

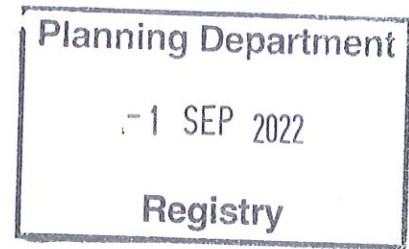
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hibernia

Development Plan Team
Planning and Property Development Department
Dublin City Council
Wood Quay,
Dublin 8



Date: 1st September 2022

Re: **Submission to Draft Dublin City Development Plan – Material Alterations Stage (2022-2028)**

Dear Sir/ Madam

Hibernia Real Estate Group Limited (Hibernia), formerly Hibernia REIT plc wish to make the following submission on the Draft Dublin City Development Plan – Material Alterations Stage.

Hibernia is currently working on a number of redevelopment opportunities in the City and believe that this submission is pertinent to ensuring the continued delivery of residential and commercial development which can drive forward regeneration and deliver on City objectives, set under the current Plan.

This submission focuses on:

1. Cultural Floorspace
 2. Build to Rent
-
1. Cultural Floorspace

Material Alteration Reference Number 12.19

Chapter 12

Section 12.5.3 Supporting Cultural Vibrancy in the City

Page: 448, Objective CUO22, add footnote

(SDRAs and Large Scale Developments)

Proposed Amendment per Material Alteration:

{*Such developments shall incorporate both cultural/arts and community uses individually or in combination unless there is an evidence base to justify the 5% going to one sector.}

It is recommended that the following amendments are made to the proposed Material Alterations (proposed additions in **red**)

Hibernia Suggested Amendment :

{*Such developments shall incorporate an area not exceeding 5% of both cultural/arts and community uses individually or in combination with internal / external floorspace unless there is an evidence base to justify up to 5% going to one sector.}

There is a strong focus on the provision of cultural and community spaces as part of large-scale redevelopment proposals.

While the intent of Development Plan proposals is understood, it is considered that the outcomes of the policies proposed are ill-conceived and will result in vacant space proliferation at ground floor level throughout the city.

It is considered Objective CU022 needs to be re-visited, in its intent to deliver 5% of internal floorspace of developments above 10,000sqm to community, arts and culture and artist workspaces. This scale of cultural floorspace is significant without a programme for ongoing financing, subvention, maintenance, and an identified list of cultural institutions that are in a position to take up the opportunity of extensive floor plates. It could result in the proliferation of cultural spaces of c. 500sqm across the city extending to c. 2-3,000sqm, in unsuitable locations and/or without the means to fund their operations.

Forward thinking providers of commercial floorspace in the City consider the need to integrate their development into the city through the provision of multi-use or flexible and public-facing spaces e.g. The Town Hall at WMQ delivered by Hibernia. This space is not considered either cultural or community, but in fact it is widely used for both purposes with an impressive curation of events held to date and planned for the future. Its delivery is considered, targeted, operationally robust and capable of supporting a wide range of user groups. Without this due consideration, a space of this nature and scale (which does not measure up to the 5% considered in the Draft Plan), would be unsustainable resulting in empty ground floor space critical to the regeneration of the city streets.

Additionally, the delivery of cultural space in unsuitable locations and formats may mean a vacancy of significant scale. In addition to financing their ongoing operations, cultural developments need to be considered in location terms for accessibility and profiling, and in space format for usability. This blanket objective negates the consideration of critical elements in the delivery of cultural and community spaces.

It is suggested that a cultural audit of the local area could be considered for particular locations, prior to the mandate to deliver potentially unwanted, unsuitable and inaccessible space, to inform where the balance between support for existing cultural and community facilities and provision of new space lies. It is considered that this would result in an effective delivery of cultural and community provision that is targeted, needed and capable of continued operation.

This is further reflected in Material Alteration Reference Number 13.5 (as per below) where it is noted that the Material Alteration includes further reference to the 5% requirement with an additional requirement of “at a minimum”. It is proposed that this Material Alteration Amendment, for the reasons set out above, is further amended as per below:

Material Alteration Reference Number 13.5

Chapter 13

Section: 13.2 Overarching Principles

Page: 467 – 469, insert New Objective SDRAO1 in section 13.2 after 1st paragraph

Proposed Amendment per Material Alteration:

Amendment:

Cultural Infrastructure: All new regeneration areas (SDRAs) and large-scale developments above 10,000 sq. m. in total area must provide at a minimum 5% community, arts and culture internal / floorspace as part of their development. See policy CUO21, Chapter 12 for further detail.

It is recommended that the following amendments are made to the proposed Material Alterations (proposed additions in red)

Hibernia Suggested Amendment:

After 1st paragraph delete existing text in section 13.2 and replace with the following text:

INTER ALIA

Cultural Infrastructure: All new regeneration areas (SDRAs) and large-scale developments above 10,000 sq. m. in total area must provide **an area not exceeding** ~~at a minimum~~ 5% community, arts and culture internal / **external** floorspace as part of their development. See policy CUO21, Chapter 12 for further detail.

2. BUILD TO RENT

Material Alteration Reference Number 5.24

Chapter 5

Section: 5.5.7 Specific Housing Typologies, subheading Build to Rent (BTR) and Shared Accommodation

Page: 186, Policy QHSN38

Proposed Amendment per Material Alteration:

Policy QHSN38 Build to Rent Accommodation

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

- ~~(Within the Inner City (i.e. within the canal ring)).~~
- Within 500 metre walking distance of a high employment area i.e. more than 500 employees per hectare.
- 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 ~~(40%)~~ {60%} of ~~(standard build-to-sell apartments)~~ {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} ~~(will be required in such instances)~~. 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} ~~(in the vicinity)~~ {1km}~~{(3km)}~~{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} ~~(regard)~~ the ~~(geographical area)~~ {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.

The above proposed Material Alteration is noted.

It is asserted that the requirement to provide 60% standard apartment designed units within a BTR residential development of over 100 units, is overly prescriptive and will restrict the delivery of high-density affordable housing in key locations of the City, as per Draft Development Plan objectives.

In addition, this policy does not consider the specific context of the proposed BTR location, which may be located within an area of traditional (build-to-sell) houses / housing, and where quality rental may be a much needed alternative form of housing, in order to ensure diversification and sustainable development of an area, introducing new population to support existing and new infrastructure and services.

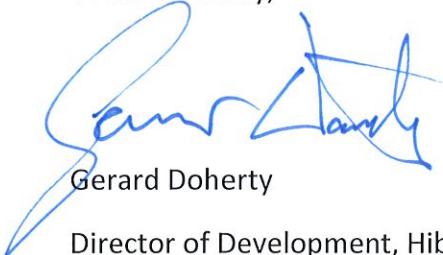
It is put forward that this requirement be omitted from Policy QHSN38.

We are broadly supportive of the content of the draft plan and our suggestions are intended to ensure the City is enhanced as a place for people to live and work in.

Addressing the housing supply issue, in accordance with national policy, is fundamentally important to Dublin and Ireland and we have concerns that some of the of the policies included in the Draft Plan will impede the delivery of much needed housing and exacerbate the current housing supply issues.

We are experienced in delivering and managing high quality, sustainable, commercial space in Dublin as evidenced from the Windmill Quarter and Cumberland Place. We look forward to delivering similarly high-quality space in the future. As can be seen from our sustainability statement of Intent, we are committed to making a positive contribution to society and we look forward to working with our customers, suppliers, communities, and sector peers to achieve common goals and provide buildings that are adaptable and resilient to climate change and that promote the health and wellbeing of their occupants and the surrounding areas. As a result of our experience in delivering and managing high quality properties and our future plans, we respectfully submit our submission in relation to the proposed material alterations above is well informed and should be taken on board.

Yours Sincerely,



Gerard Doherty

Director of Development, Hibernia Real Estate Group Limited.
