



Comhairle Cathrach  
Bhaile Átha Cliath  
**Dublin City Council**

## **Variation (No. 5)**

**Of the**

**Dublin City Development Plan**

**2022-2028**

## VARIATION (NO. 5) OF THE DUBLIN CITY DEVELOPMENT PLAN 2022 – 2028

**RE: To make a technical update to the 2022 – 2028 Dublin City Development Plan in relation to ‘Build-To-Rent’ (BTR) accommodation following the publication of the guidelines ‘Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, DHLGH, 2023, with transitional arrangements.**

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### **The Variation:**

The City Council resolved to make Variation No. 5 of the Dublin City Development Plan 2022-2028 at its meeting on the 8<sup>th</sup> April 2024. Variation No. 5 is effective from 8<sup>th</sup> April 2024. Variation No. 5 varies the Dublin City Development Plan 2022-2028 as follows:

**Part A: A technical update in relation to ‘Build-To-Rent’ (BTR) accommodation on foot of the publication of Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, DHLGH, 2023.**

**Part B: Insert new Appendix 19 into Volume 2: Appendices of the Dublin City Development Plan 2022 – 2028 containing transitional arrangements for Build-To-Rent accommodation proposals that are subject to consideration within the planning system on or before 21st December 2022.**

### **Purpose of the Variation:**

The purpose of the variation is to make a technical update in relation to ‘Build-To-Rent’ (BTR) accommodation having regard to and ensuring compliance with Section 28 Guidelines as set out in DHLGH document ‘Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities 2023 including transitional arrangements.

### **Environmental Determinations**

The Variation was screened as part of the processes for Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA).

A Strategic Environmental Assessment (SEA) Screening Report on the Variation was prepared and a determination was made that a full SEA is not required to be undertaken. The SEA Screening Report and Determination is available as a separate document.

An Appropriate Assessment (AA) Screening Report on the Variation was prepared and this is presented as a separate document. The Appropriate Assessment (AA) Conclusion and Determination is that Variation No. 5 does not require an Appropriate Assessment or the preparation of a Natura Impact Report (NIR).

# Variation No. 5 of the Dublin City Development Plan 2022 - 2028

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## Table of Contents, Volume 1

Delete the following text from the Table of Contents in Volume 1 as follows:

Delete:

15.10 Build to Rent Residential Development (BTR).....602

## Chapter 5: Quality Housing and Sustainable Neighbourhoods

Under Section 5.5.7 Specific Housing Typologies, amend the second subtitle heading as follows:

Delete:

Build to Rent (BTR) and Shared Accommodation

Insert:

Shared Accommodation

Under the new subtitle 'Shared Accommodation' (Section 5.5.7 Specific Housing Typologies) amend the second sentence of Paragraph 1 as follows:

Delete:

The 'Design Standards for New Apartments - Guidelines for Planning Authorities' were updated in 2020 and aim to enable a mix of apartment types, make better provision for building refurbishment and infill schemes and address the emerging Build to Rent and Shared Accommodation sectors.

Insert

The 'Design Standards for New Apartments - Guidelines for Planning Authorities' were updated in 2020 and again in 2022 and 2023 and aim to enable a mix of apartment types, make better provision for building refurbishment and infill schemes and address the Build to Rent and Shared Accommodation sectors.

Under the new subtitle 'Shared Accommodation' (Section 5.5.7 Specific Housing Typologies) insert a sentence at the end of the first paragraph:

Insert:

The 2022/23 technical update to the Design Standards for New Apartment Guidelines no longer identify Build to Rent accommodation as a distinct housing typology which requires separate guidance / design standards.

Under the new subtitle 'Shared Accommodation' (Section 5.5.7 Specific Housing Typologies) and after the first paragraph, delete the next 4 paragraphs and Policies QHSN40, QHSN41 and QHSN42 as follows:

Delete:

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.

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 and 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. 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,
- the household tenure and housing type of existing housing stock in the approximate vicinity (within a 1km radius) of the site,
- and the proximity of the proposal to high capacity urban public transport stops and interchange (such as DART, Luas and BusConnects).

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. 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.

### It is the Policy of Dublin City Council:

#### **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.

**QHSN40**

## It is the Policy of Dublin City Council:

<b>QHSN41</b>	<b>Built to Rent Accommodation</b> To discourage BTR Accommodation schemes of less than 100 units due to the need to provide a critical mass of accommodation to provide a meaningful provision of communal facilities and services. Smaller BTR accommodation schemes with less than 100 units will only be considered in exceptional circumstances and where a detailed justification is provided.
<b>QHSN42</b>	<b>Built to Rent Accommodation</b> 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.

### Remove Policy QHSN44 and replace with updated Policy QHSN44:

Delete:

**Build to Rent/Student Accommodation/Co-living Development**

It is the policy of DCC to avoid the proliferation and concentration of clusters of build to rent/student accommodation/co-living development in any area of the city.

Insert:

**Student Accommodation/Co-living Development**

It is the policy of DCC to avoid the proliferation and concentration of clusters of student accommodation/co-living development in any area of the city.

## Chapter 14 Land Use Zoning

Delete the third paragraph of Section 14.7.1 Sustainable Residential Neighbourhoods – Z1

Delete:

In order to achieve a sustainable tenure mix in neighbourhoods, the Build to Rent residential typology is predominantly in the open for consideration category.

Under Section14.7.1, [Z1 – Open for Consideration Uses](#), delete the following:

Delete:

Build to Rent residential,

Under Section14.7.2, [Z2 – Open for Consideration Uses](#), delete the following:

Delete:

Build to Rent residential,

Under Section14.7.4, [Z4 – Open for Consideration Uses](#), delete the following:

Delete:

Build to Rent residential,

Under Section14.7.5, [Z5 – Open for Consideration Uses](#), delete the following:

Delete:

Build to Rent residential,

Under Section14.7.10, [Z10 – Open for Consideration Uses](#), delete the following:

Delete:

Build to Rent residential,

Under Section14.7.12, [Z12 – Open for Consideration Uses](#), delete the following:

Delete:

Build to Rent residential,

Under Section14.7.13, [Z14 – Permissible Uses](#), delete the following:

Delete:

Build to Rent residential,

## Chapter 15      Development Standards

Under Section 15.8 Residential Development, in the first paragraph, delete the reference to 'Build to Rent' in the second sentence:

Delete:

This section sets out the general requirements for residential development followed by more specific guidance for apartments, Build to Rent, student accommodation and houses.

Insert

This section sets out the general requirements for residential development followed by more specific guidance for apartments, student accommodation and houses.

Under Section 15.9.1 Unit Mix, in the last paragraph delete the last sentence.

Delete:

For clarity, in accordance with SPPR 8, the unit mix requirement for the North Inner City and Liberties Sub-City Areas does not apply to units that are designed to a BTR standard.

Under Section 15.9.2 Unit Size / Layout, delete reference to BTR accommodation in 4<sup>th</sup> paragraph

Delete:

The majority of all apartments in any proposed scheme of 10 or more apartments (excluding Build to Rent accommodation) shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not included as units that exceed the minimum by at least 10%).

Insert:

The majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2 or 3 bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not included as units that exceed the minimum by at least 10%).



Delete all of Section 15.10 Build to Rent Residential Developments (BTR) including sub sections 15.10.1 and 15.10.2 as follows:

Delete:

#### 15.10 Build to Rent Residential Developments (BTR)

“Build to Rent” (BTR) refers to 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. Recent emerging trends would indicate that the dominance of BTR in large schemes can be to the detriment of standard designed apartment units. Dublin City Council will consider “Built to Rent” developments in specific locations as follows:

- Within 500 metre walking distance of significant employment locations.
- Within 500m 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 a sustainable mix of tenure and long-term sustainable communities, a minimum of 60% of standard designed apartments will be required in such instances.

Please refer to section 5.5.7 of this city development plan – Policy QHSN40.

Furthermore, whilst BTR is considered to be an integral part in achieving an appropriate mix of housing in the right locations, there will be a presumption against the proliferation and over concentration of Build to Rent development in any one area (refer to Section 5.5.7 of Chapter 5 Quality Housing and Sustainable Neighbourhoods). Applications for “Build to Rent” 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 over concentration of one housing tenure in a particular area.
- 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.

##### 15.10.1 Design Standards

The Sustainable Urban Development Design Standards for New Apartments set out specific planning policy requirements for “Build to Rent” developments. SPPR7 refers to the provision of resident support facilities (laundry, concierge, management

facilities etc.) and resident services and amenities (sports facilities, resident lounge, function rooms, co-working spaces etc.).

Whilst the guidelines do not provide for a quantitative standard residential support facilities and resident services and amenities, a general guideline of 3 sq. m. per person is recommended. This will be assessed on a case by case basis where the applicant can demonstrate a high standard of services and facilities.

SPPR8 refers to specific relaxations that can be applied to BTR scheme which differentiate BTR schemes from standard residential developments.

SPPR8 (ii) states that flexibility can be applied to the provision of storage space, private amenity space and communal space within a scheme at the discretion of the planning authority.

There is a general presumption against excessive derogation of these requirements, in particular, private amenity space. Where derogations of private amenity space are sought, there will be an onus on the applicant to demonstrate that the quality of the unit is of a higher standard, e.g. in excess of the minimum floor area, contains unique design features and that the loss/reduction of private amenity is compensated within the communal amenity provision, e.g. if a unit requires 5 sq. m. of private amenity space, this quantum should be offset to provide for an additional 5 sq. m. communal amenity space.

Dublin City Council will seek to ensure a high level of amenity is provided within BTR schemes. All applications should seek to demonstrate compliance with the relevant standards for storage, private and communal open space as set out in Appendix 1 of the Sustainable Urban Housing: Design Standards for New Apartments.

In all cases, the onus will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity.

#### 15.10.2 Communal and Public Open Space

All Built to Rent developments will be required to provide for the same quantum of external communal open space and public open space as set out for standard apartment developments, see Section 15.6.12 and 15.8.6.

## Glossary and Acronyms

Under Glossary, and under the term 'Build to Rent Accommodation; delete the last line of the explanation:

Delete:

**Build to Rent Residential Accommodation:** 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. (see also Section 5.2 of the DHLG&H's Section 28 Guidelines, "Sustainable Urban Housing: Design Standards for new Apartment's" (2020).

Insert:

**Build to Rent Residential Accommodation:** 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.

## Volume 2 Appendices, Table of Contents

After Appendix 18 insert new Appendix 19:

Insert:

Appendix 19: Transitional Arrangements for Build-To-Rent Accommodation proposals.....428

## Volume 2 Appendices, Appendix 14: Statement Demonstrating Compliance with Section 28 Guidelines

Under Table 2 - Implementation of SPPRs from DLPLG (2018) Sustainable Urban Housing, delete 'Specific Planning Policy Recommendations - SPPR 7: BTR Development and SPPR 8 and text in opposite 'Implementation' column:

Delete:

<b>SPPR 7:</b> BTR development	Chapter 15 Development Standards, which sets out the relevant standards relating to BTR developments, complies with SPPR7.
<b>SPPR 8:</b> Proposals that qualify as specific BTR development	Chapter 15 Development Standards, which sets out the relevant standards relating to BTR developments, complies with SPPR8.

## Volume 2 Appendices, Appendix 15: Land Use Definitions

Under 'Land Use Definitions' alter the land use definition of - 'Build to Rent Residential Accommodation' - by deleting the text in brackets and brackets at the end of the definition:

Delete:

Build to Rent Residential Accommodation

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 (see also section 5.0 of the DHPLG Section 28 Guidelines, Sustainable Urban Housing: Design Standards for new Apartments (2020)).

Insert:

Build to Rent Residential Accommodation

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.

## **Volume 2 Appendices**

**Insert new Appendix 19 after Appendix 18 as follows:**

Insert:

### **Appendix 19: Transitional Arrangements for Certain Development Proposals for or including Build-To-Rent Accommodation**

#### **1.0 Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, DHLGH, 2023**

Build-To-Rent (BTR) development was established as a separate class of development for planning purposes, arising from *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities*, as published in 2018 and updated in 2020.

For the purposes of the planning system the Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, DHLGH, 2023 no longer identify Build to Rent (BTR) accommodation as a specific housing typology which require specific guidance / design standards. A technical update in relation to 'Build-To-Rent' (BTR) accommodation has been made to the development plan.

#### **2.0 Transitional Arrangements**

In amending the apartment guidelines transitional arrangements were put in place to allow BTR proposals at formal application / appeal stage or at formal pre-application stage on or before 21<sup>st</sup> December 2022 to be considered with reliance to the 2020 guidelines (see paragraphs 5.10 and 5.11 of the 2023 guidelines).

To comply with the 2023 guidelines, under these transitional arrangements relevant BTR proposals will be considered and decided in accordance with (1) the 2020 Guidelines and, (2) the interim development plan BTR policies, objectives and standards as set out below.

A reference to proposed Build-To-Rent accommodation below in sub sections 3.1 – 3.3 is a reference to BTR proposals as per paragraphs 5.10 and 5.11 of the 2023 guidelines. New BTR accommodation development proposals made after this date will not be assessed under the 2020 Guidelines or these interim development plan policies, objectives and standards.

#### **3.0 Build-To-Rent Accommodation**

##### **3.1 Specific Housing Typologies - Build to Rent (BTR) Accommodation**

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

Furthermore, applications for BTR schemes are 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 and 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. 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,
- the household tenure and housing type of existing housing stock in the approximate vicinity (within a 1km radius) of the site,
- and the proximity of the proposal to high capacity urban public transport stops and interchange (such as DART, Luas and BusConnects).

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. BTR schemes of less than 100 units will generally not be supported. The concept of Build 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.

**It is the Policy of Dublin City Council:**

**QHSN40(a)**

**Build to Rent Accommodation**

To facilitate the provision of Build to Rent (BTR) development proposals which, on or before 21<sup>st</sup> December 2022, were at formal application / appeal stage or at formal pre-application stage (as per paragraphs 5.10 and 5.11 of the 2023 apartment guidelines) 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, as updated.

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.

**QHSN41(a)**

**Build to Rent Accommodation**

To discourage BTR Accommodation schemes of less than 100 units due to the need to provide a critical mass of accommodation to provide a meaningful provision of communal facilities and services. Smaller BTR accommodation schemes with less than 100 units will only be considered in exceptional circumstances and where a detailed justification is provided.

## It is the Policy of Dublin City Council:

<b>QHSN42(a)</b>	<b>Build to Rent Accommodation</b> 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.
<b>QHSN44(a)</b>	<b>Build to Rent</b> It is the policy of DCC to avoid the proliferation and concentration of clusters of build to rent development in any area of the city.

### 3.2 Land Use Zoning

The following should be read in conjunction with Chapter 14 of Volume 1: Written Statement of the Development Plan (Land Use Zoning) and with Maps A to H of the Plan.

In order to achieve a sustainable tenure mix in neighbourhoods, the Build-To-Rent residential typology is predominantly in the open for consideration category.

In brief Build-To-Rent residential is open for consideration as a transitional arrangement only as set out in QHSN40(a) under Land Use Zoning Objectives Z1, Z2, Z4, Z5, Z10, Z12.

Build-To-Rent residential is a permissible use under Land Use Zoning Objective Z14 only as a transitional arrangement as described in QHSN40(a).

### 3.3 Development Standards for Build to Rent

This section sets out specific guidance for Build to Rent.

For clarity, in accordance with SPPR 8, the unit mix requirement for the North Inner City and Liberties Sub-City Areas does not apply to units that are designed to a BTR standard.

#### 3.3.1 Build to Rent Residential Developments (BTR)

“Build to Rent” (BTR) refers to purpose build residential accommodation and associated amenities build specifically for long term rental that is managed and



serviced in an institutional manner by an institutional landlord. Recent emerging trends would indicate that the dominance of BTR in large schemes can be to the detriment of standard designed apartment units. Dublin City Council will consider “Build to Rent” developments in specific locations as follows:

- Within 500 metre walking distance of significant employment locations.
- Within 500m 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 a sustainable mix of tenure and long-term sustainable communities, a minimum of 60% of standard designed apartments will be required in such instances.

Please refer to Policy QHSN40(a) above.

Furthermore, whilst BTR is considered to be an integral part in achieving an appropriate mix of housing in the right locations, there will be a presumption against the proliferation and over concentration of Build to Rent development in any one area. Applications for “Build to Rent” 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 over concentration of one housing tenure in a particular area.
- 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.

### 3.3.2 Design Standards

The Sustainable Urban Development Design Standards for New Apartments set out specific planning policy requirements for “Build to Rent” developments. SPPR7 refers to the provision of resident support facilities (laundry, concierge, management facilities etc.) and resident services and amenities (sports facilities, resident lounge, function rooms, co-working spaces etc.).

Whilst the guidelines do not provide for a quantitative standard residential support facilities and resident services and amenities, a general guideline of 3 sq. m. per person is recommended. This will be assessed on a case by case basis where the applicant can demonstrate a high standard of services and facilities.

SPPR8 refers to specific relaxations that can be applied to BTR scheme which differentiate BTR schemes from standard residential developments.

SPPR8 (ii) states that flexibility can be applied to the provision of storage space, private amenity space and communal space within a scheme at the discretion of the planning authority.

There is a general presumption against excessive derogation of these requirements, in particular, private amenity space. Where derogations of private amenity space are sought, there will be an onus on the applicant to demonstrate that the quality of the unit is of a higher standard, e.g. in excess of the minimum floor area, contains unique design features and that the loss/reduction of private amenity is compensated within the communal amenity provision, e.g. if a unit requires 5 sq. m. of private amenity space, this quantum should be offset to provide for an additional 5 sq. m. communal amenity space.

Dublin City Council will seek to ensure a high level of amenity is provided within BTR schemes. All applications should seek to demonstrate compliance with the relevant standards for storage, private and communal open space as set out in Appendix 1 of the Sustainable Urban Housing: Design Standards for New Apartments.

In all cases, the onus will be on the project proposer to demonstrate the overall quality of the facilities provided and that residents will enjoy an enhanced overall standard of amenity.

### 3.3.3 Communal and Public Open Space

All Build to Rent developments will be required to provide for the same quantum of external communal open space and public open space as set out for standard apartment developments, see Section 15.6.12 and 15.8.6.

**END**