement with institutional investors, including through tradeshow events, to communicate policies and encourage appropriate investment in residential accommodation in Ireland”.
- **Housing Policy objective 18.8** – “Lead communication and engagement with institutional investors, including tradeshow events, to communicate policies and encourage sustainable investment in residential accommodation”.



- **Section 3 (P24)** – “The overall investment required to build an average of 33,000 homes per year is estimated at €12bn. The domestic banking sector, international capital and State financial agencies will provide the essential finance to meet this requirement”

The above points as outlined in text and policy within the Housing For All document clearly demonstrate that it is a national objective to continue engagement with institutional investors throughout the lifetime of the Housing for All Plan to aid with the delivery of the required 33,000 homes per year in Ireland. The proposed amendment V1- 17 to the Draft Wicklow County Development Plan 2022-2028 is directly contradictory of National Policy and will have a detrimental impact on the required rollout of new houses in Wicklow to meet national housing targets as funding options for new projects will be extremely limited.

Design Standards for New Apartments – Guidelines for Planning Authorities

The Design Standards for New Apartments document recognises the importance of the role of investment bodies in providing build to rent apartment schemes. Section 5.3 of the guidelines outlines the following regarding the ownership of BTR apartment schemes:

“Ownership and management of BTR developments is usually carried out by a single entity that invests in the project as a long term commercial rental undertaking. This critically means that individual residential units within the development are not sold off separately for private ownership and/or subsequent sub-letting individually”.

Build to Rent apartments are described in the Apartment Guidelines in section 5.1 as:

“Larger-scale apartment developments that typically include several hundred units, that are designed and constructed specifically for the needs of the rental sector are a prominent feature of housing provision in many countries. 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 here 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”.

We submit that the proposed amendment V1 -17 to the Draft Wicklow County Development Plan 2022-2028 would essentially represent a ban on build to rent development in Wicklow. The ban of sale of residential units to institutional investment bodies as proposed would deter international funders from investing in housing in Wicklow and slow down the rollout of residential units in the county to meet the requirements outlined in the government Housing For All document, as funding options for new development would be limited.

We request that amendment V1-17 is removed in full.

Amendment V3 – 126 – Section 3.1.4 Open Space:

- Within apartment developments, private and communal amenity space shall be provided in accordance Design Standards for new Apartments (DSFNA) (2018) **as amended and as may be amended in the future**. Care should be taken to ensure that such places receive adequate sunlight and meet the highest safety standards. The front wall of balconies should be made from opaque material and be at least 1m in height.
- Dwellings (~~including own door duplexes~~) shall generally be provided with private open space at the following **minimum** rates:

House size	Minimum private open space
1-2 bedrooms	50sqm
3+ bedrooms	60-75sqm

Own door duplexes shall generally be provided with private open space at a minimum rate of 10sqm per bedroom.

It will be expected that private open space provided will exceed these standards whenever possible and such minimum standards will only be acceptable for up to 50% of the units in any development.

We strongly object to proposed amendment V3 -126 – Section 3.1.4 Open Space and request that this amendment is not adopted in the Wicklow County Development Plan 2022-2028.

We submit that the proposed requirement to provide own door duplex units with private open space at a minimum rate of 10 sq.m per bedroom will make this unit type redundant as a viable option for development.

Currently the Design Standards for New Apartments – Guidelines for Planning Authorities lists the requirement for private amenity space in apartment units as follows in Appendix 1:

Studio	4 sq m
One bedroom	5 sq m
Two bedrooms (3 person)	6 sq m
Two bedrooms (4 person)	7 sq m
Three bedrooms	9 sq m

Should the proposed amendment V3 -126 be adopted, the requirement for private open space would be as follows for duplex apartment units in County Wicklow:

- One bedroom – 10 sq.m
- Two bedroom – 20 sq.m
- Three bedroom – 30 sq.m

We submit that these areas of open space will be fundamentally unachievable within duplex schemes due to the nature of duplex typology apartments which generally feature a larger 2 storey own door unit over a smaller single storey unit at ground floor level. Private open space for the larger 2 storey unit is generally provided at 1st floor level as a terrace.

If the floor area of a 2-bedroom ground floor single storey apartment unit is 80 sq.m and the floor area of the duplex unit above is 120 sq.m (60 sq.m per floor), this means that there will be a 20sq.m area extending to the rear of the development at first floor level for a terrace to be provided.

As per the Apartment Guidelines this terrace area would exceed the required 9 sq.m for private amenity space for three-bedroom units by 11 sq.m. However, should the proposed amendment V3 – 126 to the Draft Wicklow County Development Plan 2022-2028 be adopted, this terrace of 20 sq.m would fall short of the requirement for 30 sq.m of private open space for 3-bedroom units by 10 sq.m.

We submit that this gap in standards between the requirements set out in the Apartment Guidelines and the Draft Wicklow County Development Plan 2022-2028 would mean that in principle, duplex apartments



of this type remain viable nationwide but could not be implemented within County Wicklow if the amendment is adopted. This would restrict the future development of an in-demand unit type within the jurisdiction of Wicklow County Council.

We request that amendment V3-126 is removed in full.

4 Conclusion

Amendment V1-17 – Section 6.4 Housing Objectives

The proposed amendment V1- 17 which restricts the sale of residential developments to commercial institutional investment bodies directly contradicts National Policy and will have a detrimental impact on the required rollout of new houses in Wicklow to meet national housing targets as funding options for new projects will be extremely limited. We request that this amendment is removed.

Amendment V3 – 126 – Section 3.1.4 Open Space

We submit that the proposed requirement to provide own door duplex units with private open space at a minimum rate of 10 sq.m per bedroom will make this unit type redundant as a viable option for development. We request that this amendment is removed.

We trust the information contained in this submission will be carefully considered by the Planning Authority in their assessment of the Material Amendments to the Draft Plan.

We, Brock McClure, as agents acting for our client Dunmoy Properties Limited, request that all correspondence be directed to this office at 63 York Road, Dun Laoghaire, Co. Dublin.