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Neasa Hourigan TD  
Leinster House  
Kildare Street  
Dublin 2

1<sup>st</sup> June 2021

(by email to minister@housing.gov.ie)

Dear Minister,

I am writing to you in relation to the overconcentration of build-to-rent in Dublin's inner city areas.

I recognise that Build-to-rent developments form a relatively small (but at the same time not insignificant) proportion of the planning applications lodged at a national level.

However overconcentration of Build-to-rent developments is an issue in my constituency of Dublin Central. The Dublin Inquirer recently published an [article](#) which stated that between 2018 and 2020 as much as 70% of housing units granted permission in Dublin City Council were build-to-rent. My own review of strategic housing developments and their applications to An Bord Pleanála in the past year in the Dublin City Council area indicates a similar number, with approximately 65% of units being build-to-rent.

I believe we need a balance with build-to-rent developments. We limit the amount of social and affordable housing in developments. We should now, at a minimum, have a percentage cap on the build-to-rent element of any site, if not an outright ban. That balance is needed for sustainable communities so they do not become dominated by rental only housing models.

On another important point, some 13% to 15% of the population has a disability and a considerable proportion of those people live in private rental situations; however the minimum requirements for spatial set-outs in build-to-rent are fundamentally in conflict with the rights of people with disabilities. A 5% variance on spatial standards means that a studio or one-bedroom apartment of 37 sq. m can be brought down to 35 sq. m. That is a tiny amount of space without any room for storage. There is no generosity in that space. We already know there is an issue in accessing

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the home adaptation grant for private rental properties. There is no likelihood that the significant proportion of the Irish population who have a disability can seriously use the 65% of build-to-rent permission in my constituency. That is the outsized impact that build-to-rent has on areas such as Dublin Central.

In November last year, the Department of Housing, Local Government and Heritage produced a welcome report on co-living developments. On foot of that report, you as Minister took the view that the number of applications and permissions was too high and decided, effectively, to ban co-living. That was the correct decision in my view.

I have a number of requests:

1. Will your Department instruct the Housing Supply Coordination Task Force for Dublin to break out standard build, build to rent, co-living and student accommodation by council in their quarterly reports. Having this data would help in understanding the magnitude of the issue.
2. Will your Department commence a review of the impact the disproportionate amount of build-to-rent developments in Dublin Central is having on:
  1. people who wish to buy houses or apartments and live in Dublin Central.
  2. people with a disability who wish to buy or rent in Dublin Central.

We must make a conscious decision about the appropriate levels and locations for this type of development because every community deserves to have quality housing.

Kind Regards,

