

Childcare Demand Audit

In respect of

**Proposed Strategic Housing Development
(Alterations to Phase 1 Residential and
Proposed Phase 2 Residential Development)**

at

**Frascati Centre, Frascati Road, Blackrock, Co. Dublin
(formerly known as Frascati Shopping Centre)**

Prepared by

John Spain Associates

On behalf of

**IMRF II Frascati Limited Partnership acting through its
general partner Davy IMRF II GP Limited**

28th August 2020



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1.0 **INTRODUCTION**

- 1.1 On behalf of the applicant, IMRF II Frascati Limited Partnership acting through its general partner Davy IMRF II GP Limited, we hereby submit this Childcare Demand Audit to An Bord Pleanála as part of a SHD planning application on a site at the Frascati Centre, Frascati Road, Blackrock, Co. Dublin (formerly known as Frascati Shopping Centre).
- 1.2 The proposal relates to alterations to the Phase 1 permission for 45 no. apartments (Reg. Ref.: D17A/0950 & ABP Ref.: 300745-18), from second to fourth floor level of the rejuvenated Frascati Centre. The proposed development also includes the provision of 57 no. additional apartments, as an extension of the Phase 1 permission, located above the existing / permitted podium car park to the north west of the centre, as a Phase 2 residential development. The subject application therefore relates to a total of 102 no. residential units.
- 1.3 The proposed unit mix is as follows:

Phase 1 (Proposed Alterations to Permitted Units- No Unit Mix Change)	Phase 2
<ul style="list-style-type: none"> • 3 no. 1 beds • 36 no. 2 beds • 6 no. 3 beds 	<ul style="list-style-type: none"> • 20 no. studios • 22 no. 1 beds • 15 no. 2 beds

- 1.4 The application site is primarily zoned for District Centre purposes within the Dun Laoghaire Rathdown Development Plan 2016-2022 with the objective *'to protect, provide for and / or improve mixed – use district centre facilities'*, and partly zoned Objective 'A- Residential', under which residential use is permitted in principle.
- 1.5 The purpose of this report is to demonstrate that it is not necessary to provide a childcare facility as part of the proposed development (which relates to alterations to 45 no. apartments (this scheme did not include a childcare facility, and the provision of 57 no. new apartments), having regard to the relevant planning policy guidelines, the quantum of 2 bed+ units proposed and having regard to existing provision in the wider area.
- 1.6 The Childcare Facility Guidelines 2001 require residential developments of 75+ units to provide 20 childcare spaces for each 75 units. However, this position is clarified in the 2018 Apartment Guidelines, which state that studios and 1 beds (as they would be unlikely to accommodate children) can be omitted from such calculations and in certain instances 2 bed units can be dismissed. Thus, the remaining 51 no. 2 bed units and 6 no. 3 beds would be below the threshold of 75 no. units requiring a minimum of 20 no. childcare spaces to be provided. Based on the requirements of the Guidelines the facility would generate a requirement for c. 15 childcare spaces ($57 / 75 = 0.76 * 20 = 15.2$). As the childcare requirement is below the minimum threshold, the non-inclusion of a childcare facility is considered reasonable for this proposed development. It is also submitted that a childcare facility which provides less than 20 no. spaces would not be commercially viable.
- 1.7 In addition, this report seeks to demonstrate, based on an audit of the existing childcare facilities serving an area of approximately 1-1.5km from the subject site, that there are sufficient facilities and capacity in the wider area to cater for the limited childcare needs that may arise from the proposed development in the future based on unit mix and projected household formation within the development.

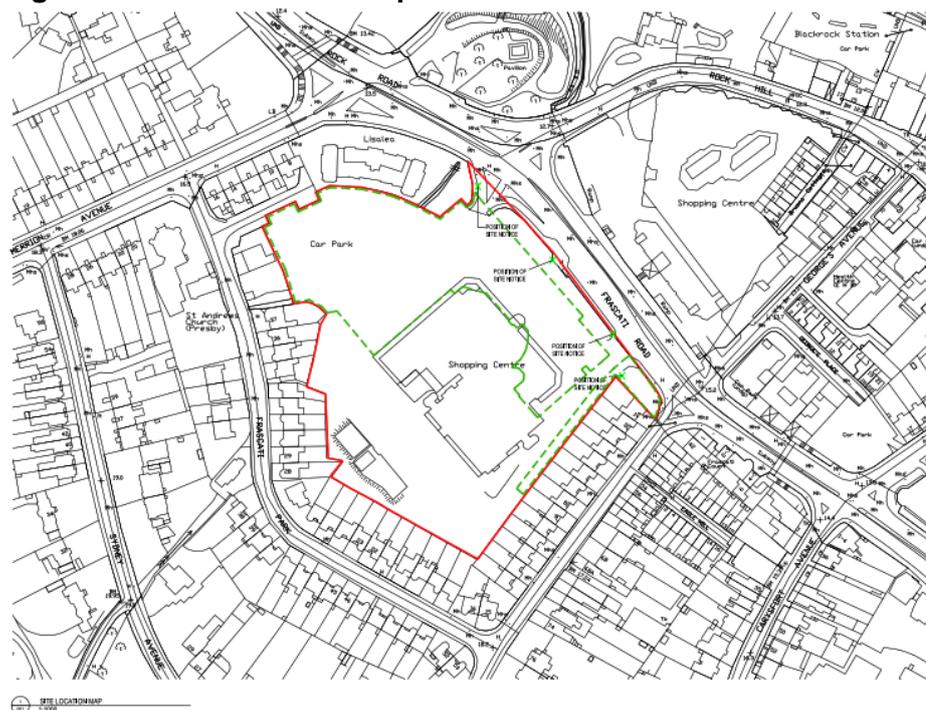
- 1.8 In the preparation of this report we contacted the Dun Laoghaire Childcare Committee. They requested that we send them details of the scheme before advising further and a copy of this report was issued. A response was not received at the date of lodgement.

2.0 **SITE CONTEXT**

- 2.1 This application for residential development relates to the Frascati Centre, Frascati Road, Blackrock, Co. Dublin, as illustrated in Figure 2.1 below. The existing shopping centre is located within the core retail area of Blackrock village as identified within the Dun Laoghaire Rathdown County Development Plan 2016–2022. The application site is zoned for District Centre purposes within the Dun Laoghaire Rathdown Development Plan 2016-2022 with the objective *'to protect, provide for and / or improve mixed – use district centre facilities'*, and partly zoned Objective 'A- Residential', under which residential use is permitted in principle.
- 2.2 The application site relates to the front and northern portion of the Frascati Centre. As illustrated on the Site Location Map and Site Layout Plan, the red line for the proposed development extends across the entire site boundary (2.67 hectares). The green line illustrates the extent of the Permitted Phase 1 (alterations proposed as part of this application) and proposed Phase 2 residential development, as illustrated in Figure 2.2 below. We refer the Board to the floorplans, elevations and sections for details of the proposed alterations to Phase 1 and the Phase 2 proposals.
- 2.3 The Frascati Centre is bound by the N31 Frascati Road to the north-east; the rear of properties on George's Avenue to the south-east; the rear of properties on Frascati Park to the west and south-west and the rear of Lisalea Apartments to the north and adjacent terrace of houses on Mount Merrion Avenue to the north-west.

Figure 2.1: Aerial View of the Frascati Centre



Figure 2.2: Site Location Map Extract

3.0 **POLICY CONTEXT**

Guidelines for Planning Authorities on Childcare Facilities (2001)

- 3.1 The “*Guidelines for Planning Authorities on Childcare Facilities*” (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations.
- 3.2 The Guideline recommend that in larger new housing estates, Planning Authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The Guidelines advise that sites should be identified for such facilities as an integral part of the pre-planning discussions.
- 3.3 For the proposed development of 102 no. units (including alterations to 45 no. permitted units and 57 no. new units), and a unit mix of 20 no. studios, 25 no. 1 beds, 51 no. 2 beds and 6 no. 3 beds, this equates to 27 no. childcare spaces ($102 / 75 = 1.36 * 20$). However, as noted below both the studio and 1 bed units can be omitted from such an assessment, resulting in the 51 no. 2 bed units and 6 no. 3 beds falling below the minimum threshold of 75 no. units requiring the provision of 20 no. childcare spaces under the 2001 Guidelines.
- 3.4 We understand that a review of the Childcare Guidelines is scheduled by the Department, predicated on the accepted view that the current guidelines are too onerous and lead to a level of childcare facilities that often exceeds market demand particularly in the long term.
- 3.5 The following definition of Childcare is included in the Guidelines:

“In these Guidelines, “childcare” is taken to mean full day-care and sessional facilities and services for pre-school children and school-going children out of school hours. It

includes services involving care, education and socialisation opportunities for children. Thus, services such as pre-schools, naíonraí (Irish language playgroups), day-care services, crèches, playgroups, and after-school groups are encompassed by these Guidelines. Conversely childminding, schools, (primary, secondary and special) and residential centres for children are not covered by these Guidelines.”

Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities (2018)

3.6 The recommendations of the 2001 Childcare Facility Guidelines, outlined above, must be considered in the context of the Sustainable Urban Housing: Design Standards for New Apartments 2018, i.e. more recent Section 28 Ministerial Guidelines.

3.7 Section 4.7 of the Apartment Guidelines 2018 states the following in relation to childcare facilities:

*“Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one childcare facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the **scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.**”* (Emphasis added)

3.8 Having regard to the provisions set out above, it is considered appropriate to discount the 20 no. studio and 25 no. one bed units from the childcare requirements of the proposed development.

3.9 As the no. of 2 and 3 beds is below the minimum threshold of 75 dwellings requiring 20 no. childcare spaces to be provided, the non-inclusion of a childcare facility is considered reasonable for this proposed development. It is also submitted that a childcare facility which provides less than 20 no. spaces would not be commercially viable. In considering this matter, the Board should also have regard to the fact that the 51 no. 2-bedroom units and 6 no. 3 bedroom units may not all be occupied by families with children and this would further reduce the likely childcare demands arising from the development.

Dun Laoghaire Rathdown County Development Plan 2016-2022

3.10 Policy SIC11 (Childcare Facilities of the Development Plan) states that *‘it is Council policy to encourage the provision of affordable and appropriate childcare facilities as an integral part of proposals for new residential developments and to improve/expand existing childcare facilities across the County. In general, at least one childcare facility should be provided for all new residential developments subject to demographic and geographics needs’.*

3.11 Section 8.2.12.1 of the Development Plan states that the Planning Authority must have regard to the presence of existing facilities in the area and must list and display locations of existing childcare facilities within the vicinity of the subject site. In this context, we note that the proposals for the Frascati Centre seek to provide a greater mix of uses within a recently rejuvenated shopping centre, and the challenge of also

providing a childcare facility on site would be significant commercially and operationally.

4.0 ASSESSMENT OF NEEDS

Proposed Population

- 4.1 The proposed development submitted to the Board comprises a Strategic Housing Development of 102 no. residential units (45 no. permitted, which are to be altered, and 57 no. new residential units). The proposed development provides for a mix of unit types and sizes, including 20 no. studios, 25 no. 1 beds, 51 no. 2 beds and 6 no. 3 beds.
- 4.2 It is estimated, as demonstrated below, that the maximum occupancy of the proposed development could be 444 no. people, which has been calculated as follows:
- Studio 20 X 1 person per studio = 20;
 - 1 bedroom apartment: 25 X 2 people per apartment = 50;
 - 2 bedroom apartment, 51 X 4 people per apartment = 204;
 - 3 bedroom apartment; 6 X 6 people per apartment = 36
 - Maximum Total – 310 no. bedspaces.
- 4.3 The maximum total amount of the 310 no. bedspaces which could be occupied by children is c. 126 based on excluding studio and 1 beds apartment unit and assuming that all apartment units are occupied by families and no second or third rooms of the 2 bed and 3 bed units are occupied by adults, with second rooms occupied exclusively by children ($102/2 + 36/3*2$). This figure represents a theoretical maximum and as a result it is likely that child occupation levels will be lower than this figure.
- 4.4 Due to the proportion of studio and one bedroom apartments within the proposed development, the city wide need for housing for single people and families without children and lack of such available housing within the mixed use development at Frascati in this particular area of Dun Laoghaire Rathdown, it is not considered reasonable to require the provision of a childcare facility to cater for needs arising from the 57 no. 2+ no. bed units proposed. It is expected that the development will have a much higher proportion of adults across all age ranges given the location of the site and the nature of the residential units offered.

Childcare Requirement

- 4.5 The Guidelines for Planning Authorities on Childcare Facilities (2001) recommend that new housing areas be provided with childcare facilities at a standard of one facility with 20 space for every 75 homes.
- 4.6 As outlined above, the proposed development of 102 no units would equate to a maximum requirement of 27 no. childcare spaces ($102 / 75 = 1.36 * 20$). It is noted that the review of the Childcare Guidelines, which is due soon, is predicated on the accepted view that the current guidelines are too onerous and lead to a level of childcare facilities that often exceeds market demand particularly in the long term.
- 4.7 Having regard to the Section 28 Apartment Guidelines 2018, it is considered appropriate to discount the 20 no. studio and 25 no. one bed units from the childcare requirements of the proposed development. Thus, as the remaining 51 no. 2 bed units and 6 no. 1 beds are below the minimum threshold, the non-inclusion of a childcare facility is considered reasonable for this proposed development. It is also submitted

that a childcare facility which provides less than 20 no. spaces would not be commercially viable. This is without taking into account that the remaining 2+bedroom units may not all be occupied by families with children.

- 4.8 A review of the existing childcare facilities in the area is outlined in Section 5 below to demonstrate that the provision of childcare facilities in the area can reasonably accommodate any future demand generated by the proposed development.

5.0 **EXISTING CHILDCARE FACILITIES**

- 5.1 Notwithstanding that the development falls below the threshold for childcare requirements, as set out in the Childcare Guidelines 2001 and the subsequent guidance provided in the Apartment Guidelines 2018, we carried out a review of the existing childcare facilities in the area in August 2020, the purpose of which is to demonstrate that the existing childcare facilities in the area can reasonably accommodate any future demand generated by the proposed development.
- 5.2 We have predominantly focused on the 1-1.5km boundary of the study area, however there are a number of facilities just outside the boundary that may still be considered either within walking distance, or easily accessible, hence they are considered to be relevant to the study.
- 5.3 It is clear that there is a significant provision of facilities in the area, therefore it is considered that there is adequate provision to cater for the limited childcare needs demand generated by the proposed development.

Table 1: Childcare facilities within c. 1km of the subject site.

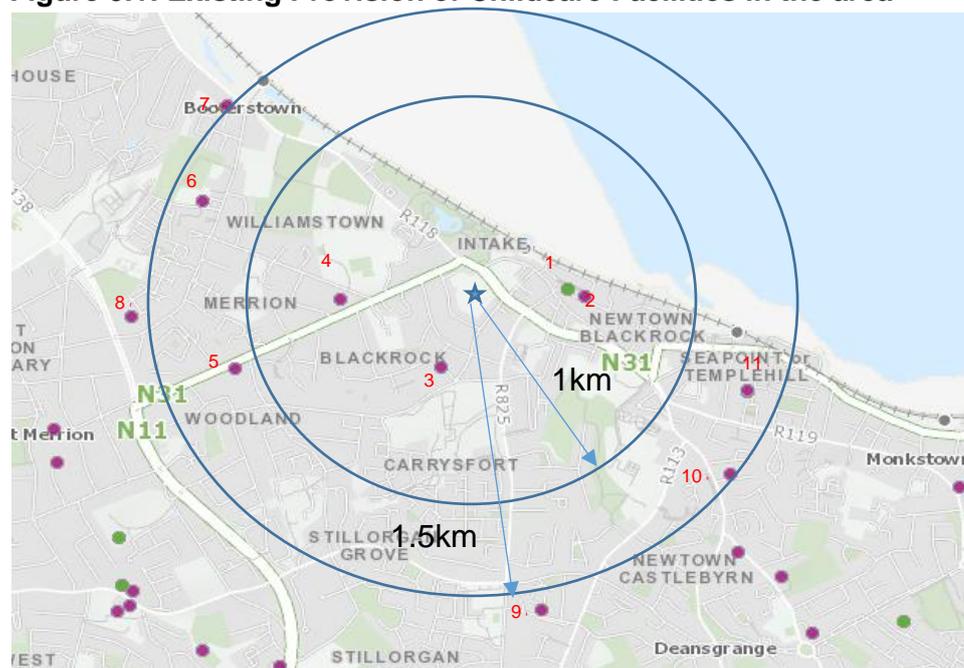
	Childcare Facility	Services	Provision	Current Availability
1	Simbas Childcare Limited	No response provided		
2	Little Apples Academy	Full day care, all year around.	45	No availability until September 2021
3	Cocos Creche & Montessori School Syndey Terrace	Full time	36	No availability until September 2021
4	Our World Montessori	No response provided		
5	Cocos Childcare mount Merrion	Full time	50	No availability until September 2021
6	The Children's House	No response provided		
7	Boosterstown Montessori Preschool	Part time	22	No availability until September 2021
8	Park Academy Childcare Boosterstown	Sessional, part time and after school	37 for sessional + 45 after school	5
9	Guardian Angels Montessori School	No response provided		
10	Simbas Childcare limited	No response provided		

11	Explorers After School Scoil Lorcaín	No response provided		
Total			149*	5*

*Excluding facilities where no response was provided

5.4 The facilities are plotted on the map below as per the numbers allocated in the table above.

Figure 5.1: Existing Provision of Childcare Facilities in the area



5.5 The results of the study found that there are a large number of childcare providers in close proximity to the application site (4 no. within 1km of the site and a further 7 no. facilities within 1.5km of the site). Based on the facilities who responded to the survey, there is a current maximum capacity to cater for 149 no. children and current availability for 5 no. childcare spaces. A number of facilities did not respond to the survey. Thus, it is considered that capacity exists within the surrounding area to cater for the limited childcare needs generated by the scheme.

5.6 In terms of the Childcare Guidelines, the requirement of 15 no. childcare spaces (57 / 75 * 20) represents c. 10% of the current capacity of childcare facilities in the area, however, the need for such facilities would not arise simultaneously from the development. There is also a current vacancy of 5 no. spaces, with more availability expected in 2021. We also note that there a number of other childcare facilities outside the 1-1.5 km catchment area which would have additional capacity to cater for the development.

5.7 It is respectfully submitted that there is sufficient provision at present in the area to cater for the childcare needs of the existing and proposed residential development and it would be unreasonable to require a childcare facility from a development that would generate a maximum childcare requirement of c. 15 no. spaces based on the criteria in the Guidelines.

6.0 CONCLUSION

- 6.1 The Childcare Facility Guidelines 2001 require new residential developments of 75+ units to provide 20 childcare spaces for every 75 units. However, this position is clarified in the 2018 Apartment Guidelines, which state that studios and 1 beds can be omitted from such calculations and in certain instances 2 bed units can be dismissed. The proposed scheme of 102 no. units, incorporates 51 no. 2 bed units and 6 no. 3 beds, and is therefore below the threshold of 75 no. units requiring 20 childcare spaces. Thus, in policy terms it is submitted that a good case exists for the non-inclusion of a childcare facility from this residential scheme, which is proposed above the recently rejuvenated Frascati Centre.
- 6.2 It is also submitted that a childcare facility which provides less than 20 no. spaces would not be commercially viable and would be challenging to operate from a mixed-use environment such as the Frascati Centre. In addition, based on an audit of the existing childcare facilities serving an area of approximately 1-1.5km from the subject site, it has been demonstrated that there are significant existing childcare facilities in the wider area. Given the limited need arising from this development it is reasonable to assume that the childcare needs of the proposed development could be catered for in these existing facilities.
- 6.3 Having regard to the above, it is respectfully submitted that this report has demonstrated that there is a good justification for the omission of a childcare facility from the proposed development in planning policy terms and also based on an assessment of existing provision in the wider area and the project demand arising from the proposed development.