

# SLA

Stephen Little  
& Associates

## Planning Application Report

Largescale Residential  
Development

Modifications  
(Revision 2) to  
development  
permitted under  
LRD6074/24-S3,  
LRD6042/23-S3A &  
SHD ABP-310567-21  
as amended by  
LRD6080/25-S3A

At No. 42A Parkgate  
Street, Dublin 8.

For Ruirside  
Developments Ltd

**MARCH 2026**

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## 1 INTRODUCTION

We, Stephen Little & Associates Chartered Town Planners and Development Consultants have been instructed by our client, Ruirside Developments Ltd (*“the LRD Applicant”*), Overend House, Dundrum Town Centre, Sandyford Road, Dundrum, D16 A4W6, to prepare this Planning Application Report and Statement of Consistency to accompany a planning application for Large-scale Residential Development (LRD).

The LRD Planning Application seeks permission for modifications to consented Large-scale Residential Development DCC Reg. Ref. LRD6074/24-S3, DCC Reg. Ref. LRD6042/23-S3A and SHD ABP-310567-21 as amended by DCC Reg. Ref. LRD6080/25-S3A, at No. 42A Parkgate Street, Dublin 8.

The proposed development broadly seeks modifications (Revision 2) to the residential unit mix and associated localised reconfiguration of the floor plan and elevation details. These modifications are entirely consistent with the relevant residential development standards of the Dublin City Development Plan 2022-2028 and the Apartment Guidelines 2025.

The proposed modifications to the scheme will result in an increased overall total of 569no. apartment units (i.e. an uplift of 7no. units). This has been achieved through internal reconfiguration of the permitted floor plans, and some associated adjustment of external elevations to match. Refer to the enclosed Architectural Design Statement, prepared by Reddy Architecture + Urbanism, which includes a permitted and proposed Housing Quality Assessment, for details.

This application is being made concurrent to a separate planning application (referred to as Revision 1). The modifications proposed under this application do not depend on the delivery of the modifications proposed under Revision 1. We refer the Planning Authority to the enclosed Architectural Design Statement, prepared by Reddy Architecture + Urbanism, which provides an overview of the combined changes proposed under both the Revision 1 and Revision 2 applications, for information purposes.

There is no proposed material change to the already permitted building height, massing, footprint or external appearance, or to the demolition, conservation or site works of the consented scheme, associated with the proposed modifications.

For a more comprehensive description of development please refer to Section 8 of this report, and to the plans and particulars that accompany this pre-planning submission.

This LRD application has been prepared on behalf of the Applicant by: -

- Stephen Little & Associates, Chartered Planners and Development Consultants.
- Reddy Architecture & Urbanism
- ARUP Group
- Mitchell + Associate Landscape Architects
- IN2 Engineering Design Partnership
- ModelWorks
- ARC Architectural Consultants
- AWN Consulting
- Altemar Ecological Consultants

In accordance with the statutory Regulations, we confirm that an electronic fund transfer (EFT) has been made to Dublin City Council as the appropriate fee in this instance (proof of payment enclosed). This covers the application fee for proposed new and modified residential units, modified non-residential floor space and the submission of a Natura Impact Statement (NIS) with the application.

The Supplementary Form 19 associated with this stage of the LRD Application Process has been completed and is also enclosed herewith. A complete list of enclosures with this application can be found at Section 15 of this Report.

The enclosed planning application drawings have been screened by this office for consistency with the requirements of the Planning & Development Regulations 2001, as amended.

This Planning Application Report and Statement of Consistency sets out how, in our opinion, the proposed development complies with the proper planning and development of this site in the context the relevant strategic and local planning policy, as expressed primarily in the Dublin City Council Development Plan 2022-2028.

This Report, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants, should be read in conjunction with the plans and particulars submitted with this application. A list of the various accompanying material is outlined in the enclosures list at the end of this Report.

## 2 THE APPLICANT

The Applicant in this case is Ruirside Developments Ltd, the required details of which are as follows:  
-

**Name:** Ruirside Developments Ltd

**Address:** Overend House, Dundrum Town Centre, Sandyford Road, Dundrum, D16 A4W6.

**Telephone:** 01 2164060

**Email:** [ewilcox@castlethorn.ie](mailto:ewilcox@castlethorn.ie)

Castlethorn Unlimited Company, of Overend House, Dundrum Town Centre, Sandyford Road, Dundrum, D16 A4W6, is acting for the Applicant, hence their email is being used.

## 3 LAND OWNERSHIP

The application site is owned by The Platform ICAV acting on behalf of the Phoenix sub-fund, 5<sup>th</sup> Floor, 76 Sir John Rogerson's Quay, Dublin Docklands, Dublin 2, who has issued a Letter of Consent, dated 05 March 2026, consenting to the Applicant to make a planning application in respect of this site. This letter is enclosed with this application.

We would highlight that the red line application site boundary, within which the proposed modifications are located, does not change from that of the consented scheme. As such a portion of the site is within the ownership/control of Dublin City Council, including a public footpath and open spaces located on the north and eastern site boundary. Notwithstanding that no change is proposed to the DCC land, letters of consent from Dublin City Council's Transportation and Parks Departments accompany the current LRD application.

## 4 COMPLIANCE WITH LRD PLANNING LEGISLATION

### 4.1 LRD DEFINITION

Permission is being sought for proposed modifications to a consented residentially-led mixed use development, at a site of approximately 0.82 hectares at No. 42A Parkgate Street, Dublin 8.

We consider the scheme as modified is Large Scale Residential Development (LRD) as defined by the Section 2 of the Planning & Development Act 2000 (as amended).

Section 2 of the Act confirms, *inter alia*, that: -

“LRD’ means large-scale residential development;

...

‘large-scale residential development’ means a development that includes -

(a) the development of 100 or more houses,

- (b) the development of student accommodation that includes 200 or more bed spaces,
- (c) both the development of 100 or more houses and of student accommodation, or
- (d) both the development of student accommodation that includes 200 or more bed spaces and of houses.

where the LRD floor space of -

- (i) in the case of paragraph (a), the buildings comprising the houses,
- (ii) in the case of paragraph (b), the student accommodation,
- (iii) in the case of paragraphs (c) and (d), the buildings comprising the houses and the student accommodation,

is not less than 70 per cent, or such other percentage as may be prescribed, of the LRD floor space of the buildings comprising the development;

'LRD floor space', in relation to a building or part of a building, means the area ascertained by the internal measurement of the floor space on each floor of a building or part of a building (including internal walls and partitions), disregarding any floor space provided for—

- (a) the parking of vehicles by persons –
  - i. occupying or using the building or the part of the building,
  - ii. for a purpose incidental to the primary purpose of the building or part of the building,

and
- (b) ancillary residential services, including gyms and child-care facilities;

The consented scheme as amended would continue to comprise more than 100 residential units, amounting to not less than 70% of the overall LRD floor space. We are of the professional opinion that the consented scheme with the proposed amendments would meet the statutory definition of Large-scale Residential Development.

As the proposed development consists of amendments to consented Large-scale Residential Development DCC Reg. Ref. LRD6074/24-S3, DCC Reg. Ref. LRD6042/23-S3A and SHD ABP-310567-21 as amended by DCC Reg. Ref. LRD6080/25-S3A, the Planning Authority will be **restricted to assessing only the proposed modifications** to the consented scheme, other than in respect of environmental effects, under Section 34(3C) of the Planning and Development Act 2000 (as amended), which states:

*"3C) In determining an application for permission that relates to a development in respect of a part of which **permission has previously been granted**—*

- (a) **under section 9 of the Planning and Development (Housing) and Residential Tenancies Act 2016, or**
- (b) **on foot of an application in accordance with section 32A, the planning authority concerned shall, notwithstanding section 34(2)(a), be restricted in its determination of the application, other than in respect of any assessment of the effects of the proposed development on the environment, to considering the modifications proposed by the applicant to the previously permitted development and for the purposes of determining such an application the reference in subsection ("") to "the development concerned" shall be read as a reference to "the modifications to the previously permitted development"**

## 4.2 LRD CONSULTATION

We can confirm that a Section 247 Pre-Planning Consultation meeting took place with the Planning Authority, on 21 January 2026. We refer the Planning Authority to Section 7 of this Report which provides further detail.

In a letter dated 26 March 2026, Dublin City Council states its determination, based on the plans and particulars received by it on 28 October 2025 and 01 March 2026, and having compared the proposed development to the previously permitted scheme at the same site, that:

- (a) *“The proposed development is substantially the same as the permitted development, and*  
 (b) *The nature, scale and effect of any alterations to the permitted development are not such that require the consultation process to be repeated.*

*The Planning Authority has determined that no further consultation is required under Section 247 in relation to the proposed development.”*

The Planning Authority’s determination notification, dated 26 March 2026, is enclosed with this planning application.

Consequently, and for avoidance of doubt, there is no Planning Authority LRD Opinion or corresponding ‘Applicant’s Response’ to such Opinion accompanying this LRD planning application.

### 4.3 STATUTORY NOTICE

In accordance with Article 18(1)(d)(iv) of the Regulations 2001 (as amended) the planning notice and newspaper notice includes confirmation that the planning application is LRD and includes a web address where the application can be viewed ([www.ParkgateStreetLRDRev2.com](http://www.ParkgateStreetLRDRev2.com))

## 5 LIFE OF PERMISSION SOUGHT

The applicant is seeking permission with a life of 8 years for the proposed modifications to the consented scheme.

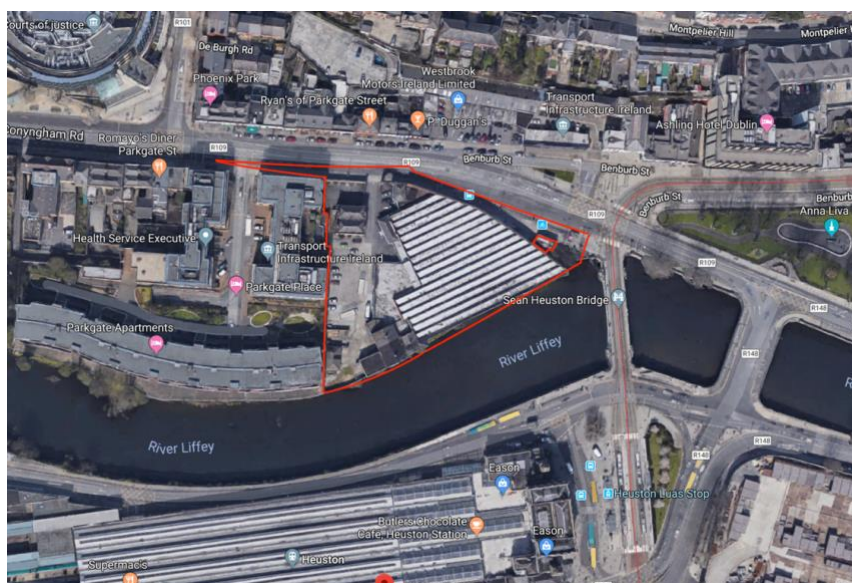
This would be commensurate with the life of permission granted for Block B1 and C (LRD6074/24-S3) Block B2 (LRD6042/23) and Block A (LRD6080/25-S3A) within the same shared planning unit.

## 6 SITE DESCRIPTION & CONTEXT

The application site is a brownfield site, last occupied by Hickey’s Fabrics warehouse and main office.

This triangular shaped site measures approximately 0.82 ha. It is bounded by Parkgate Street to the north, the River Liffey to the south, the junction of Sean Heuston Bridge and Parkgate Street and a small electricity substation to the east, and the Parkgate Place office and residential development to the west.

The application site forms the eastern section of a larger former industrial site sitting between Parkgate Street and the River Liffey. The former industrial site was divided some time prior to 1940, and the western section is now occupied by the Parkgate Place 4-5 storey office and residential development.



**Figure 1:** Application site outlined approximately in red (Source: Bing Maps, with overlays by SLA). Please refer to the enclosed Site Location Plan prepared by Reddy Architecture & Urbanism, for the definitive red line boundary of the subject site.

The application site is easily accessible on foot, being within walking distance of most of the key retail, employment and recreational amenities of the city centre. The site is close to various healthcare and third level education campuses, including St. Patricks University Hospital, St. James' Hospital and TU Grangegorman. The area is also well served by legal and administrative services, with the new Criminal Court, the Four Courts and Dublin City Council Civic Offices all a short distance away.

The site is proximate to cycle facilities along the quays and to a number of Dublin Bike Stations. The site is within walking distance of a number of significant public transportation services, including Heuston Station Intercity Railway Station, Heuston Red Line LUAS stop (linking to Connolly Station) and numerous Dublin bus services which operate on Parkgate Street and the City Quays (route no's 25, 25a, 25b, 26, 66, 66a, 66b, 66e, 67, 69 and 145).

The site also lies adjacent to an excellent range of cultural and recreational amenities, such as the expansive Phoenix Park and Dublin Zoo, the National Museum of Ireland at Collins Barracks, the Irish Museum of Modern Art at Kilmainham and the Guinness Storehouse to name a few.

## 6.1 EXISTING AND CONSENTED DEVELOPMENT

### 6.1.1 Former Use

The Phoenix Iron Works was founded in 1808. The application site occupies the eastern half of the former ironworks site. Most of the original ironworks buildings were demolished and replaced by other buildings and structures in the mid 1880's. The site has seen a number of changes of use over time: to a woollen mills (late 1800's); shell factory / government depot (early 1900's); printers (early-mid 1900's); bookbinders / publishers (mid-late 1900's), and a textile warehouse (1970's – '00's). The western half of the original industrial site has most recently been redeveloped as a mixed use office and residential scheme.

The application site was last occupied by Hickey's Wholesale Fabrics warehouse and head office, for over 40 years dating back to the 1970s. The existing buildings on site total c.4,500 sqm, including the large single-storey warehouse, ancillary stores and former house/office. These buildings have fallen into disrepair and dilapidation to various degrees.

We refer to the sections below for details of the consented scheme at this site.

### 6.1.2 Consented Scheme - Overall

The consented scheme is permitted under the following DCC planning references:

LRD6042/23-S3: Block B2 Residential [40no. apartments].

LRD6074/23-S3: Blocks B1 & C Residential [316no. apartments], Mixed Use and Site Works (including demolition, conservation and works at basement, undercroft, ground and roof level.

LRD6080/25-S3A: Block A & B2 Residential [198 + 8 = 206no. apartments], Mixed Use, amending underlying SHD consent ABP-310567-21. Includes BTR apartments.

#### LRD Revision 2 Proposed Modifications

This LRD Revision 2 proposes modifications to the consented apartment unit mix and internal floor plan layout across Blocks A, B1, B2 and C. These changes result in the modification of 53no. permitted apartment floor plans and a net increase of 7no. units, increasing the overall permitted total from 562no. units to 569no. units.

### 6.1.3 LRD6042/23 - Change of Use of Block B2 from Office to Residential and ancillary amenities

On 4 March 2024, DCC granted permission, with a **life of 8 years**, for development generally comprising a change of use of **Block B2** from office (c.4,113 sq m over 6 office floors) to **40no. residential apartments** over 8 residential floors (i.e. 1<sup>st</sup> to 8<sup>th</sup> floor levels), comprising:

- 30no. 2-bed/4 person
- 10no. 2-bed/3 person units,

Each of the proposed apartments has a private 'winter garden' and/or balcony on the south and/or north elevation.

The proposed residential units are served also by:

- Community/cultural space (c.52 sqm) at ground floor level of Block B1.
- Reconfiguration of ancillary internal residential communal amenity area at mezzanine level, to include residents' lobby, lounge and fitness area (c.256sqm), replacing the consented residential amenity co-working space (c.300 sqm) at Block B.
- 20no. additional visitor bicycle spaces and 2no. cargo bike spaces within the consented public realm at surface level
- And all ancillary and associated site, structural, facade and landscape works proposed to facilitate the residential use and to tie amended Block B2 in with the wider consented scheme.

Tied to life of parent permission, which ultimately is **LRD6074/24-S3**. Life of that permission withers **20 June 2033**.

### 6.1.4 DCC LRD6074/24-S3 - Blocks B1 & C & Site Works

On 10 December 2024, an LRD application (LRD6074/24-S3) sought an 8 year permission for mixed use residential, community and commercial redevelopment (c. 26,027 sq m gross floor area), accommodated in 2no. blocks (**Block B1 and Block C**) ranging in height from 8 to 13 storeys with basement and undercroft, and including:

- **316no. apartments** (178no. 1-bed units and 138no. 2-bed units), with associated private balconies on north, south, east and west building elevations and communal roof terraces at Levels 07, 08, 09 and 12;
- ancillary internal residents' amenity facilities (c.226 sq m);
- co-working/community/cultural space available for public hire (c.496 sq. m);
- ground level retail (c.147 sq. m).
- And all associated and ancillary demolition, conservation, landscaping and site development and roof plant works.

This replaces **ABP-306569-20** parent permission for Blocks B, C and Site Works, which withered in July 2025.

Final permission, with a **life of 8 years**, was issued by Dublin City Council on 10 April 2025. Permission withers **20 June 2033**.

### 6.1.5 DCC LRD6080/25-S3A - Blocks A & B2 (amendments to SHD ABP-310567-21)

On 10 April 2025, an LRD application (LRD6080/25-S3) sought permission for reconfiguration of **Block A and Block B2**), including:

- Increase in the footprint (from 479sqm to 569sqm) and gross floor area of Block A (from 14,364sqm to 16,693sqm), to accommodate a second internal fire core extending from ground level to Level 27 inclusive.

- Minor internal layout reconfiguration at ground and mezzanine levels, to accommodate the new fire core, also resulting in: -
- An increase in floor area of permitted café/restaurant unit at ground floor of Block A from c. 223sqm to c.282sqm
- A decrease in floor area of permitted community facility at ground floor of Block B2 from c. 52sqm to c. c.49sqm
- An increase in floor area of permitted café/restaurant unit at ground floor of Block B2 from c. 229sqm to c.295sqm.
- Consequent **reconfiguration of 198no. permitted 'Build-to-Rent' apartments** (73no. studios, 97no. 1-bed, 27no. 2-bed and 1no. 3-bed) located at **Block A Levels 01 to 27 inclusive, resulting in an altered mix to 26no. studio, 118no. 1-bed, 53no. 2-bed and 1no. 3-bed apartments, with no change to the total number (i.e. 198no.)** within Block A.
- Insertion of 8no. new 2-bed apartments (1no. in each of Levels 01 to 08 inclusive) and 1no. studio apartment and 1no. 1-bedroom apartment in lieu of 2no. 2-bed apartments at level 09 in Block B2. This results in total **48no. permitted and proposed apartments in Block B2** (1no. studio, 1no. 1-bed and 46no. 2-bed).
- Associated adjustments to facade treatments at the north and south elevations of Block B2, including altered or additional private balconies.
- Ancillary provision of 42no. additional bicycle parking spaces.
- Localised adjustments to permitted ancillary site and landscape works, including to public plaza area (minor reduction from 1,430 sq m to 1,148sq m)

Beyond localised adjustments, no other changes were proposed to the associated and ancillary demolition, conservation, landscaping and site development works, including works to the river wall. These are covered by separate planning permission LRD6074/24-S3.

**LRD 6080/25-S3A** amends extant planning consents **ABP-310567-21** for Block A and **LRD6042/23-S3** for Block B2.

A final grant of permission, with a **life of 8 years (commensurate with the life of LRD6074/24-S3)**, is dated 9 July 2025. Condition 4(b) ties this with the life of permission LRD6074/24-S3, and thus permission withers **20 June 2033**.

## 7 LRD CONSULTATION WITH PLANNING AUTHORITY

### 7.1 SECTION 247 CONSULTATION

A section 247 consultation was held on 21 January 2026 and was attended by the following Planning Authority officers:

- Nicola Conlon, Senior Planner
- Rebecca Greene, Planner

The Planning Authority were broadly satisfied with the proposed development and welcomed the change of apartment unit mix and design, which meet the standards of Dublin City Development Plan 2022-2028 and the relevant Apartment Guidelines.

The applicant was advised to submit a request in writing for the Planning Authority to confirm its formal determination as to whether LRD Stage 2 consultation would be required in this case. See Section 7.1 above – the Planning Authority has determined that further consultation is not required in this case.

## 8 PARTICULARS OF THE PROPOSED DEVELOPMENT

### 8.1 DESCRIPTION OF DEVELOPMENT

Permission with a life of 8 years for Large-Scale Residential Development is south at a site (c. 0.82 ha), at No. 42A Parkgate Street, Dublin 8.

This is a brownfield site of former Parkgate Printing Works, now known as Parkgate House. There are Protected Structures on site, including (a) riverside stone wall; (b) turret; (c) square tower; and (d) stone arch.

The proposed development comprises modifications to a large-scale residential development permitted under LRD6074/24-S3, LRD6042/23-S3A & SHD ABP-310567-21 as amended by LRD6080/25-S3A at No. 42A Parkgate Street, Dublin 8. The proposed modifications to the scheme, on their own, will result in an increased overall total of 569no. apartment units (**an uplift of 7no. units**). This will be achieved by the following proposals:

- Permitted 2no. 2-beds (total 6no.) to proposed **4no. studios (total 12no.)**, repeated across L07 – L09 (**3 levels**) in Blocks B1 & C.
- Permitted mezzanine residential amenity (151sqm) to proposed **residential amenity (44sqm)** and **1no. 3-bed (4-person)** in Block B1.
- Alterations to elevation **fenestration** and internal **floor plan reconfiguration** of 2-bed (4-person) unit, to create **3-bed (4-person) unit**, repeated across L00-L08 (9 levels) in Block C (**total 9no.**).
- Alterations to elevation **fenestration** and internal **floor plan reconfiguration** of 2-bed (4-person) unit, to create **3-bed (4-person) unit**, repeated across L01-L11 (11 levels) in Block B1 (**total 11no.**).
- Internal **floor plan reconfiguration** of 2-bed (4-person) unit, to create **3-bed (4-person) unit**, repeated across L01-L27 (27 levels) in Block A (**total 27no.**).

As noted above, this application is being made concurrent to a separate planning application (referred to as Revision 1). The modifications proposed under this application do not depend on the delivery of the modifications proposed under Revision 1. We refer the Planning Authority to the enclosed Architectural Design Statement, prepared by Reddy Architecture + Urbanism, which provides an overview of the combined changes proposed under both the Revision 1 and Revision 2 applications, for information purposes.

This application for a **Large-Scale Residential Development** as defined under Section 2 of the Planning & Development Act 2000, as amended.

A **Natura Impact Statement** has been prepared in respect of the proposed development and accompanies this application.

### 8.2 UNIT MIX

A breakdown of the permitted unit mix is provided below: -

Block	1-Bed Studio	1-Bed	2-Bed (3Pers)	2-Bed (4-Pers)	3-Bed	Total
Block A	26no.	118no.	26no.	27no.	1no.	198no.
Block B2	1no.	1no.	8no.	38no.	-	48no.
Block B1 & C	-	178no.	24no.	114no.	-	316no.
<b>Total</b>	<b>27no.</b>	<b>297no.</b>	<b>58no.</b>	<b>179no.</b>	<b>1no.</b>	<b>562no.</b>

**Table 1:** Residential Unit Mix Overall Scheme – Permitted (all units).

Proposed modifications (Revision 2) to the residential unit mix now comprise: -

- Permitted 2no. 2-beds (total 6no.) to proposed **4no. studios (total 12no.)**, repeated across L07 – L09 (**3 levels**) in Blocks B1 & C.

- Permitted mezzanine residential amenity (151sqm) to proposed **residential amenity (44sqm)** and **1no. 3-bed (4-person)** in Block B1.
- Alterations to elevation **fenestration** and internal **floor plan reconfiguration** of 2-bed (4-person) unit, to create 3-bed (4-person) unit, repeated across L00-L08 (9 levels) in Block C (**total 9no.**).
- Alterations to elevation **fenestration** and internal **floor plan reconfiguration** of 2-bed (4-person) unit, to create **3-bed (4-person) unit**, repeated across L01-L11 (11 levels) in Block B1 (**total 11no.**).
- Internal **floor plan reconfiguration** of 2-bed (4-person) unit, to create **3-bed (4-person) unit**, repeated across L01-L27 (27 levels) in Block A (**total 27no.**).

The table below summarises the proposed unit mix in combination with the permitted scheme: -

Block	1-Bed Studio	1-Bed	2-Bed (3Pers)	2-Bed (4-Pers)	3-Bed (4-Pers)	3-Bed (5 Pers)	Total
Block A	26no.	118no.	26no.	-	27no.	1no.	198no.
Block B2	1no.	1no.	8no.	38no.	-	-	48no.
Block B1 & C	12no.	178no.	24no.	88no.	21no.	-	323no.
<b>Total</b>	<b>39no.</b>	<b>297no.</b>	<b>58no.</b>	<b>126no.</b>	<b>48no.</b>	<b>1no.</b>	<b>569no.</b>

**Table 2:** Residential Unit Mix Overall Scheme – Permitted and Proposed Dwelling Mix (all units).

The proposed reconfiguration of a 2-bed (4-person) unit to a 3-bed (4 person) apartment type is provided for by the Apartment Guidelines 2025.

We refer the Planning Authority to the **Architectural Design Statement** prepared by Reddy Architecture and Urbanism for further schedule of accommodation details.

### 8.3 UNIT SIZE

The proposed modified units (all 'build to sell') meet the floor area and storage area requirements of Appendix 1 of the Apartment Design Guidelines 2025. Refer to enclosed Housing Quality Assessment, contained in the **Architectural Design Statement** prepared by Reddy Architecture and Urbanism for details.

### 8.4 AMENITY SPACE AND LANDSCAPING

#### 8.4.1 Landscaping

No modifications are proposed to the landscaping permitted under DCC Reg. Ref. LRD6074/24-S3, LRD6042/23-S3A & SHD ABP-310567-21 as amended by LRD6080/25-S3A.

#### 8.4.2 Public Open Space

Section 15.8.6 of the City Plan requires that all residential development is required to provide for public open space. The minimum quantum for Z5 zoned lands is 10% of the site area. It should complement the site layout and surrounding environment, and where possible be contiguous to existing open space or natural features in the vicinity. It should benefit from passive surveillance, adequate daylight and sunlight penetration, and be publicly accessible for all users for the purpose of active and passive recreation.

There are no changes proposed to the public open space permitted under LRD6074/24-S3.

The most significant features of the permitted public amenity open space include the 'river walk' and public plaza, connecting to Parkgate Street and the River Liffey.

Publicly accessible open space and amenities will be open during normal public park opening hours only and otherwise access controlled by the management company.

### 8.4.3 Private Open Space

Private amenity space has been provided for all units in Block B1, B2 & C, with the exception of the 6no. additional units at levels 07-09 proposed as part of this application.

The 21 no. 3 bed 4 person apartments in Blocks B and C have been provided with 7sqm private balconies, and an additional allowance of 2 sqm per unit has been allowed for in the communal open space calculations.

The 27 no. 3 bed 4 person apartments in Block A have not been provided with private balconies, an additional 18 sqm per unit has been allowed for in the communal open space calculations.

This is in accordance with Section 3.8 of the Apartment Guidelines 2025

We refer to the enclosed **Housing Quality Assessment**, prepared by Reddy Architecture + Urbanism for details regarding the quantum provided.

We refer the Planning Authority to the enclosed **Sunlight & Daylight Assessment Report**, prepared by IN2 Consulting which demonstrates that units perform well in terms of sunlight and daylight accessibility.

### 8.4.4 Community Amenity Space

The consented development combined with the proposed modifications (resulting in 569no. apartments total, of which 145no. remain 'BTR') requires a total of c. 2,942sqm of communal open space to meet relevant requirements of the Apartment Guidelines 2025: -

Unit Type	Studio*	1-bed	2-bed (3-Pers)	2-bed (4-Pers)	3-bed (4-Pers)**	Build to sell units (Block A)***	Build-to-Rent units (Block A)****
No. Units	13no.	179no.	32no.	126no.	21no.	53no.	145no.
Required Communal Open Space	100sqm	895sqm	192sqm	882sqm	231sqm	642sqm	N/A
<b>Total</b>							<b>2,942sqm</b>

\* 6no. studios have no private amenity, 8sqm of external communal space is allocated to these units

\*\* An allowance of an additional 2sqm per unit is allocated to 3-bed apartments with 7sqm of private open space

\*\*\* Proposed Build to Sell units in Block A provided additional communal open space where private open space is not provided.

\*\*\*\* Build to Rent apartments, permitted under 2020 Apartment Guidelines, have access to c. 827sqm of external and internal amenity

**Table 3:** Permitted and Proposed Communal Open Space Requirement (all units). Flexibility allowed for unchanged Block A 'BTR' unit types permitted under the Apartment Guidelines 2020 in force at the time.

The consented development, as modified, delivers c. **3,204sqm of external communal amenity space** and c. 565sqm of internal communal amenity space. Breakdown provided below.

Provided	Block A	Block B1	Block B2	Block C	Total
External	343sqm	1,725sqm	371sqm	764sqm	3,204sqm
Internal	398qm	115sqm	52sqm	-	565sqm
<b>Total</b>					<b>3,769sqm</b>

**Table 4:** Permitted and Proposed Communal Open Space Provision

2,942sqm of external communal amenity space is provided for the 424no. build to sell apartments. The 145no. build to rent apartments benefit from 262sqm of external communal amenity space and 565sqm of internal amenity.

We refer the Planning Authority to Section 5.8 of the **Architectural Design Statement**, prepared by Reddy Architecture and Urbanism, for further details. This also confirms that the consented scheme, in combination with the modifications proposed under this application and concurrent application (Rev 2) provides sufficient external amenity space in accordance with the Apartment Guidelines 2025.

#### 8.4.5 Children's Play

It may be noted that there are no changes proposed, nor are any required, to the ground level communal courtyard located between Blocks B and C, which includes a Children's Play Space of 85sqm permitted under DCC Reg. Ref. LRD6074/24-S3.

#### 8.5 SITE ACCESS

There are no changes proposed to the site access as permitted.

#### 8.6 BICYCLE PARKING

Bicycle parking for the modified unit mix and additional apartments (Rev 1 & Rev 1 combined) are proposed under the concurrent application for Revision 1. A breakdown of the additional parking is provided below: -

Type	*Permitted No. of Spaces	Combined Permitted + Proposed
Long-term	660	717
Short-term	72	83
Sheffield stands	8	10

\*As required under Condition 7 (b) of DCC Reg. Ref. 6074/24-S3 and 5 (b) of DCC Reg. Ref. LRD6080/25-S3A

**Table 5:** Permitted and Proposed Bicycle Parking Provision

We refer the Planning Authority to the enclosed **Letter**, prepared by ARUP Group which confirms that the proposed amendments do not constitute material change or modifications to the technical information provided for the scheme permitted under DCC Reg. Ref. LRD6074/24-S3, including the Transportation Statement submitted.

Furthermore, we refer the Planning Authority to the enclosed **Schedule of Accommodation**, prepared by Reddy Architecture + Urbanism which confirms the number of bicycle parking spaces provided.

#### 8.7 CAR PARKING

No additional car parking spaces are proposed. It is noted that the Dublin City Development Plan imposes maximum car parking standards for residential use, and that car parking may not be required at all where the site is immediately accessible to high capacity, high frequency public transport. Heuston Luas station is within 500m of this city centre site.

We refer the Planning Authority to the enclosed **Letter**, prepared by ARUP Group which confirms that the proposed amendments do not constitute material change or modifications to the technical

information provided for the scheme permitted under DCC Reg. Ref. LRD6074/24-S3, including the Transportation Statement submitted.

## 8.8 WATER & DRAINAGE SERVICES

We refer the Planning Authority to the enclosed **Letter**, prepared by ARUP Group which confirms that the proposed amendments do not constitute material change or modifications to the technical information provided for the scheme permitted under DCC Reg. Ref. LRD6074/24-S3, including the Drainage and Watermains Report. The associated appendices include a Confirmation of Feasibility and Statement of Design Acceptance from Uisce Eireann. Enclosed email correspondence from Uisce Eireann confirms that the Uisce Eireann Connection Agreement has been posted to ARUP (on behalf of the applicant) and should arrive shortly.

## 8.9 FLOOD RISK

We refer the Planning Authority to the enclosed **Letter**, prepared by ARUP Group which confirms that the proposed amendments do not constitute material change or modifications to the technical information provided for the scheme permitted under DCC Reg. Ref. LRD6074/24-S3, including the Flood Risk Assessment which concluded that: -

*There is no record historical flooding at the site.*

*While the site borders the River Liffey, flood risk to the site is low and existing ground levels are above the maximum 1% AEP fluvial water level and the 0.5% AEP tidal level. The risk of groundwater flooding is also low.*

*There is a risk of pluvial flooding at the site. This risk will be managed through grading of paved surfaces to direct surface water to the drainage system, and provision of drainage channels across entrance points to collect surface water. Further mitigation actions will be taken to remove part of the surface runoff from the combined sewer on Parkgate Street and relieve the drainage system in the area, reducing the risk of pluvial flooding in the vicinity of the site.*

*The minimum site flood defence level of the proposed development including an allowance for climate change and freeboard is 4.07mOD.*

*Flood risk to the buildings on site will be managed by setting minimum FFLs to 5.20mOD.*

*Access and egress routes will not be compromised during a flood event with the exception of the route to the internal river walk next to the River Liffey. This is not a primary access and egress route for the proposed development and the entrance/exit point to the building itself will be above the minimum site flood defence level.*

*The proposed development will also not impact on floodplain storage or conveyance.*

*As a small area of the existing site is within the 0.1% AEP tidal flood extent. The site is therefore classified as Flood Zone B and a Justification Test is required. Both the Plan Making and Development Management Justification elements of the Justification test have been assessed and both are deemed to be passed as part of this FRA.*

## 8.10 BASEMENT IMPACT

We refer the Planning Authority to the enclosed **Letter**, prepared by ARUP Group which confirms that the proposed amendments do not constitute material change or modifications to the technical information provided for the scheme permitted under DCC Reg. Ref. LRD6074/24-S3, including the Basement Impact Assessment.

### 8.11 CONSTRUCTION MANAGEMENT

We refer the Planning Authority to the enclosed **Letter**, prepared by ARUP Group which confirms that the proposed amendments do not constitute material change or modifications to the technical information provided for the scheme permitted under DCC Reg. Ref. LRD6074/24-S3, including the Construction and Environmental Management Plan.

### 8.12 WASTE MANAGEMENT

We refer the Planning Authority to the enclosed **Operational Waste Management Plan**, prepared by AWN Consulting.

### 8.13 CLIMATE & SUSTAINABILITY

We refer the Planning Authority to the enclosed **Climate Action Report**, prepared by IN2 Engineering Design Partnership which confirms that: -

*The proposed development has been designed to be resilient to climate change.*

### 8.14 DAYLIGHT & SUNLIGHT

We refer the Planning Authority to the accompanying **Daylight & Sunlight Analysis**, prepared by IN2 Engineering Design Partnership which confirms that the amended and additional apartments subject of this application meet the relevant standards.

The Report finds: -

#### **Impact on Neighbouring Buildings**

*The proposed amendments are internal to the granted buildings and therefore will not have any further impact on the existing neighbouring buildings.*

#### **Internal Daylight Analysis**

*For the granted permission, and subsequent amendments, all units were assessed for the Spatial Daylight Autonomy (SDA) methodology as detailed in the BRE Guide. A high compliance rate of 88% was achieved for all the rooms across the scheme. As a result, of the proposed amendment's the compliance rate across the scheme remains at 88%.*

#### **Compensatory Measures**

*For any rooms not achieving minimum compliance for SDA, these have been identified, and compensatory measures have been provided in Section 5.3 (of the enclosed **Daylight & Sunlight Analysis**, prepared by IN2 Engineering Design Partnership).*

### 8.15 CONSERVATION

We refer the Planning Authority to the enclosed **Addendum Architectural Heritage Impact Assessment**, prepared by ARC Heritage Consultants which finds: -

*The proposed modifications to the permitted development do not involve any works to structures of architectural heritage value, whether they are protected structures or not. Nor are the proposed modifications to the development likely to result in any material or perceived effects on the setting of structures of architectural heritage value over and above effects occasioned by the permitted development. Therefore, the proposed modifications will not give rise to any direct impact on the architectural heritage of any structures on the subject site or on their setting.*

## 8.16 VISUAL IMPACT

We refer the Planning Authority to the enclosed **Addendum Landscape & Visual Impact Assessment**, prepared by ARC Heritage Consultants which finds: -

*The permitted development will remain relatively unchanged facing the street and amendments to the approved are mostly confined parts of the buildings facing away from the street. It is unlikely the observers in the public realm will notice change resulting from the modifications proposed as part of the subject application. This particularly so since the buildings have not yet been constructed and the public will have no opportunity to compare the physical existence and character of the permitted development with how the development will appear following the amendments now sought. In terms of the scale, mass and bulk of the development, and its potential to give rise to visual effects on the surroundings, there is unlikely to be any material change perceived by observers.*

## 8.17 APPROPRIATE ASSESSMENT

We refer the Planning Authority to the enclosed **Natura Impact Statement**, prepared by Altemar which concludes that: -

*No significant effects are likely on Natura 2000 sites, their features of interest or conservation objectives. The proposed project will not adversely affect the integrity of European sites.*

## 9 STRATEGIC PLANNING CONTEXT – STATEMENT OF CONSISTENCY

### 9.1 NATIONAL PLANNING FRAMEWORK –FIRST REVISION 2025

The National Planning Framework (NPF) seeks to achieve the consolidation of Dublin City's development and growth within the M50 and canals to create more compact urban form. The NPF seeks 40% of all new homes to be located within the existing footprints of our urban settlements. In Dublin, development should be focused within the M50 and canal rings in order to consolidate the urban area. Development on infill and brownfield sites is seen as a key way to deliver this vision, particularly where such sites are served by high capacity public transport.

The subject site is exceptionally well placed to achieve this NPF vision. It delivers a high quality, mixed use regeneration development on a brownfield site at one of the city's key public transportation hubs.

This policy direction means encouraging more people, jobs and activity generally within our existing urban areas. It requires a change in previous development patterns which have predominately focused on 'greenfield' sites. In particular, it requires well-designed, high-quality development that can encourage more people, and generate more jobs and activity within existing cities, towns and villages.

Development must therefore meet appropriate design standards to achieve targeted levels of growth. It also requires active management of land and sites in urban areas.

The following are the key NPF Policy Objectives which support the principle of this development:

**National Policy Objective 4** notes a target of half (50%) of future population and employment growth will be focussed in the existing five cities and their suburbs.

**National Policy Objective 8** seeks to deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.

**National Policy Objective 12** promotes the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

**National Policy Objective 15** applies a tailored approach to urban development that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on: Dublin;... Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth; In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.

**National Policy Objective 20** states a presumption in favour of development that encourages more people and generates more jobs and activity within existing cities, towns and villages, subject to appropriate planning standards being met and targeted growth achieved.

In NPF Chapter 4 'Making Stronger Urban Places', the following Key Objective is relevant:

**National Policy Objective 22** requires that *"in urban areas, planning and related standards, including in particular height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth"*, subject to a range of environmental and residential amenity tolerances.

In NPF Chapter 6 'People Homes and Communities', the following Key Objectives are relevant:

**National Policy Objective 37**, that seeks to *"ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritizing walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages."*

**National Policy Objective 43**, that seeks to *"prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location."*

**National Policy Objective 45**, that seeks to *"increase residential density in settlements, through a range of measures including restrictions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights."*

**National Policy Objective 46**, that seeks to put in place Section 28 Ministerial Guidelines to improve the evidence base, effectiveness and consistency of the planning process for housing provision to meet varying housing needs at regional, metropolitan and local authority levels. For example, in reconciling future housing requirements effectively it is identified that in Dublin city, while one, two and three person households comprise 80% of all households, the housing stock is largely comprised of 3 and 4-bedroom houses.

### 9.1.1 Delivering Homes, Building Communities 2025-2030

Delivering Homes, Building Communities which replaced Housing for All, was published in 2025. It represents Government commitment to speed up the delivery of new homes and tackle homelessness and the acknowledged housing crisis. The plan targets the construction of 300,000 homes, including 72,000 social homes and 90,000 affordable housing supports by 2030.

The Government has put in place a myriad of actions specifically targeted at facilitating that increase in housing supply and these continue to be rolled out by Government in recognition of the real concern surrounding the shortfall in the supply of housing and the viability gap in delivering private new homes, particularly apartments.

Delivering Homes, Building Communities states that:-

*“Government is focused on making sure that everyone has access to good quality, affordable and secure homes that suit their needs. Having a place to call home provides stability, dignity, as well as supporting better health, educational and work outcomes.”*

To achieve this, Delivering Homes, Building Communities provides two pillars (Activating Supply and Supporting People) to achieving eight key priorities, being:-

- *Ensure a strong pipeline of zoned and serviced land is available;*
- *Create the conditions to attract the required investment;*
- *Increase skills and support the adoption of Modern Methods of Construction in the residential construction sector;*
- *Work toward ending dereliction and vacancy;*
- *Focus on ending homelessness, deliver homes for older people and support social inclusion;*
- *Deliver an average of 12,000 new social homes every year over the lifetime of the Plan;*
- *Promote affordable homeownership, protect renters and make buying and renting homes more affordable;*
- *Invest in the built environment of towns, villages and cities across the country to enhance community well-being.*

The latest housing targets agreed by Government in November 2024, and reflected in the publication of the approved NPF First Revisions (2025) and associated implementation guidelines, project the need for 55,500 dwellings per annum to 2030 nationwide. Dublin City, along with the 4 other Cities, is to receive 50% of this projected growth. Of that 40% is to be directed to brownfield and infill sites in the built up urban areas.

While it is acknowledged that the Government is taking steps to enhance the delivery of new dwellings, this will take some time to be realised. The proposed development, including the modification of unit types and an uplift of 16no. additional dwellings that address the current housing rental market, is ideally situated within the City Centre, will assist Government in bridging the gap between the target set and the shortfall which is currently happening on the ground.

The proposed development positively responds to each of the key eight priorities of Delivering Homes, Building Communities and should be supported in principle.

## 9.2 CLIMATE ACTION PLAN 2025

The Climate Action Plan 2026, initially due to be published by Government in December 2025, is likely to be further delayed until the end of 2026.

CAP25 remains relevant in the interim. It identifies that the dispersal of residential settlements, commercial zones and workplaces to peripheral areas instead of focusing on central areas and locations served by public transport, has led to an over-reliance on the private car. The Annex of Actions to 2025 includes an action to prepare sustainable settlement guidelines and to review planning guidelines to ensure a graduated approach in relation to the provision of car parking.

The proposed development is fully aligned to the Annex of Actions to 2025, in proposing additional new residential units within the western edge of Dublin City Centre, where the 15-minute neighbourhood can be a reality.

Refer also to Section 10 of this report for discussion regarding compliance with Dublin City Development Plan climate action policies and objectives.

## 9.3 SUSTAINABLE MOBILITY POLICY ACTION PLAN 2026-2030

### 9.3.1 High-Level Goals

These policy documents aim to support more sustainable modal shift between now and 2030, through infrastructure and service improvements, as well as demand management and behavioural change measures. This is with a view to encouraging healthier mobility choices, relieving traffic congestion, improving urban environments and helping to tackle the climate crisis.

The Policy is underpinned by 10 high-level goals: -

1. Improve mobility safety.
2. Decarbonise public transport.
3. Expand availability of sustainable mobility in metropolitan areas.
4. Expand availability of sustainable mobility in regional and rural areas.
5. Encourage people to choose sustainable mobility over the private car.
6. Take a whole of journey approach to mobility, promoting inclusive access for all.
7. Design infrastructure according to Universal Design Principles and the Hierarchy of Road Users model.
8. Promote sustainable mobility through research and citizen engagement.
9. Better integrate land use and transport planning at all levels.
10. Promote smart and integrated mobility through innovative technologies and development of appropriate regulation.

### 9.3.2 Consistency of Proposed Development with National Sustainable Mobility Policy Action Plan

The proposed development in combination with the balance of the consented scheme at this site is consistent with the key principles of encouraging use of more sustainable public transport, cycling and walking, given the highly accessible site location.

It meets a number of the relevant high level goals. It is consistent with the promotion of better integrated mobility, with respect to implementing land use and transportation (9), where the proposed residential use is set within a mixed use context and easily accessible by rail, bus, cycling and walking. The site is also immediately accessible to a major public transport interchange (train, light rail, bus) at Heuston Station.

It is consistent with the promotion of safe and green mobility, being part of a pedestrian priority development, connected with local services and employment opportunities within easy walking and

cycling distance and adjacent to a strategic public transport hub. The consented scheme with the proposed amendment will thus present choice of alternative, sustainable transport modes over the private car (5). High density, people focussed development in turn also supports investment in sustainable mobility infrastructure (3).

It is consistent with the promotion of people focussed mobility, where access for all and universal design principles are factored into the design of the proposed development (6 & 7).

**9.4 SECTION 28 MINISTERIAL GUIDELINES**

The following Statements of Consistency sets out how the proposed development is consistent with the Section 28 Ministerial Guidelines.

**9.4.1 Compact Settlement Guidelines 2024**

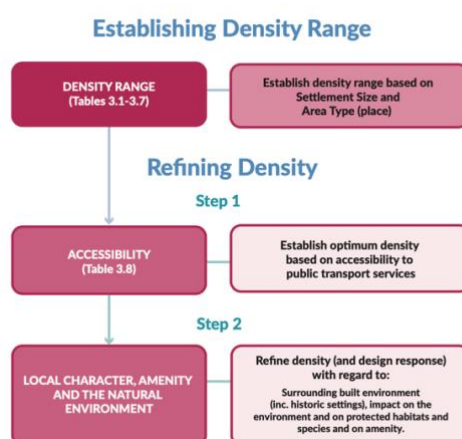
The Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities set national planning policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements.

The Guidelines replace the [Sustainable Residential Developments in Urban Areas-Guidelines for Planning Authorities](#) 2009 (now revoked). They build on and update previous guidance to take account of current Government policy and economic, social and environmental considerations. The Guidelines expand on higher-level policies of the National Planning Framework, setting policy and guidance in relation to the growth priorities for settlements, residential density, urban design and placemaking and introduce development standards for housing.

**9.4.1.1 Policy and Objective 3.1 – Density Ranges**

It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate.

Figure 3.3: Illustration of the process for establishing, optimising and refining appropriate density for a plan or development.



The proposed development seeks to provide an additional 16no. units within Blocks A, B1, B2 and C resulting in a marginally increased total of 569no. units on a net site area of c. 0.82ha. The resultant density in this instance is c. **694 dw/ha**.

This represents a minor overall uplift from previously permitted 685 dw/ha at this site, within a designated Strategic Development and Regeneration Area (SDRA7) where potential for high density mid-rise and landmark buildings has been identified in the Development Plan.

The Sustainable and Compact Settlements Guidelines for Planning Authorities (2024) (“the Compact Settlement Guidelines”) sets out the methodology for the determination of appropriate densities having regard for settlement hierarchies.

Table 3.1 of the Compact Settlements Guidelines set out the density ranges for Dublin. Give the location of the application site, it can be considered a ‘City- Centre’, the defining of which is: -

*“The city centres of Dublin and Cork, comprising the city core and immediately surrounding neighbourhoods, are the most central and accessible urban locations nationally with the greatest intensity of land uses, including higher order employment, recreation, cultural, education, commercial and retail uses. It is a policy and objective of these Guidelines that residential densities in the range 100 dph to 300 dph (net) shall **generally** be applied in the centres of Dublin and Cork”.*

In terms of accessibility, the application site can be considered ‘High Capacity Public Transport Node or Interchange’ as defined in Table 3.8 of the Compact Settlements Guidelines: -

*“Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects ‘Core Bus Corridor’ stop.  
Highest densities should be applied at the node or interchange and decrease with distance.”*

The proposed development is highly accessible with a number of high-frequency public transport routes in its vicinity including DART, Train, Luas, Dublin Bus and BusConnects routes.

The wording, referring to the general application of this density range, allows for some flexibility at sites suitable for higher density, with highest densities applied at significant public transport interchanges. The site is within 500m of Heuston Station and served by Luas, Dublin Bus and within easy walking and cycling distance of Dublin City Centre amenities and services.

Section 3.3.6 (a) of the Compact Settlement Guidelines states: -

*There is a presumption in these Guidelines against very high densities that exceed 300 dph (net) on a piecemeal basis. Densities that exceed 300 dph (net) are **open for consideration** on a **plan-led** basis only and where the opportunity for densities and building heights that are greater than prevailing densities and building height is identified in a relevant statutory plan.*

**[SLA bold font emphasis]**

Previous and more recent permissions for density exceeding the 300 dph range at this site, was previously considered acceptable by both Dublin City Council and An Coimisiún Pleanála, having regard to the SDRA7 principles and the highly accessible site location within 500m of a strategic transport hub at Heuston Station and accessibility by other sustainable modes of transport to city centre amenities and employment opportunities.

The site is identified by the Development Plan to be an appropriate location for mid-height and tall landmark buildings, with higher density being the by-product. The extant permission already exceeds the 300 dph range. It was previously considered acceptable by both Dublin City Council and An Coimisiún Pleanála, having regard to the SDRA7 principles and being highly accessible by sustainable modes of transport. (See further discussion of SDRA 7 guiding principles in Section 10.3 below).

Given that the site conditions and the permitted building height, scale and massing have not materially changed (this having been corroborated in the planning authority’s s.247(7) confirmation), we expect that the proposed modifications to Blocks A, B1, B2 and C resulting in a marginal increase in density (+ 7no. units) of an already high density mixed use scheme will be acceptable to the planning authority.

The supplementary assessments that accompany the planning application demonstrate that no significant or new adverse planning or environmental impacts arise for the proposed development (e.g. visual impact, overlooking, overshadowing, heritage impacts, etc).

We refer the Planning Authority to the enclosed Letter, prepared by ARUP which confirms that the proposed amendments do not constitute material change or modifications to the technical information provided for the scheme permitted under DCC Reg. Ref. LRD6074/24-S3, including the Transportation Statement submitted.

#### 9.4.1.2 Specific Planning Policy Requirement 1 – Separation Distances

Separation distances of over 16m between is maintained between opposing windows serving habitable rooms in existing, permitted and proposed buildings. The proposed development is consistent with SPPR 1.

##### **Proposed Development**

It should be noted that there are no changes to the building footprint of the consented scheme, the separation distance between the permitted blocks and the distances from the consented scheme to existing neighbouring buildings remain as consented.

Notwithstanding the above, separation distances of at least 16m between are maintained between opposing windows serving habitable rooms in the consented scheme with proposed modifications. The proposed development is consistent with SPPR 1.

We refer the Planning Authority to the enclosed **Architectural Design Statement**, prepared by Reddy Architecture & Urbanism and to the **Sunlight & Daylight Report**, prepared by IN2 Consulting.

#### 9.4.1.3 Specific Planning Policy Requirement 2 – Minimum Private Open Space Standards for Houses

*It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:*

- 1 bed house 20 sq. m
- 2 bed house 30 sq. m
- 3 bed house 40 sq. m
- 4 bed + house 50 sq. m

##### **Proposed Development**

These standards relate only to houses and are therefore not applicable in this instance.

We refer the Planning Authority to Section 9.4.2 of this Report which demonstrates compliance with the relevant standards of the relevant Apartment Guidelines.

#### 9.4.1.4 Specific Planning Policy Requirement 3 – Car Parking

*It is a specific planning policy requirement of these Guidelines that:*

- i. *In **city centres and urban neighbourhoods of the five cities**, defined in Chapter 3 (Table 3.1 and Table 3.2) **car-parking provision should be minimised, substantially reduced or wholly eliminated**. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling.*

*Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision.*

*The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking*

#### **Proposed Development**

No additional car parking spaces are proposed. It is noted that the Dublin City Development Plan imposes maximum car parking standards for residential use, and that car parking may not be required at all where the site is immediately accessible to high capacity, high frequency public transport. Heuston Luas station is within 500m of this city centre site.

This is in accordance with SPPR 3 of the Compact Settlement Guidelines.

#### **9.4.1.5 Specific Planning Policy Requirement 4 – Cycle Parking and Storage**

*It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors.*

*The following requirements for cycle parking and storage are recommended:*

- i. Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general **minimum standard of 1 cycle storage space per bedroom** should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/ enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.*
- ii. Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.*

#### **Proposed Development**

Bicycle parking for the modified unit mix and additional apartments are proposed under the concurrent application for Revision 1, in accordance with SPPR 4 of the Compact Settlement Guidelines 2024. A breakdown of those proposals are provided below for information: -

<b>Type</b>	<b>*Permitted No. of Spaces</b>	<b>Combined Permitted + Proposed **</b>
Long-term	660	717
Short-term	72	83
Sheffield stands	8	10
<i>Total</i>	<i>740</i>	<i>810</i>

\*As required under Condition 7 (b) of DCC Reg. Ref. 6074/24-S3 and 5 (b) of DCC Reg. Ref. LRD6080/25-S3A

\*\* for proposed modifications under LRD Rev 1 and Rev 2 concurrent applications

**Table 6:** Permitted and Proposed Bicycle Parking Provision

We refer the Planning Authority to the enclosed **Letter**, prepared by ARUP Group which confirms that the proposed amendments do not constitute material change or modifications to the technical information provided for the scheme permitted under DCC Reg. Ref. LRD6074/24-S3, including the Transportation Statement submitted.

#### 9.4.1.6 Section 4.4 – Key Indicators of Quality Design and Placemaking

##### **3- Sustainable and Efficient Movement**

- a) *New developments should, as appropriate, include a street network (including links through open spaces) that creates a permeable and legible urban environment, optimises movement for sustainable modes (walking, cycling and public transport) and is easy to navigate.*
- b) *New developments should connect to the wider urban street and transport networks and improve connections between communities, to public transport, local services and local amenities such as shops, parks and schools, where possible.*
- c) *Active travel should be prioritised through design measures that seek to calm traffic and create street networks that feel safe and comfortable for pedestrians and cyclists.*
- d) *The quantum of car parking in new developments should be minimised in order to manage travel demand and to ensure that vehicular movement does not impede active modes of travel or have undue prominence within the public realm. Chapter 5 Development Standards includes a specific planning policy requirement (SPPRs) that addresses car parking rates in new residential developments.*

##### **Proposed Development**

The consented development offers pedestrians new permeability and an alternative walking route via the public plaza within the site and along the riverfront. This provides active engagement with the River Liffey and new visual connections across the river to the Heuston quarter.

The development site is well served by public transport. Heuston Station is approximately 200m from the site which provides national and regional rail services, as well as LUAS services.

On Parkgate Street a number of Dublin Bus routes are located which give further access across the city.

There are Dublin Bike Stations adjacent to the site, as well as many dedicated cycle lanes in the nearby roads that provide safe cycling for cyclists encouraging active travel.

No additional car parking spaces are proposed. It is noted that the Dublin City Development Plan imposes maximum car parking standards for residential use, and that car parking may not be required at all where the site is immediately accessible to high capacity, high frequency public transport. Heuston Luas station is within 500m of this city centre site.

##### ***(ii) Mix and Distribution of Uses***

- a) *In city and town centres and at high capacity public transport nodes and interchanges (defined in Table 3.8), development should consist of high intensity mix-use development (residential, commercial, retail, cultural and community uses) that responds in scale and intensity to the level of accessibility. At major transport interchanges, uses should be planned in accordance with the principles of Transport Orientated Development.*
- b) *In city and town centres, planning authorities should plan for a diverse range of uses including retail, cultural and residential uses and for the adaption and re-use of the existing building stock (e.g. over the shop living). It is also important to plan for the activation of outdoor spaces and the public realm to promote more liveable city and town centres. Much of this can be achieved though the implementation of urban enhancement and traffic demand management measures that work together to free up space for active travel and create spaces that invite people to meet, mingle and dwell within centres.*
- c) *In areas that are less central, the mix of uses should cater for local services and amenities focused around a hierarchy of local centres that support residential communities and with opportunities for suitable non-residential development throughout.*

- d) *In all urban areas, planning authorities should actively promote and support opportunities for intensification. This could include initiatives that support the more intensive use of existing buildings (including adaption and extension) and under-used lands (including for example the repurposing of car parks at highly accessible urban locations that no longer require a high level of private car access).*
- e) *It will be important to align the integration of land uses and centres with public transport in order to maximise the benefits of public transport.*
- f) *The creation of sustainable communities also requires a diverse mix of housing and variety in residential densities across settlements. This will require a focus on the delivery of innovative housing types that can facilitate compact growth and provide greater housing choice that responds to the needs of single people, families, older people and people with disabilities, informed by a Housing Needs Demand Assessment (HNDA) where possible. Development plans may specify a mix for apartment and other housing developments, but this should be further to an evidence-based Housing Needs and Demand Assessment*

### **Proposed Development**

The application site is within easy walking and cycling distance of the city centre and its myriad of amenities. It is also immediately adjacent to the gates of Phoenix Park and a host of other cultural and civic buildings and spaces, e.g. Collins Barracks, Criminal Court of Justice, Heuston Station, etc.

The development site is well served by public transport. Heuston Station is approximately 200m from the site which provides national and regional rail services, as well as LUAS services. On Parkgate Street a number of Dublin Bus routes are located which give further access across the city to a wide range of amenities in the city and city suburbs.

The consented development is itself a residentially-led mixed-use scheme, providing a range of café/restaurants, retail, multi-functional spaces for co-working, cultural, community and amenity uses at ground level. It also delivers new public open space and access to a riverside walk and the heritage features being retained on site.

The proposed modifications will provide a better mix of residential apartments and additional 7no. apartments, in a range of sizes and typologies, including universally accessed units, to ensure a diverse mix of dwellings.

We refer to further discussion of mixed use under the Z5 and Z9 land use zoning objectives for the site and SDRA7 guiding principles of the Dublin City Development Plan 2022-2028, in Section 10 of this report below.

We refer to the **Architectural Design Statement**, and **Housing Quality Assessment**, prepared by Reddy Architecture + Urbanism for further detail.

### ***(iii) Green & Blue Infrastructure***

- (a) *Plan for the protection, restoration and enhancement of natural features, biodiversity and landscapes, and ensure that urban development maintains an appropriate separation and setback from important natural assets. New development should seek to protect and enhance important natural features (habitats and species) within and around the site, should avoid the degradation of ecosystems and include measures to mitigate against any potential negative ecological impacts.*
- (b) *Plan for an integrated network of multifunctional and interlinked urban green spaces. This is addressed further in subsection (iii) Public Open Space below.*
- (c) *Promote urban greening and Nature-based Solutions (including Sustainable Drainage Systems and slow-the-flow initiatives) for the management of urban surface waters in all new developments and retrofitting in existing areas to ensure that the benefits of ecosystem services are realized. Planning authorities should adopt a nature based approach to urban drainage that uses soft-engineering techniques and native vegetation (including the protection of the riparian zone) to minimise the impact on natural river processes.*

- (d) *The use of Nature-based Solutions at ground level may not be possible on certain brownfield sites due to historic land contamination. In such cases, alternative solutions such as green roofs and walls can be considered.*

#### **Proposed Development**

Public open space is delivered under recently permitted LRD7064/24-S3 and LRD6080/25-S3A.

The most significant features of the permitted public amenity open space include the 'river walk' and public plaza, connecting to Parkgate Street and the River Liffey.

There is no change to the drainage scheme and associated green roof permitted under LRD6074/24-S3, LRD6042/23-S3A & SHD ABP-310567-21 as amended by LRD6080/25-S3A.

#### ***(iv) Open Space***

*Public open space provided as part of new development proposals. These spaces should be designed to retain and protect natural features and habitats of importance within the site and to maximise biodiversity gain. They should also form an integral part of the overall design. These spaces may be offered for taking in charge by the local authority following the completion of the development*

#### **Proposed Development**

As described above, public open space is delivered under LRD6074/24-S3, LRD6042/23-S3A & SHD ABP-310567-21 as amended by LRD6080/25-S3A.

The most significant features of the permitted public amenity open space include the 'river walk' and public plaza, connecting to Parkgate Street and the River Liffey.

The site is immediately accessible to Phoenix Park via Parkgate Street. The Phoenix Park, at c.700ha, is one of the largest enclosed recreational spaces within any of Europe's capital cities. It is open 24 hrs/day, 7 days/week. It hosts a range of attractions, including Dublin Zoo, Farmleigh, the Aras, and a range of passive and active recreational amenities.

The site also benefits from riverside amenities and proximity to the boat clubs and fishing opportunities along the Liffey corridor, at Island Bridge.

We discuss the public open space requirements of the Development Plan in reference to the Z9 land use zoning and design standards further in Section 10 of this report below.

We refer the Planning Authority to the enclosed **Natura Impact Statement**, prepared by Altemar, and to the landscape plans and particulars, prepared by Mitchell & Associates for detail.

#### ***(v) Responsive Built Form***

- (a) *New development should support the formation of a legible and coherent urban structure with landmark buildings and features at key nodes and focal points.*
- (b) *New development should respond in a positive way to the established pattern and form of development and to the wider scale of development in the surrounding area. The height, scale and massing of development in particular should respond positively to and enhance the established pattern of development (including streets and spaces).*
- (c) *The urban structure of new development should strengthen the overall urban structure and create opportunities for new linkages where possible.*
- (d) *Buildings should generally present well-defined edges to streets and public spaces to ensure that the public realm is well-overlooked with active frontages.*
- (e) *New development should embrace good modern architecture and urban design that is innovative and varied, and respects and enhances local distinctiveness and heritage.*
- (f) *Materials and finishes should be of high quality, respond to the local palette of materials and finishes and be highly durable.*

### **Proposed Development**

The proposed modifications to Blocks A, B1, B2 and C do not result in a materially different scheme to what is already consented, with respect to building form, height and massing, under LRD6074/24-S3, LRD6080/25-S3A and LRD6042/23. This is confirmed in the planning authority's s.247(7) determination that no further consultation is required, as the consented scheme with proposed modifications remains substantially the same.

The enclosed **Addendum Landscape and Visual Impact Assessment Report**, prepared by ARC confirms that the proposed amendments will not change the extent of visibility or visual effects the consented scheme or otherwise permitted buildings.

The enclosed **Addendum Architectural Heritage Impact Assessment**, prepared by ARC confirmed that: -

*The proposed modifications to the permitted development do not involve any works to structures of architectural heritage value, whether they are protected structures or not. Nor are the proposed modifications to the development likely to result in any material or perceived effects on the setting of structures of architectural heritage value over and above effects occasioned by the permitted development. Therefore, the proposed modifications will not give rise to any direct impact on the architectural heritage of any structures on the subject site or on their setting.*

We refer the Planning Authority to the enclosed **Addendum Architectural Heritage Impact Assessment** and **Addendum Landscape and Visual Impact Assessment Report**, both prepared by ARC, and to the **Architectural Design Statement**, prepared by Reddy Architecture + Urbanism for further design, townscape and conservation detail.

### **Policy and Objective 5.1 – Public Open Space**

It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.

In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area.

In the case of **sites that contain significant heritage**, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. **The 10-15% range shall not therefore apply to new development in such areas.**

In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site

### **Proposed Development**

As described above, public open space is delivered under LRD6074/24-S3, LRD6042/23-S3A & SHD ABP-310567-21 as amended by LRD6080/25-S3A.

The most significant features of the permitted public amenity open space include the ‘river walk’ and public plaza, connecting to Parkgate Street and the River Liffey.

The site is immediately accessible to the expansive Phoenix Park via Parkgate Street. It also benefits from riverside amenities and proximity to the boat clubs and fishing opportunities along the Liffey corridor, at Island Bridge.

We discuss the public open space requirements of the Development Plan in reference to the Z9 land use zoning and design standards further in Section 10 of this report below.

#### 9.4.2 Sustainable Urban Housing: design Standards for New Apartments, Guidelines for Planning Authorities 2025

The Apartment Design Guidelines seek to implement the national and regional strategic planning policies and objectives identified in previous sections of this report, through ‘*Specific Planning Policy Requirements*’ (SPPRs) and other recommended policy.

The proposed modifications are fully consistent with the minimum SPPRs of the latest Apartment Guidelines 2025, which allow for greater flexibility to encourage apartment development.

##### 9.4.2.1 Apartment Mix (SPPR 1)

There is no apartment mix threshold under SPPR 1 of the Apartment Guidelines 2025.

SPPR 1 of the Apartment Guidelines 2023, however, states:

*“(A) With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. **There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.***

*“(B) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.*

(SLA emphasis in bold)

#### Proposed Development

A breakdown of the permitted unit mix is provided below: -

Block	Studio	1-Bed	2-Bed (3Pers)	2-Bed (4-Pers)	3-Bed	Total
Block A	26no.	118no.	26no.	27no.	1no.	198no.
Block B2	1no.	1no.	8no.	38no.	-	48no.
Block B1 & C	-	178no.	24no.	114no.	-	316no.
Total	27no.	297no.	58no.	179no.	1no.	562no.

**Table 7:** Residential Unit Mix Overall Scheme – Permitted (all units).

Proposed modifications (Revision 1) to the residential unit mix comprise: -

- Permitted 2no. 2-beds (total 6no.) to proposed **4no. studios (total 12no.)**, repeated across L07 – L09 (**3 levels**) in Blocks B1 & C.

- Permitted mezzanine residential amenity (151sqm) to proposed **residential amenity (44sqm)** and **1no. 3-bed (4-person)** in Block B1.
- Alterations to elevation **fenestration** and internal **floor plan reconfiguration** of 2-bed (4-person) unit, to create 3-bed (4-person) unit, repeated across L00-L08 (9 levels) in Block C (**total 9no.**).
- Alterations to elevation **fenestration** and internal **floor plan reconfiguration** of 2-bed (4-person) unit, to create **3-bed (4-person) unit**, repeated across L01-L11 (11 levels) in Block B1 (**total 11no.**).
- Internal **floor plan reconfiguration** of 2-bed (4-person) unit, to create **3-bed (4-person) unit**, repeated across L01-L27 (27 levels) in Block A (**total 27no.**).

The table below summarises the proposed unit mix in combination with the permitted scheme: -

Block	1-Bed Studio	1-Bed	2-Bed (3Pers)	2-Bed (4-Pers)	3-Bed (4-Pers)	3-Bed (5 Pers)	Total
Block A	26no.	118no.	26no.	-	27no.	1no.	198no.
Block B2	1no.	1no.	8no.	38no.	-	-	48no.
Block B1 & C	12no.	178no.	24no.	88no.	21no.	-	323no.
<b>Total</b>	<b>39no.</b>	<b>297no.</b>	<b>58no.</b>	<b>126no.</b>	<b>48no.</b>	<b>1no.</b>	<b>569no.</b>

**Table 8:** Residential Unit Mix Overall Scheme – Permitted and Proposed Dwelling Mix (all units). However, flexibility allowed for unchanged Block A ‘BTR’ unit types permitted under the Apartment Guidelines 2020 in force at that time.

The consented development, in combination with the proposed modifications, is accordance with SPPR 1 of the Apartment Guidelines 2025.

We refer the Planning Authority to the **Architectural Design Statement** prepared by Reddy Architecture and Urbanism for further schedule of accommodation details.

#### 9.4.2.2 Minimum Apartment Floor Area

<b>Minimum Apartment Floor Areas:-</b>	<b>2023</b>	<b>2025</b>
Studio Apartment (1 person)	37sqm	<u>32sqm</u>
1-bedroom apartment (2 persons)	45sqm	45sqm
2-bedroom apartment (3 persons)	63sqm	63sqm (max.10% does not apply)
2-bedroom apartment (4 persons)	73sqm	73sqm
<u>3-bedroom apartment (4-persons)</u>	<u>n/a</u>	<u>76sqm</u>
3-bedroom apartment (5 persons)	90sqm	90sqm

##### **Proposed Development**

The proposed modifications are consistent with the minimum floor areas identified under **SPPR 2** of the Apartment Guidelines 2025.

The **Housing Quality Assessment** (HQA), prepared by Reddy Architecture & Urbanism, enclosed with this application confirms this to be the case.

#### 9.4.2.3 Safeguarding Higher Standards

The Apartment Guidelines 2025 requires that at least 25% of the apartment units within this scheme (of more than 10 units) shall exceed the SPPR2 minimum standards by a factor of 10%.

##### **Proposed Development**

The proposed development exceeds the minimum floor area requirements of the Apartment Guidelines 2025, to safeguard higher residential amenity standards.

The **Housing Quality Assessment** (HQA), prepared by Reddy Architecture & Urbanism, enclosed with this application confirms this.

#### 9.4.2.4 Dual Aspect

The Apartment Guidelines 2025 **SPPR 3** requires that at least 25% of the apartment units within this scheme shall be dual aspect.

##### **Proposed Development**

In this central and accessible urban location the consented scheme with proposed modifications achieves **47% dual aspect**, well in excess of the minimum standards.

The **Housing Quality Assessment** (HQA), prepared by Reddy Architecture & Urbanism, enclosed with this application confirms this. We refer also to the **Architects Design Statement** that illustrates how the dual aspect is achieved for each of the proposed units.

#### 9.4.2.5 Floor to Ceiling Heights

The Apartment Guidelines 2025 **SPPR 4** requires apartment floor to ceiling heights of min. 2.7m for this scheme.

##### **Proposed Development**

The permitted ground floor apartments in Blocks B1 and C achieve the minimum floor to ceiling heights of 2.7m. No modifications to this are proposed.

There are no ground floor apartments in Block B2 or Block A.

Please refer to enclosed section drawings prepared by Reddy Architecture + Urbanism for details.

#### 9.4.2.6 Units Per Core

The Apartment Guidelines 2025 **SPPR 5** notes that there shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number of units per floor per core.

##### **Proposed Development**

Please refer to enclosed floor plan drawings prepared by Reddy Architecture + Urbanism for details.

#### 9.4.2.7 Internal Storage

Appendix 1 of the Apartment Guidelines 2025 outline the minimum storage space requirements for apartments as follows: -

##### **Minimum storage space requirements<sup>f</sup>**

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

<sup>f</sup> Note: Where secure, allocated storage is provided in addition to that within individual units, it may be used to satisfy up to half of the minimum storage requirement for individual apartment units, but shall not serve to reduce the minimum floor area required to be provided within each individual apartment unit, as set out in these Guidelines.

##### **Proposed Development**

Storage is provided in accordance with the minimum requirements outlined in Appendix 1 of the Apartment Guidelines 2025.

Refer to enclosed Housing Quality Assessment, floor plan and apartment type drawings, prepared by Reddy Architecture + Urbanism.

#### 9.4.2.8 Private Open Space

The following are the applicable minimum private and communal amenity space requirements under Appendix 1 of the Guidelines that apply to the 'Build to Sell' apartments: -

Minimum Floor Areas for Communal Amenity Space	
Studio	4 sq m
One bedroom	5 sq m
Two bedroom	7 sq m
Three bedroom	9 sq m

**Table 9:** Minimum private and communal amenity space requirements of the Apartment Guidelines

Section 3.8 of the Guidelines state that: -

*The number of units without direct access to private amenity space within apartment schemes should not exceed 50%. Where the location and characteristics of the site allow for higher levels of private amenity space provision, for example on larger sites or in more suburban settings, higher levels of private amenity space should be provided.*

##### **Proposed Development**

Private amenity space has been provided for all units in Block B1, B2 & C, with the exception of the proposed 6no. additional units at levels 07-09.

The 21no. 3-bed 4-person apartments in Blocks B and C have been provided with 7sqm private balconies, and an additional allowance of 2 sqm per unit has been allowed for in the communal open space calculations.

The 27no. 3-bed 4-person apartments in Block A have not been provided with private balconies. An additional 18 sqm per unit has been allowed for in the communal open space calculations.

Just c. 8% of the ‘build to sell’ apartments do not have direct access to private amenity space.

This is in accordance with Section 3.8 of the Apartment Guidelines 2025.

We refer to Section 5.12 of the enclosed Architectural Design Statement and HQA- Amendment 2, contained within the design statement, prepared by Reddy Architecture + Urbanism for details regarding the quantum provided.

**9.4.2.9 Communal Open Space**

The following are the applicable minimum communal amenity space requirements under Appendix 1 of the Guidelines that apply to the ‘Build to Sell’ apartments: -

Minimum Floor Areas for Private Amenity Space	
Studio	4 sq m
One bedroom	5 sq m
Two bedroom	7 sq m
Three bedroom	9 sq m

**Table 10:** Minimum private and communal amenity space requirements of the Apartment Guidelines

The consented development combined with the proposed modifications (resulting in 569no. apartments total, of which 145no. remain ‘BTR’) requires a total of c. 2,942sqm of communal open space to meet relevant requirements of the Apartment Guidelines 2025: -

Unit Type	Studio*	1-bed	2-bed (3-Pers)	2-bed (4-Pers)	3-bed (4-Pers)**	Build to sell units (Block A)***	Build-to-Rent units (Block A)****
No. Units	13no.	179no.	32no.	126no.	21no.	53no.	145no.
Required Communal Open Space	100sqm	895sqm	192sqm	882sqm	231sqm	642sqm	N/A
<b>Total</b>							<b>2,942sqm</b>

\* 6no. studios have no private amenity, 8sqm of external communal space is allocated to these units

\*\* An allowance of an additional 2sqm per unit is allocated to 3-bed apartments with 7sqm of private open space

\*\*\* Build to Sell units in Block A provided additional communal open space where private open space is not provided

\*\*\*\* Build to Rent apartments, permitted under 2020 Apartment Guidelines have access to c. 827sqm of external and internal amenity

**Table 11:** Permitted and Proposed Communal Open Space Requirement (all units). Flexibility allowed for unchanged Block A ‘BTR’ unit types permitted under the Apartment Guidelines 2020 in force at the time.

The consented development, as modified, delivers c. **3,204sqm of external communal amenity space** and c. 565sqm of internal communal amenity space. Breakdown provided below.

Provided	Block A	Block B1	Block B2	Block C	Total
External	343sqm	1,725sqm	371sqm	7645sqm	3,204sqm
Internal	398qm	115sqm	52sqm	-	565sqm
<b>Total</b>					<b>3,769sqm</b>

**Table 12:** Permitted and Proposed Communal Open Space Provision

2,942sqm of external communal amenity space is provided for the 424no. build to sell apartments. The 145no. build to rent apartments benefit from 262sqm of external communal amenity space and 565sqm of internal amenity.

We refer the Planning Authority to Section 5.8 of the **Architectural Design Statement**, prepared by Reddy Architecture and Urbanism, for further details.

#### 9.4.2.10 Car and Bicycle Parking

We refer to compliance with SPPR3 (car parking) and SPPR4 (bicycle parking) of the Compact Settlement Guidelines 2024, discussed previously under Sections 9.4.1.4 and 9.4.1.5 of this planning consistency report.

#### 9.4.2.11 Building Life Cycle Report

The Apartment Guidelines require that planning applications for apartment development include a Building Lifecycle Report.

A **Building Life Cycle Report**, prepared by Aramark, was submitted under DCC Ref. LRD6074/24-S3, the findings of same remain.

#### 9.4.3 Urban Development & Building Heights Guidelines for Planning Authorities (2018)

It is highlighted from the outset that no change to the permitted building height or massing is proposed as part of these modifications to the consented scheme.

The Building height Guidelines identify that increasing prevailing building height has a critical role to play in addressing the delivery of more compact urban growth, which is a key objective of the NPF. The Guidelines set out a number of Strategic Planning Policy Requirements (SPPR) which are noted as taking precedence over any conflicting policies and objectives in the Development Plans.

Section 3.1 of the Guidelines acknowledges that there is a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport links. Section 3.1 requires Planning Authority's to apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas:

- *Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?*
- *Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines?*
- *Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?*

The proposed development seeks proposed modifications to a consented LRD scheme, which does not include any material change to the permitted building height or massing.

Within the consented scheme permitted Blocks B and C range from 8 to 13 storeys in height. Block A is a permitted 29-storey tall landmark building. The building height of the consented scheme has already been determined by the planning authority and An Coimisiún Pleanála to be consistent with the relevant criteria set out in Section 3.2 of the Building Height Guidelines. The proposed modifications to the apartment mix and uplift do not change the building height of the permitted buildings.

We refer the Planning Authority to Appendix B of this report which provides a comparative assessment of Section 3.2 of the Building Height Guidelines for further completeness.

We refer the Planning Authority generally to the accompanying **Architectural Design Statement** and elevational drawings prepared by Reddy Architecture & **Urbanism and Landscape and Visual Impact Assessment**, prepared by ARC which accompany this application.

#### 9.4.4 Design Manual for Urban Roads and Streets (2013)

The stated objective of Design Manual for Urban Roads and Streets (DMURS) is to achieve better street design in urban areas. This will encourage more people to choose to walk, cycle or use public transport by making the experience safer and more pleasant.

The proposed development does not include any material changes to the site works for the wider consented scheme at this site, including vehicular, bicycle or pedestrian site access or pedestrian priority of ground plane.

## 10 STATUTORY DEVELOPMENT PLAN – STATEMENT OF CONSISTENCY

The **Dublin City Council Development Plan 2022-2028**, as varied, (hereafter referred to as the Development Plan) is the statutory land-use plan governing the subject lands at this time.

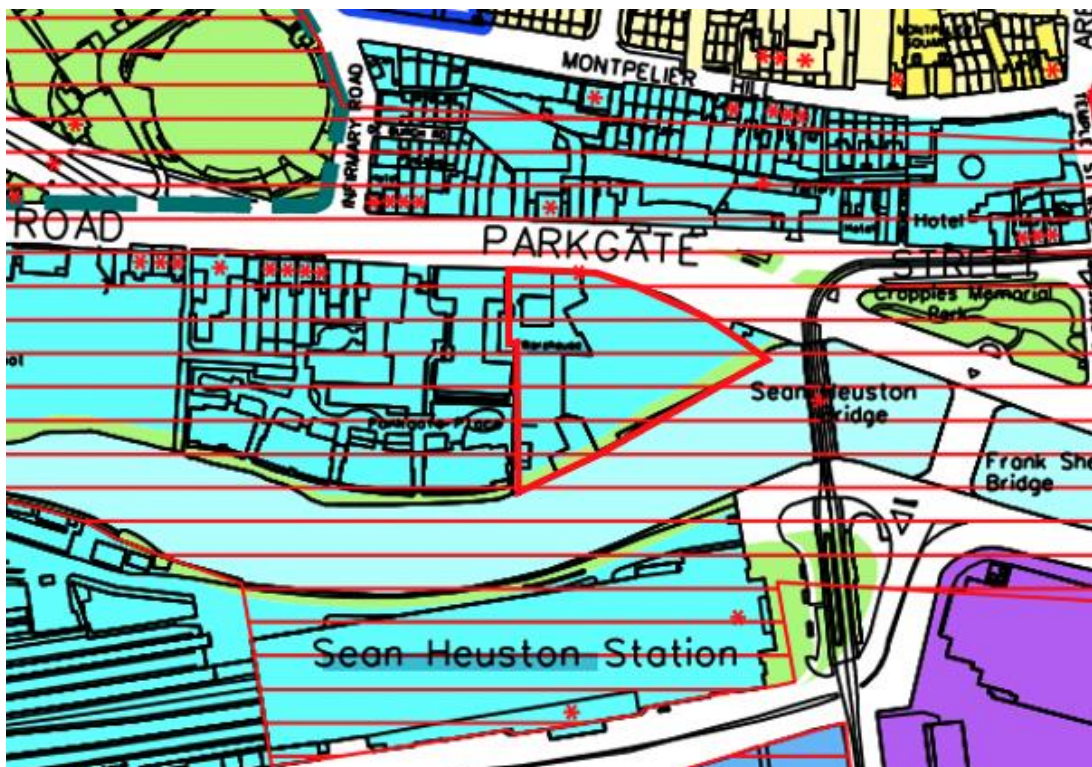
The application site is not subject of an Local Area Plan (LAP) or Strategic Development Zone (SDZ) designation.

This Statement of Consistency is understood to be intended to provide the Planning Authority with adequate comfort that the policies and objectives of the Statutory Development Plan have been duly complied with in devising the proposed modifications to the consented scheme.

### 10.1 LAND USE ZONING

Under the current Development Plan, the same majority of the site remains subject to the Zoning Objective “**Z5 – City Centre**”. The lands in the immediate vicinity of the site are also thus zoned.

A linear strip along the river edge remains zoned for open space. The riverside amenity space of the consented scheme, within this zone, is not impacted by the proposed modifications subject of this planning application.



**Figure 2:** Extract, Map E, Dublin City Development Plan 2022 - 2028 (SLA overlay outlines approximate application site area outlined in red). We refer the Planning Authority to the accompanying Site Location Map prepared by Reddy Architecture & Urbanism for the exact extent of the site area of the consented scheme and the location of the proposed amendments within this site.

Zoning objective **Z5** seeks:

*To consolidate and facilitate the development of the central area, and to identify, reinforce, strengthen and protect its civic design character and dignity.*

The purpose of the zoning is to promote intensive and varied mixed-use development, horizontally and vertically, to sustain life within the city centre through day and night. The Plan identifies “*retail, commercial, residential*” as being desirable to promote within the general mix of sustainable uses.

‘Residential’ use is permissible use under the Z5 zoning.

The building footprint, with permitted mix of uses, is contained within the Z5 zoning.

The zoning objective does not impose any specific ratio in respect of the mix of uses to be achieved on site.

The proposed modifications primarily relate a reconfiguration of the apartment mix and a modest uplift of 7no. units.

The ratio of the permitted mix of uses does not materially change as a result of the proposed modifications.

**10.2 STRATEGIC DEVELOPMENT & REGENERATION AREA (SDRA) 7: HEUSTON AND ENVIRONS**

The site is located at a site within Heuston & Environs Strategic Development & Regeneration Area (SDRA 7).

In relation to **land use & activity** within SDRA 7, the Guiding Principles state: -

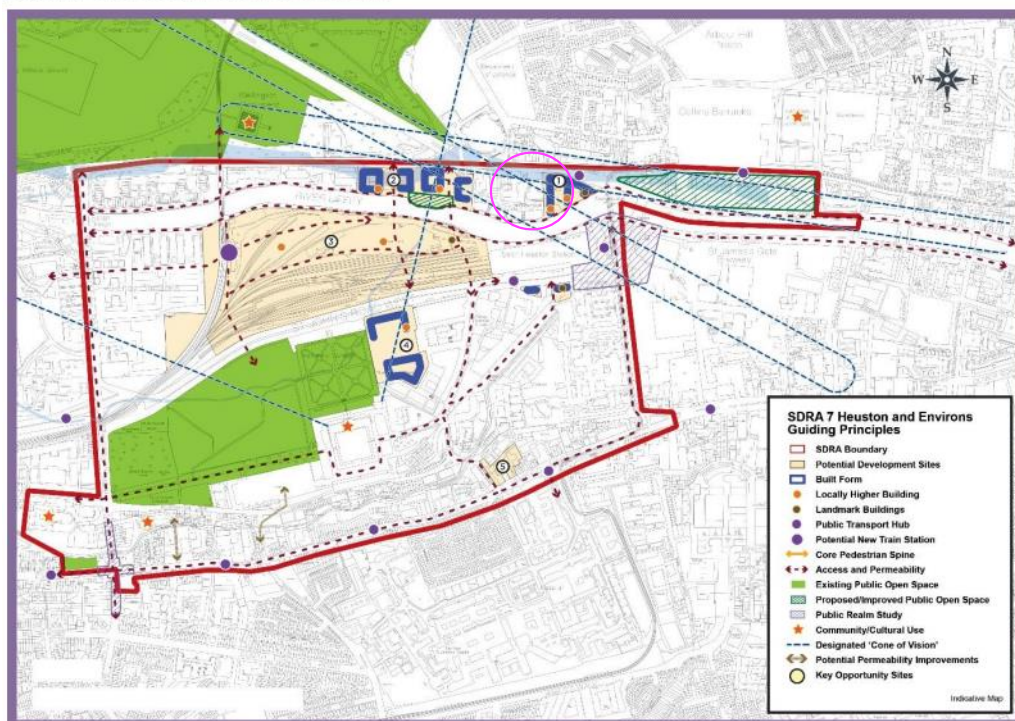
*To realise the creation of a **new mixed-use district** focused on sustainable modes of transport through the regeneration of the Heuston lands **that incorporates a mix of residential and office uses complemented by culture, retail and service elements.***

Additionally, there is a requirement: -

*To recognise the **need for community uses** and public spaces to complement the future residential and office development in the Heuston area.*

Neither the written text nor Figure 13-10 of the City Development Plan prescribes the ratio or mix of particular types of permissible residential or commercial use for the 5no. potential development sites identified within the SDRA area, including (1) the subject site at Parkgate Street.

**Figure 13-10: SDRA 7 Heuston and Environs**



**Figure 3:** Extract from Figure 13-10 of the Dublin City Development Plan 2022-2028, including subject site.

To date, Dublin City Council has been satisfied that the quantum and mix of uses permitted (residential, office, co-working space, retail, café/restaurant, cultural and amenity) represent an appropriate and reasonable mix of uses.

The proposed modifications primarily relate a reconfiguration of the apartment mix and a modest uplift of 7no. units.

There are no alteration to the non-residential elements proposed.

We would submit that the proposed modifications do not affect or undermine the already consented mixed uses at ground and mezzanine floors of the wider scheme. The consented scheme, with proposed modifications, will continue to deliver the same reasonable mix of residential, commercial, community and cultural uses, and provide an active frontage to Parkgate Street.

### 10.3 SDRA 7 GUIDING PRINCIPLES FOR HICKEY'S KEY OPPORTUNITY SITE

The Development Plan identifies the subject site as an SDRA 7 'Key Opportunity Site' and sets out Guiding Principles for same, as follows: -

*Development on this site should provide active frontage to Parkgate Street with active non-residential land use along this frontage. A riverside walkway should be provided and public access to the river should be allowed at all hours of the day.*

*Heights should be 6-8 storeys on this site while locally higher buildings could be located to the rear of the site at the identified locations. The site is suitable for the accommodation of a landmark building in the order of 30 storeys at its eastern end subject to the quality of the design and considerations being in accordance with Appendix 3 of the development plan.*

The consented scheme with the proposed modifications continues to comply with these guiding principles in the same manner:

- Permitted building form and height does not materially change.
- The permitted riverside walkway will continue to be publicly accessible during normal public park times.
- The mix of uses, consented at ground floor level in the wider scheme to activate Parkgate Street, includes café/restaurant, retail, community/cultural and public and residential communal amenity space and is not materially changed by the proposed modifications.

### 10.4 CONSERVATION AREAS

The site is located within a larger 'Conservation Area' designated in the Dublin City Development Plan along the River Liffey and its banks and quays, as evident in Figure 2.

For the avoidance of doubt, the proposed modifications to the consented scheme, subject of this LRD application, do not involve any new works to Protected Structures or other historic buildings / structures. These were originally consented under ABP-306569-20, and again more recently under LRD 6074/24-S3. The details of works to the River Wall were agreed with the Planning Authority at compliance stage under ABP-306569-21. This was reconfirmed under the LRD6074/24 application, recently permitted.

The significance of the site within the designated Conservation Area along the Liffey banks and the heritage significance of the existing buildings and structures on site, and their conservation, integration or demolition as part of the consented scheme, has been established under ABP-306569-20, and again more recently under LRD 6074/24-S3. This is the extant permission pertaining to the conservation, refurbishment, repair and adaption of the existing protected structures and other historic structures on site, which is not changed as a result of the proposed modifications.

The demolition of all other structures within the former Hickey's Fabrics site, including the large single storey warehouse building with curved wall to Parkgate Street and all warehouse internal walls and partitions including the southern brick wall running parallel to the interior of the riverside stone wall,

a small two storey building adjacent to the entrance stone archway and the former 2-storey detached house (Parkgate House) at the north west corner of the site, and other miscellaneous structures, is permitted under ABP-306569-20, and again more recently under LRD 6074/24-S3.

The refurbishment and reuse of the Protected Structures has been welcomed previously by the planning authority and An Coimisiún Pleanála. It was considered that an appropriate balance had been achieved between protecting the historical significance of the site and enabling its redevelopment. The proposed modifications will further support the implementation of the consented scheme and the achievement of important conservation works.

No further amendments to site works, demolition or conservation works to protected structures, including the river wall (consented under original SHD ABP-306569-20 and more recently LRD6074/24) are proposed as part of this application.

We refer to the enclosed **Addendum Architectural Heritage Impact Assessment**, prepared by ARC Architectural Consultants Limited accompanies this application.

## 10.5 CLIMATE ACTION

The following climate action policies of the Development Plan are relevant to the design of new buildings:

**CA8** (*Climate Mitigation Actions in the Built Environment*) and **CA9** (*Climate Adaption Actions in the Built Environment*) are almost identical policies, requiring that development proposals shall demonstrate:

*“... sustainable [climate adaptation, circular] design principles for new buildings/services/site.*

*The Council will promote and support development which is resilient to climate change. This would include:*

- a. measures such as green roofs and green walls to reduce internal overheating and the urban heat island effect;*
- b. ensuring the efficient use of natural resources (including water) and making the most of natural systems both within and around buildings;*
- c. minimising pollution by reducing surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems (SuDS);*
- d. reducing flood risk, damage to property from extreme events– residential, public and commercial;*
- e. reducing risks from temperature extremes and extreme weather events to critical infrastructure such as roads, communication networks, the water/drainage network, and energy supply;*
- f. promoting and protecting biodiversity [, novel urban ecosystems ] and green infrastructure.*

### **CA10 Climate Action Energy Statement:**

*“All new developments involving 30 residential units and/or more than 1,000sq.m. of commercial floor space, or as otherwise required by the Planning Authority, will be required to submit a Climate Action Energy Statement as part of the overall Design Statement to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development.”*

### **Proposed Development**

The consented development, with or without the proposed modifications, comprising brownfield regeneration on the edge of the city centre, is representative of climate resilient development.

The consented scheme includes a range of sustainable design principles to ensure resilience to climate change, which continue to be observed with the proposed modifications.

We refer the Planning Authority to the enclosed **Climate Action and Energy Statement**, prepared by IN2 Engineering Partnership, for further discussion.

## 10.6 QUALITY HOUSING AND SUSTAINABLE NEIGHBOURHOODS

**QHSN2** seeks that new residential development is:

*“To have regard to the DEHLG Guidelines on ‘Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities’ (2007), ‘Sustainable Urban Housing: Design Standards for New Apartments’ (2020), ‘Sustainable Residential Development in Urban Areas’ and the accompanying ‘Urban Design Manual: A Best Practice Guide’ (2009), Housing Options for our Aging Population 2020 and the Design Manual for Urban Roads and Streets’ (DMURS) (2019).”*

### **Applicant’s Response**

The proposed development has had regard to the relevant Guidelines identified in QHSN2, in particular the Apartment Guidelines (2023 and 2025) and Compact Settlement Guidelines (2024). The consistency of the consented scheme with the proposed modifications, with these Guidelines, is discussed the preceding sections of this Report.

**QHSN10** (sustainable density) seeks:

*“To promote residential development at sustainable densities throughout the city in accordance with the Core Strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.”*

### **Proposed Development**

The proposed development seeks to provide an additional 16no. units within the consented scheme, resulting in a marginally increased total of 569no. units on a net site area of c. 0.82ha. The resultant density in this instance is **c. 694 dw/ha**.

This represents a minor overall uplift from previously permitted 685 dw/ha at this site, within a designated Strategic Development and Regeneration Area (SDRA7) where potential for high density mid-rise and landmark buildings has been identified in the Development Plan.

The consented scheme was previously considered acceptable to both Dublin City Council and An Coimisiún Pleanála, being representative of strategic high density and high quality development of a central brownfield site, within a Strategic Development and Regeneration Area (SDRA7) and identified as a suitable opportunity site for mid-rise and landmark buildings, and being highly accessible by sustainable modes of transport.

It is submitted that the consented scheme with proposed modifications remains consistent with current strategic planning policy and guidance, to actively promote higher density and building height at this urban brownfield regeneration sites.

The proposed modifications to the consented high density scheme does not give rise to any new or significant adverse impact on residential (overlooking, overshadowing) or visual amenity, architectural heritage or environmental infrastructure. We refer to the relevant enclosed plans and particulars, which demonstrate this.

We refer to further discussion on the Development Plan density objectives below.

**QHSN11** (15-minute city concept) seeks:

*“To promote the realisation of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, inter-generational and accessible, safe and inclusive public spaces*

*served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible.”*

### **Proposed Development**

The consented scheme with proposed modifications continues to support the concept of a 15-minute city.

The proposed modifications will add 16no. new residential units to an otherwise consented mixed use scheme.

The consented scheme with the proposed modifications will achieve compact growth through more intensive use of an urban brownfield site on the western edge of Dublin City Centre.

The site location benefits from a range of local city centre services and amenities within easy walking and cycling distance. A Dublin Bikes station is located directly beside the subject site at Heuston Bridge. The consented scheme with proposed amendments also makes appropriate provision for on-site bicycle parking for residents and visitors.

The site is highly accessible to high frequency and capacity public transport services. The site is approximately 200m from Heuston Station, major infrastructure hub.

It provides intercity and commuter rail services to west Dublin and the west and south west of Ireland.

Heuston Red Line LUAS stop is approximately 180m from the subject site which gives convenient access to the city centre and the IFSC in one direction and access to Tallaght and west Dublin in the other direction.

Numerous Dublin Bus stops are also conveniently located on Parkgate Street directly adjacent the site (Dublin Bus numbers 25, 26, 66, 66a, 66b, 66e, 67 and 69).

**QHSNO11** (universal access) seeks:

*“To ensure that 50% of apartments in any development that are required to be in excess of minimum sizes should be designed to be suitable for older people/mobility impaired people, people living with dementia and people with disabilities in accordance with the guidelines set out in the Universal Design Guidelines for Homes in Ireland 2015, the DHLG&H’s Design Manual for Quality Housing 2022 and the DHP&LG & DH’s Housing Options for Our Ageing Population Policy Statement 2019.”*

### **Proposed Development**

Consideration has been given to the accessibility for all building users. Moving through and around the site meets the requirements of Part M and where possible exceeds them in pursuit of best practice. Level access will be provided to the scheme and to all external communal amenity spaces. This is being done in conjunction with DAC consultants MSA.

A number of apartments within the proposed scheme will be designed in detail to comply with Objective QHSNO11 of the Dublin City Development Plan.

We refer the Planning Authority to Section 5.22 the enclosed **Architectural Design Statement**, prepared by Reddy Architecture + Urbanism for details.

**QHSN34** (social and affordable housing) seeks:

*“To promote the provision of social, affordable purchase, cost rental and rental housing in accordance with the Council’s Housing Strategy, Part V of the Planning and Development Act, as amended by the Affordable Housing Act 2021 and government policy as outlined in the DHLGH ‘Social Housing Strategy 2020’ and support the realisation of public housing.”*

### **Proposed Development**

We can confirm that the site was purchased within the protected period of 1 September 2015 to 31 July 2021. We refer the Planning Authority to the enclosed Part V Validation Letter issued by Dublin City Council.

**QHSN36** (high quality apartment development) seeks:

*“To promote the provision of high-quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood.”*

**Proposed Development**

We refer to previous discussion of compliance with the Apartment Design Guidelines standards, in Section 9.4.2 of this report.

We refer also to discussion of compliance with the Development Plan design standards further below.

The proposed units are well catered for in respect of benefitting from high levels of amenity, both within each individual apartment (generous floor areas and private balconies/ terraces) and in the wider private communal areas (ground and roof level courtyards and internal amenity spaces) and public amenities (public square and riverwalk and other multi-functional community/cultural spaces) on site, and the public amenities in the immediately surrounding neighbourhood (Phoenix Park, local services, cultural attractions, etc).

We refer also to the Section 13 of this Report, for further details.

**QHSN38** (Housing Strategy), seeks:

*“To encourage and foster the creation of attractive, mixed use, sustainable residential communities which contain a wide variety of housing and apartment types, sizes and tenures, in accordance with the Housing Strategy and HNDA, with supporting community facilities and residential amenities.*

*Further detail in regard to unit mix is set out in Chapter 15: Development Standards. Unit mix requirements for the Liberties and the North Inner City are set out in Section 15.9.1 and Table 37 of the Housing Strategy in Appendix 1.”*

**SC12 (Housing Mix)** seeks:

*“To promote a variety of housing and apartment types and sizes , as well as tenure diversity and mix, which will create both a distinctive sense of place in particular areas and neighbourhoods, including coherent streets and open spaces and provide for communities to thrive.”*

**Proposed Development**

The consented scheme, in combination with the proposed amendments, provides a wide variety of apartment typologies for future residential.

We note that a Part V Agreement will be entered in to post-planning by way of Condition subject to grant of permission.

The site is not located within the Liberties or North Inner City, identified in the HDNA for the provision of a proportion of 3-bed units.

Overall, the varied size and typology of apartment units permitted under LRD6074/24-S3, LRD6042/23-S3A & SHD ABP-310567-21 as amended by LRD6080/25-S3A and proposed under this application, is appropriate to this centrally located, brownfield urban site. It is consistent with the Development Plans objective to encourage a wide variety of dwelling types, sizes and tenures, which will support the establishment of sustainable residential community at the western edge of the city centre.

**QHSN39** (property management) seeks:

*“To promote efficient and effective property management in order to secure the satisfactory upkeep and maintenance of communal areas in the context of the Multi Unit Developments Act 2011 and the Property Services (Regulation) Act 2011.”*

**Proposed Development**

A **Property Management Strategy Report** prepared by Aramark was submitted under DCC Ref. LRD6074/24-S3, the findings of same remain.

**10.7 SUSTAINABLE MOVEMENT AND TRANSPORT**

**SMT1** (modal shift) seeks:

*“To continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport, and to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives to achieve compact growth.”*

**SMT5** (mobility hubs) seeks:

*“To support the development of mobility hubs at key public transport locations and local mobility hubs in tandem with new developments to include shared car and micro mobility initiatives, creating a vibrant, accessible and liveable place to support the transportation experience.”*

**SMT7** (travel plans) seeks:

*“To require the preparation and submission of travel plans for new and existing developments as part of the planning application process including residential, school, workplace etc.”*

**SMT11** (pedestrian network) seeks:

*“To protect, improve and expand on the pedestrian network, linking key public buildings, shopping streets, public transport points and tourist and recreational attractions whilst ensuring accessibility for all, including people with mobility impairment and/or disabilities, older persons and people with children.”*

**Proposed Development**

The proposed development aims to promote a modal shift from private car use towards increased use of more sustainable forms of transport such as active mobility and public transport.

No additional car parking spaces are proposed. It is noted that the Dublin City Development Plan imposes maximum car parking standards for residential use, and that car parking may not be required at all where the site is immediately accessible to high capacity, high frequency public transport. Heuston Luas station is within 500m of this city centre site.

Bicycle parking for the modified unit mix and additional apartments are proposed under the concurrent application for Revision 1.

The consented scheme with the proposed modifications is well placed to support investment in and benefit from existing walking, cycle and public transport facilities, to realise a shift to more sustainable travel modes.

**SMT2** (electric vehicle infrastructure) seeks:

*“To support the decarbonising of motorised transport and facilitate the rollout of alternative low emission fuel infrastructure, prioritising electric vehicle (EV) infrastructure.”*

No modifications to the consented car parking and EV parking arrangements are proposed under this application.

**SMT7** (travel plans) seeks:

*“To require the preparation and submission of travel plans for new and existing developments as part of the planning application process including residential, school, workplace etc.”*

We refer the Planning Authority to the enclosed **Letter**, prepared by ARUP Group which confirms that the proposed amendments do not constitute material change or modifications to the technical information provided for the scheme permitted under DCC Reg. Ref. LRD6080/25-S3A, including the Transportation Statement submitted.

**SMT11** (pedestrian network) seeks:

*“To protect, improve and expand on the pedestrian network, linking key public buildings, shopping streets, public transport points and tourist and recreational attractions whilst ensuring accessibility for all, including people with mobility impairment and/or disabilities, older persons and people with children.”*

The proposed development does not alter the pedestrian priority site layout of the consented scheme or how it integrates with the local pedestrian and cycle network in the public road.

The wider scheme, with site works most recently permitted under LRD6074/24-S3 provides for a publicly accessible ‘river walk’. This incorporates the full length of the riverside stone wall and the turret, square tower and stone gabled buildings that contribute to the character of the existing built edge to the river and make a positive contribution to public placemaking and the cultural identity of this part of the city. The riverside walk will remain open to the public during normal public park hours.

## 10.8 SUSTAINABLE ENVIRONMENTAL INFRASTRUCTURE AND FLOOD RISK

**SI3:** *To require all new development to provide separate foul and surface water drainage systems.*

**SI4:** *To require new private development sewers which are intended to connect to the public drainage system to comply with the requirements of the Greater Dublin Regional Code of Practice for Drainage Works and/ or Irish Water foul sewer specification (where applicable).*

**SI15:** *All development proposals shall carry out, to an appropriate level of detail, a Site-Specific Flood Risk Assessment (SSFRA) ....*

**SI21:** *To minimise flood risk arising from pluvial (surface water) flooding in the City by promoting the use of natural or nature-based flood risk management measures as a priority, by requiring the use of sustainable drainage systems (SuDS) to minimise and limit the extent of hard surfacing and paving, and requiring the use of sustainable drainage techniques, where appropriate, for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risk and to deliver wider environmental and biodiversity benefits, and climate adaption.*

**SI23:** *To require all new developments with roof areas in excess of 100 sq. metres to provide for a green blue roof designed in accordance with the requirements of Dublin City Council’s Green and Blue Roof Guide (2021) which is summarised in Appendix 11.*

Appendix 11 notes that *Planning applications which include roof areas of greater than 100 square metres with flat and gently sloped roofs are considered appropriate for green blue roof application. The extent of roof area which provides growing medium for vegetation must meet the following coverage requirements as a percentage of total roof area.*

**Table 1: Green Blue Roof Minimum Coverage**

Type of green roof	Minimum coverage (% of total roof area being developed)
Extensive	70%
Intensive	50%

**Figure 4:** Extract from Table 1 of Appendix 11 of the Dublin City Development Plan 2022-2028

The proposed modifications do not give rise to any changes to the permitted drainage design or SUDS measures.

We refer the Planning Authority to the enclosed **Letter**, prepared by ARUP Group which confirms that the proposed amendments do not constitute material change or modifications to the technical information provided for the scheme permitted under DCC Reg. Ref. LRD6080/25-S3A.

In respect of Flood Risk Assessment the same conclusion remains applicable, that: -

*There is no record historical flooding at the site.*

*While the site borders the River Liffey, flood risk to the site is low and existing ground levels are above the maximum 1% AEP fluvial water level and the 0.5% AEP tidal level. The risk of groundwater flooding is also low.*

*There is a risk of pluvial flooding at the site. This risk will be managed through grading of paved surfaces to direct surface water to the drainage system, and provision of drainage channels across entrance points to collect surface water. Further mitigation actions will be taken to remove part of the surface runoff from the combined sewer on Parkgate Street and relieve the drainage system in the area, reducing the risk of pluvial flooding in the vicinity of the site.*

*The minimum site flood defence level of the proposed development including an allowance for climate change and freeboard is 4.07mOD.*

*Flood risk to the buildings on site will be managed by setting minimum FFLs to 5.20mOD.*

*Access and egress routes will not be compromised during a flood event with the exception of the route to the internal river walk next to the River Liffey. This is not a primary access and egress route for the proposed development and the entrance/exit point to the building itself will be above the minimum site flood defence level.*

*The proposed development will also not impact on floodplain storage or conveyance.*

*As a small area of the existing site is within the 0.1% AEP tidal flood extent. The site is therefore classified as Flood Zone B and a Justification Test is required. Both the Plan Making and Development Management Justification elements of the Justification test have been assessed and both are deemed to be passed as part of this FRA.*

**SI22:** To require the use of Sustainable Drainage Systems (SuDS) in all new developments, where appropriate, ...

The permitted water drainage system was designed in accordance with the Greater Dublin Regional Code of Practice for Drainage Works Version 6.0, the CIRIA SUDS Manual C753 2015 and Dublin City Development Plan 2016-2022. No changes to the permitted SuDS are proposed as part of the proposed modifications to the consented scheme.

We refer the Planning Authority to the enclosed **Drainage and Watermain Report**, prepared by ARUP Group which confirms same.

**SI29:** To require new commercial and residential developments, to include adequate and easily accessible storage space that supports the separate collection of as many waste and recycling streams as possible, but at a minimum general domestic waste, dry recyclables and food waste as appropriate (for further guidance, see Appendix 7).

**SI30:** To require that the storage and collection of mixed dry recyclables, organic and residual waste materials within proposed apartment schemes have regard to the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2018 (or and any future updated versions of these guidelines produced during the lifetime of this plan).

We refer the Planning Authority to the enclosed **Operational Waste Management Plan**, prepared by AWN Consulting LTD which provides detail on the additional bin stores proposed as part of the proposed modifications to the consented scheme, to address modifications to the mix and an uplift of apartment units.

Additionally, we refer to the enclosed floor plans, prepared by Reddy Architecture + Urbanism which provides details of the location of the proposed bin stores.

**SI42:** To not allow unnecessary, inappropriate or excessive artificial lighting and to ensure that the design of public and external lighting proposals minimises light spillage or pollution and has due regard to the character, environmental sensitivity and residential amenity of the surrounding area.

There are no changes proposed to the permitted public lighting scheme.

## 10.9 GREEN INFRASTRUCTURE

**GI6:** *To integrate Green Infrastructure and an ecosystem services approach into new developments / new growth areas in the city that contributes to the city's green infrastructure network by its extension and enhancement and that provides for the environmental resilience of new development.*

**GI16:** *That new development should provide opportunities to incorporate biodiversity improvements through urban greening and the use of nature based infrastructural solutions that are of particular relevance and benefit in an urban context. Opportunities should be taken as part of new development to provide a net gain in biodiversity.*

**GI17:** *Habitat Restoration To increase the percentage of restored and naturalised areas on public land in the city. That new development on private and public lands should provide opportunities for restoration of degraded habitats and soils where feasible and provide for their long-term maintenance to limit degradation.*

**GI28:** *To ensure that in new residential developments, public open space is provided which is sufficient in amenity, quantity and distribution to meet the requirements of the projected population, including play facilities for children and that it is accessible by safe secure walking and cycling routes.*

**GI52:** *To seek the provision of children's playing facilities in new residential developments and mixed developments with a residential element. To provide playgrounds to an appropriate standard of amenity, safety, and accessibility and to create safe and accessible places for socialising and informal play.*

### **Proposed Development**

There are no changes to the consented scheme in respect of the permitted public open space provision.

The consented scheme with proposed modifications continues to meet the Development Plan and Compact Settlement Guidelines criteria in terms of the quantum and quality of public open space on and off site that will be available for enjoyment by the local resident, working and visiting populations.

The most significant features of the permitted public amenity open space include the 'river walk' and public plaza, connecting to Parkgate Street and the River Liffey.

Publicly accessible open space and amenities will be open during normal public park opening hours only and otherwise access controlled by the management company.

The wider scheme, most recently re-permitted under LRD6074/24-S3 provides a ground level communal courtyard located between Blocks B and C, which includes a Children's Play Space. A large chess board (12sqm) surrounded by seating and tree planting at the southwest of the residential courtyard is also located between Block B and Block C. The Development Plan requirement is not a

pro rata standard. The permitted play area within the consented scheme exceeds the standard threshold for on-site provision.

## 10.10 DEVELOPMENT STANDARDS

### 10.10.1 Plot Ratio and Site Coverage

Table 2 of Appendix 3 sets out the indicative Plot Ratio and Site Coverage for different areas as follows:

-

**Table 2: Indicative Plot Ratio and Site Coverage**

Area	Indicative Plot Ratio	Indicative Site Coverage
Central Area	2.5-3.0	80-90%
Regeneration Area	1.5-3.0	50-60%
Conservation Area	1.5-2.0	45-50%
Outer Employment and Residential Area	1.0-2.5	45-60%

**Figure 5:** Extract from Table 2 of Appendix 3 of the Dublin City Development Plan 2022-2028

### Proposed Development

The site coverage and plot ratio of the consented scheme, with proposed modifications, remain at 42% and 5.1 respectively.

It was previously accepted that these are indicative and not stand alone objectives.

The consented scheme, with the proposed modifications, achieves the realisation of a number of cross cutting policies and objectives relating to the sustainable, high density (re)development of underutilised, brownfield, central sites, to deliver a mix of residential and other uses, within immediate reach of city centre amenities, employment and alternative modes of transport.

### 10.10.2 Density

Table 1 of Appendix 3 sets out density ranges generally supported in the city: -

**Table 1: Density Ranges**

Location	Net Density Range (units per ha)
City Centre and Canal Belt	100-250
SDRA	100-250
SDZ/LAP	As per SDZ Planning Scheme/LAP
Key Urban Village	60-150
Former Z6	100-150
Outer Suburbs	60-120

**Figure 6:** Extract from Table 1 of Appendix 3 of the Dublin City Development Plan 2022-2028

We refer the Planning Authority to in earlier in-depth discussion in respect of how the proposed modifications to the consented scheme meet the density recommendations of the Compact Settlement Guidelines 2024.

The Development Plan, similarly, identifies a general presumption against schemes in excess of 300 units per hectare that can challenge successful placemaking and liveability. Schemes in excess of this

density may only be considered in exceptional circumstances where a compelling architectural and urban design rationale has been presented.

The consented scheme already exceeds the upper density range, at 685 dw/ha, for sustainable reasons, previously outlined. The proposed modifications will result in an uplift of 16no. apartments units within the consented scheme. This results in a marginally increased total of 569no. apartments, on a net site area of c. 0.82ha. The resultant residential density is **694 dw/ha**.

The site is located within designated Strategic Development and Regeneration Area (SDRA7), where potential for high density mid-rise and landmark buildings has been identified in the Development Plan. Higher residential density is the logical outcome of the taller residential buildings already permitted on site.

We would reiterate that the consented development was previously considered by both An Coimisiún Pleanála and Dublin City Council to constitute proper planning and sustainable development at this site. It is of high architectural and urban design quality (including a landmark building) and acceptable residential density (positively increasing housing stock in the city), residential and visual amenity, urban design, height and quantum of development. The proposed modifications do not change these essential attributes of the consented scheme.

The marginal increase in residential density arising from the proposed amendments is achieved largely within the already permitted building envelope. As previously noted the plot ratio and site coverage remain as per the consented development. The uplift in residential unit number also does not materially increase loading on water and drainage services or deplete community, cultural or open space facilities in the surrounding area. The proposed units do not give rise to any new overlooking, overshadowing or dominance of existing or permitted neighbouring residential properties. No new impacts on visual or cultural amenity arise as a result of the proposed modifications.

We would respectfully submit that the original conclusions of the planning authority should not change, in that the scheme as amended would remain of strategic and national importance, supporting strategic planning policy (including National Planning Framework NPO) to deliver compact development through increased density at a brownfield regeneration site identified for intensive high density and suitable for taller buildings, at a regional public transportation gateway to Dublin, in a scheme of high architectural quality and urban design.

Nonetheless, we note that Table 3 of Appendix 3 of the City Development Plan outlines criteria to be used in assessing urban schemes of enhanced density and scale. These criteria are outlined below and followed by the Applicant's response.

***Objective 1- To promote development with a sense of place and character.***

***Enhanced density and scale should:***

- *Respect and/or complement existing and established surrounding urban structure, character and local context, scale and built and natural heritage and have regard to any development constraints,*
- *Have a positive impact on the local community and environment and contribute to 'healthy placemaking',*
- *Create a distinctive design and add to and enhance the quality design of the area,*
- *Be appropriately located in highly accessible places of greater activity and land use intensity,*
- *Have sufficient variety in scale and form and have an appropriate transition in scale to the boundaries of a site/adjacent development in an established area,*
- *Not be monolithic and should have a well-considered design response that avoids long slab blocks,*
- *Ensure that set back floors are appropriately scaled and designed.*

The proposed modifications to the consented scheme have been carefully considered. They give rise to no substantive change to how the permitted buildings positively relate to the street and river edges to the site, and continue to enhance the existing surrounding townscape.

We refer the Planning Authority to the accompanying **Architectural Design Statement** and elevational drawings prepared by Reddy Architecture & Urbanism for further architectural details.

**Objective 2- To provide appropriate legibility.**

Enhanced density and scale should:

- *Make a positive contribution to legibility in an area in a cohesive manner,*
- *Reflect and reinforce the role and function of streets and places and enhance permeability.*

The physical layout of the consented scheme with the proposed modifications will continue to contribute to an attractive, welcoming environment, with new linkages, public and private spaces that are well overlooked by the residential apartments and animated at ground floor level by other uses, in the same manner.

The consented scheme already provides high levels of site permeability through the provision of the public plaza and riverside walkway, with visual connections to other notable parts of the city, and with the potential for future onward links along the river edge.

Permitted Block A is a landmark building that enhances the legibility and navigation of the city, forging a dynamic relationship with other historic and new buildings in the area, and extending the public perception of the city centre as far as the western Heuston gateway.

**Objective 3- To provide appropriate continuity and enclosure of streets and spaces.**

Enhanced density and scale should:

- *Enhance the urban design context for public spaces and key thoroughfares,*
- *Provide appropriate level of enclosure to streets and spaces,*
- *Not produce canyons of excessive scale and overbearing of streets and spaces,*
- *Generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3,*
- *Provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest.*

As previously discussed, the marginally increased density of residential units does not change the scale, massing, character or appearance of the consented scheme, or how it integrates open spaces and amenity links with the surrounding environment.

The Street to Building Ratio remains largely as permitted.

The consented scheme, together with the proposed modifications, provides an appropriate level of enclosure to the streets and spaces.

The consented scheme with proposed modifications maintains the same relationship with the river walk.

There remains a generous restaurant/café unit at the ground level of Block A, with active frontage to Parkgate Street and the public space. This complements the community space and second café/restaurant unit at ground floor in Block B, all contributing towards the activation of the public realm and Parkgate Street.

**Objective 4- To provide well connected, high quality and active public and communal spaces**

Enhanced density and scale should:

- *Integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport,*
- *Be appropriately scaled and distanced to provide appropriate enclosure/exposure to public and communal spaces, particularly to residential courtyards,*
- *Ensure adequate sunlight and daylight penetration to public spaces and communal areas is received throughout the year to ensure that they are useable and can support outdoor recreation, amenity and other activities – see Appendix 16,*
- *Ensure the use of the perimeter block is not compromised and that it utilised as an important typology that can include courtyards for residential development,*
- *Ensure that potential negative microclimatic effects (particularly wind impacts) are avoided and or mitigated,*
- *Provide for people friendly streets and spaces and prioritise street accessibility for persons with a disability.*

We refer the Planning Authority to the enclosed **Sunlight & Daylight Assessment**, prepared by IN2. No significant adverse sunlight or daylight impacts arising from the proposed modifications to the consented scheme, for proposed, permitted or existing neighbouring development, is predicted.

The consented scheme with the proposed modifications continues to prioritise pedestrian and cycle accessibility, in the same manner.

The consented scheme with proposed modifications is Part M compliant. It makes appropriate provision for prospective residential, working and visiting population, of all abilities, to access its residential, commercial and community/cultural accommodation and open space amenities.

**Objective 5- To provide high quality, attractive and useable private spaces.**Enhanced density and scale should:

- *Not compromise the provision of high quality private outdoor space,*
- *Ensure that private space is usable, safe, accessible and inviting,*
- *Ensure windows of residential units receive reasonable levels of natural light, particularly to the windows of residential units within courtyards – see Appendix 16,*
- *Assess the microclimatic effects to mitigate and avoid negative impacts,*
- *Retain reasonable levels of overlooking and privacy in residential and mixed use development.*

Private balconies/ terraces are provided to each of the proposed new apartments, as external amenity areas that achieve (or in some cases exceed) the standards required by the Apartment Design Guidelines (2023 and 2025). All private open spaces can be accessed directly from the main living areas.

Separation distances between the permitted buildings and opposing living area windows exceed the minimum requirements set out in the Compact Settlement Guidelines, ensuring privacy for future residents.

We refer to the **Architects Design Statement** and **Housing Quality Assessment** for further details.

We refer the Planning Authority to the enclosed **Sunlight & Daylight Assessment**, prepared by IN2.

**Objective 6- To promote mix of use and diversity of activities.**Enhanced density and scale should:

- *Promote the delivery of mixed use development including housing, commercial and employment development as well as social and community infrastructure,*
- *Contribute positively to the formation of a 'sustainable urban neighbourhood',*
- *Include a mix of building and dwelling typologies in the neighbourhood,*
- *Provide for residential development, with a range of housing typologies suited to different stages of the life cycle.*

As previously discussed under the Z5 land use zoning objective and SDRA 7 principles for this site, the consented development with proposed modifications, would remain a mixed-use scheme in the same manner. A mix of residential, retail, café/restaurant, recreational and community/cultural amenities will breathe new life into a highly accessible and well serviced, brownfield site. All uses of which are permissible under the Z5 zoning objective.

The proposed development is consistent with strategic planning policy and guidelines, in the promotion of more compact mixed use urban regeneration that delivers:

- increased residential density,
- of high-quality urban design and architecture,
- at an underutilised, brownfield site on the edge of the city centre,
- served by high frequency public transport connecting it with Dublin City Centre and other strategic settlements and employment zones within the Dublin Metropolitan Area.

The application site is strategically located within the built-up footprint of Dublin's Metropolitan Area, within the western edge of the city centre. The consented scheme with proposed modifications will continue to deliver a high quality residential-led mixed-use development at Parkgate Street, on land zoned for a mix of uses (including residential) appropriate to maintaining the life and vitality of the city centre. The site benefits from excellent access to numerous forms of public transport, cycle and pedestrian facilities in the area. It is therefore considered that the consented development, together with the proposed amendments contribute positively to the formation of a sustainable urban neighbourhood.

The consented scheme with proposed modifications will continue to be representative of sustainable compact urban development, ensuring the delivery an appropriate apartment mix, supported by ancillary facilities, at this prominent, underutilised brownfield site at the western gateway to the city. We refer the Planning Authority to the enclosed **Housing Quality Assessment**, prepared by Reddy Architecture + Urbanism.

***Objective 7- To ensure high quality and environmentally sustainable buildings.***

*Enhanced density and scale should:*

- *Be carefully modulated and orientated so as to maximise access to natural daylight, ventilation, privacy, noise and views to minimise overshadowing and loss of light – see Appendix 16,*
- *Not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain,*
- *Ensure a degree of physical building adaptability as well as internal flexibility in design and layout,*
- *Ensure that the scale of plant at roof level is minimised and have suitable finish or screening so that it is discreet and unobtrusive,*
- *Maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross ventilation and for reasons of good street frontage,*
- *Be constructed of the highest quality materials and robust construction methodologies,*

- *Incorporate appropriate sustainable technologies, be energy efficient and climate resilient,*
- *Apply appropriate quantitative approaches to assessing daylighting and sun lighting proposals. In exceptional circumstances compensatory design solutions may be allowed for where the meeting of sun lighting and daylighting requirements is not possible in the context of a particular site (See Appendix 16),*
- *Incorporate an Integrated Surface Water Management Strategy to ensure necessary public surface water infrastructure and nature based SUDS solutions are in place – see Appendix 13,*
- *Include a flood risk assessment – see SFRA Volume 7.*
- *Include an assessment of embodied energy impacts – see Section 15.7.1.*

The arrangement of the buildings and the building heights themselves of the consented scheme are not changed by the proposed modifications.

The permitted buildings are arranged to respond to and generate variety in built form and visual interest in the surrounding context, topography and scale of surrounding developments. The consented scheme, with proposed modifications, will continue to make a positive contribution to the urban neighbourhood and streetscape, in the same manner.

The consented and proposed apartments have been designed to maximise dual aspect, sunlight and daylight accessibility, privacy and ventilation.

Similarly, the architectural design and internal layouts of the consented, modified and additional apartments ensure appropriate separation distances are maintained to maximise privacy to living spaces.

47% of the proposed units are dual aspect, significantly higher than the requirements of the Apartment Guidelines (2025).

Sunlight and daylight analysis, and shadow study, by IN2, enclosed with the application, informed the design development to ensure appropriate environmental performance of the proposed and permitted units, and to ensure no new adverse shadowing of neighbouring residential properties arises.

The consented and proposed apartments are designed to be adaptable, with future proofing in place to allow for potential internal modifications, subdivisions and amalgamations, should this be required in the future to meet the needs of a greater number of smaller or larger households over time.

The façades of the consented development are not changed by the proposed modifications. The permitted buildings are articulated to create a lively/moving façade. The choice of contextual materials includes natural stone cladding, glazed screens, brick and render to provide a modern interpretation with traditional materials. At the lower levels, quality, durable finishes are incorporated in deference to the street realm to ensure a quality treatment. The architectural language is contemporary throughout the consented scheme but picks up on the grain of the area. The proposed modifications do not alter this.

The consented scheme, with proposed modifications, is designed to accommodate future requirements of NZEB. Technical analysis of the various thermal and solar models creates a façade that will provide thermal comfort yet achieve the required daylighting for its intended use. The target BER of the building is to be A rated. The materials are chosen to be durable, long lasting, and well detailed to cope with the Irish climate. The proposed modifications do not alter this.

We refer the Planning Authority to the enclosed **Letter**, prepared by ARUP Group which confirms that the proposed amendments do not constitute material change or modifications to the technical information provided for the scheme permitted under DCC Reg. Ref. LRD6080/25-S3A, including the conclusion of the Flood Risk Assessment which remains applicable: -

*There is no record historical flooding at the site.*

*While the site borders the River Liffey, flood risk to the site is low and existing ground levels are above the maximum 1% AEP fluvial water level and the 0.5% AEP tidal level. The risk of groundwater flooding is also low.*

*There is a risk of pluvial flooding at the site. This risk will be managed through grading of paved surfaces to direct surface water to the drainage system, and provision of drainage channels across entrance points to collect surface water. Further mitigation actions will be taken to remove part of the surface runoff from the combined sewer on Parkgate Street and relieve the drainage system in the area, reducing the risk of pluvial flooding in the vicinity of the site.*

*The minimum site flood defence level of the proposed development including an allowance for climate change and freeboard is 4.07mOD.*

*Flood risk to the buildings on site will be managed by setting minimum FFLs to 5.20mOD.*

*Access and egress routes will not be compromised during a flood event with the exception of the route to the internal river walk next to the River Liffey. This is not a primary access and egress route for the proposed development and the entrance/exit point to the building itself will be above the minimum site flood defence level.*

*The proposed development will also not impact on floodplain storage or conveyance.*

*As a small area of the existing site is within the 0.1% AEP tidal flood extent. The site is therefore classified as Flood Zone B and a Justification Test is required. Both the Plan Making and Development Management Justification elements of the Justification test have been assessed and both are deemed to be passed as part of this FRA.*

**Objective 8- To secure sustainable density, intensity at locations of high accessibility.**

Enhanced density and scale should:

- *Be at locations of higher accessibility well served by public transport with high capacity frequent service with good links to other modes of public transport,*
- *Look to optimise their development footprint; accommodating access, servicing and parking in the most efficient ways possible integrated into the design.*

The application site is well served by public transport. Heuston Station is approximately 200m from the site which provides national and regional rail services, as well as LUAS services. On Parkgate Street a number of Dublin Bus routes are located which give further access across the city. There is a Dublin Bikes Station directly adjacent the site near Heuston Bridge, as well as many dedicated cycle lanes in the nearby roads that provide safe cycling for cyclists.

Bicycle parking is proposed to be increased to address the proposed modifications and uplift to the permitted apartments.

Per the consented scheme, bicycle parking for residents is located at basement level with direct access from the each Block's lobby. Visitor bicycle parking is located within the external common areas with access directly from Parkgate Street and the consented River Walk.

The consented scheme, with proposed amendments, continues to prioritise pedestrian and cyclist movement.

**Objective 9- To protect historic environments from insensitive development**

Enhanced density and scale should:

- *Not have an adverse impact on the character and setting of existing historic environments including Architectural Conservation Areas, Protected Structures and their curtilage and National Monuments – see section 6 below.*
- *Be accompanied by a detailed assessment to establish the sensitivities of the existing environment and its capacity to absorb the extent of development proposed,*
- *Assess potential impacts on key views and vistas related to the historic environment.*

We refer the Planning Authority to the enclosed **Addendum Architectural Heritage Impact Assessment**, prepared by ARC which confirms that the *“the proposed modifications to the permitted development do not involve any works to structures of architectural heritage value, whether they are protected structures or not. Nor are the proposed modifications to the development likely to result in any material or perceived effects on the setting of structures of architectural heritage value over and above effects occasioned by the permitted development. Therefore, the proposed modifications will not give rise to any direct impact on the architectural heritage of any structures on the subject site or on their setting”*.

We refer the Planning Authority also to the enclosed **Addendum Landscape and Visual Impact Assessment**, prepared by ARC. It is ARC’s assessment that the proposed amendments will not result in any change to the previously assessed extent of potential landscape and visual effects.

**Objective 10- To ensure appropriate management and maintenance.**

Enhanced density and scale should:

- *Include an appropriate management plan to address matters of security, management of public/communal areas, waste management, servicing etc.*

The **Management Plan**, prepared by Aramark, submitted under LRD6074/24-S3 does not change on foot of the proposed modifications.

### 10.10.3 Building Height

It is a general principle of the Development Plan to support increased height and higher density schemes in the **city centre, Strategic Development Regeneration Areas**, Key Urban Villages, areas close to high frequency public transport and some other areas (as identified) considered as suitable for increased intensity of development.

The consented scheme is located within Dublin City Centre, at the western gateway to the city centre, within SDRA7 identified as a suitable location for mid-rise and tall buildings.

The application site is accessible to a range of city centre amenities and to significant employment opportunities in the city centre, at nearby hospital and third level education campuses and at the docklands. The site presents a logical western counterpoint to high density residential and mixed use development located at Dublin Docklands.

The consented scheme has already established the permission for high density, mid-rise and tall landmark building height at this site. The permitted building height, scale and massing is not materially changed by the proposed modifications to the consented scheme hereby sought.

The consented scheme, with the proposed modifications, therefore remains consistent with the Building Height Guidelines (2018). We refer to Section 10.10.2 above which demonstrates how the proposed development complies with Table 3 of Appendix 3 of the Dublin City Development Plan (Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale). The permitted building heights are also in accordance with the SDRA 7 design principles, per the consented scheme.

We refer the Planning Authority to the enclosed **Architectural Design Statement**, prepared by Reddy Architecture & Urbanism for detail.

### 10.10.4 Car Parking Standards

Under the Dublin City Development Plan, Table 2 of Appendix 5 sets out maximum car parking standards for various land uses as follows: -

Table 2: Maximum Car Parking Standards for Various Land Uses

Category	Land-Use	Zone 1	Zone 2	Zone 3
Accommodation	Hotel <sup>1</sup>	None	1 per 3 rooms	1 per room
	Nursing Home	1 per 3 residents	1 per 2 residents	1 per 2 residents
	Elderly Persons Housing	1 per 4 dwellings	1 per 2 dwellings	1 per 2 dwellings
	Sheltered Housing	1 per 4 dwellings	1 per 2 dwellings	1 per 2 dwellings
	Student Accommodation	None <sup>2</sup>	1 per 20 bed spaces	1 per 10 bed spaces
	Houses, Apartments/ Duplexes	1 per dwelling	1 per dwelling	1 per dwelling
Civic, Community and Religious	Bar <sup>3</sup>	1 per 350 sq. m. GFA	1 per 275 sq. m. GFA	1 per 75 sq. m. GFA
	Community Centre	1 per 350 sq. m. GFA	1 per 275 sq. m. GFA	1 per 75 sq. m. GFA
	Library	1 per 350 sq. m. GFA	1 per 275 sq. m. GFA	1 per 75 sq. m. GFA
	Public Institution	1 per 350 sq. m. GFA	1 per 275 sq. m. GFA	1 per 75 sq. m. GFA
	Place of Worship	1 per 100 seats	1 per 25 seats	1 per 10 seats
Education	Funeral Home	4 off street parking spaces	4 off street parking spaces	4 off street parking spaces
	College of Higher Education	None	1 per classroom plus 1 per 30 students	1 per classroom plus 1 per 30 students
	Crèche/ Childcare Services <sup>5</sup>	1 per 100sq.m. GFA	1 per 100 sq. m. GFA	1 per 100 sq. m. GFA
Medical	School <sup>4</sup>	None	1 per classroom	1 per classroom
	Clinics and Group Practices	1 per consulting room	2 per consulting room	2 per consulting room
	Hospital	1 per 150 sq. m. GFA	1 per 100 sq. m. GFA	1 per 60 sq. m. GFA

Category	Land-Use	Zone 1	Zone 2	Zone 3
Retail and Retail Service	Café Restaurant and Takeaways	None	1 per 150sq. m. seating area	1 per 150sq. m. seating area
	Public Houses	None	1 per 300 sq. m. NFA	1 per 50 sq. m. NFA
	Club <sup>5</sup>	None	1 per 10 sq. m. floor area	1 per 3 sq. m. floor area
	Retail Supermarkets exceeding 1,000sq.m. GFA	None	1 per 100 sq. m. GFA*	1 per 30 sq. m. GFA*
	Other Retail and Main Street	1 per 350 sq. m. GFA	1 per 275 sq. m. GFA	1 per 75 sq. m. GFA
	Retail Warehousing (non-food)	1 per 300 sq. m. GFA	1 per 200 sq. m. GFA	1 per 35 sq. m. GFA
Enterprise and Employment	Offices <sup>6</sup>	None <sup>7</sup>	1 per 200 sq. m. GFA	1 per 100 sq. m. GFA
	Manufacturing / Warehousing	1 per 450 sq. m. GFA	1 per 450 sq. m. GFA	1 per 200 sq. m. GFA
Sports and Recreation	Clubhouse	Dependent on nature and location of use		
	Gymnasium <sup>8</sup> Courts Pitches	Dependent on nature and location of use		
Venue	Auditoriums	Dependent on nature and location of use		
	Cinema	Dependent on nature and location of use		
	Conference Centre Stadia <sup>9</sup> Theatre	1 per 100 seats	1 per 25 seats	1 per 10 seats

Figure 7: Extract from Table 2 of Appendix 5 of the Dublin City Development Plan 2022-2028

Under the City Development Plan the site is located within the Zone 1 car-parking zone. The maximum car parking provision 1 no. parking spaces to be provided per residential unit.

22no. stacked car sharing spaces and 2no. non-stacked spaces are permitted at grade.

No additional car parking spaces are proposed. It is noted that the Dublin City Development Plan imposes maximum car parking standards for residential use, and that car parking may not be required at all where the site is immediately accessible to high capacity, high frequency public transport. Heuston Luas station is within 500m of this city centre site.

**10.10.5 Bicycle Parking Standards**

Table 1 of Appendix 5 of the Plan provides bicycle parking standards for various plan uses as follows:

Table 1: Bicycle Parking Standards for Various Land Uses

Category	Land-Use	Zone	Long Term	Short Stay/ Visitor
Accommodation	Hotel <sup>1</sup>	All Zones	1 per 5 staff	To be determined by the Planning Authority on case by case basis
	Nursing Home	All Zones	1 per 5 staff	1 per 10 residents
	Elderly Persons Accommodation/ Sheltered Housing <sup>2</sup>	All Zones	1 per 5 residents	1 per 10 residents
	Residential Apartment <sup>3</sup>	All Zones	1 per bedroom	1 per two apartments
	Residential Dwelling	All Zones	1 per unit	1 per 5 dwellings
	Student Accommodation	All Zones	1 per bedroom	1 per 5 bedrooms
Civic, Community and Religious	Bank	All Zones	1 per 100 sq. m.	1 per 100 sq. m. Gross Floor Area (GFA)
	Community Centre Library	All Zones	1 per 5 staff	1 per 5 staff
	Public Institution	All Zones	-	1 per 20 seats
	Place of Worship	All Zones	-	1 per 20 seats
Funeral homes	All Zones	-	-	To be determined by the Planning Authority on case by case basis
Education	College of Higher Education	All Zones	1 per 5 staff	1 per 2 students
	Crèche/Childcare Services <sup>4</sup>	All Zones	1 per 5 staff	1 per 10 children
	Primary Schools	All Zones	1 per 5 staff	1 per 5 students
	Post Primary Schools	All Zones	1 per 5 staff	1 per 5 students
Medical	Clinics and Group Practices	All Zones	1 per 5 staff	To be determined by the Planning Authority on case by case basis
	Hospital	All Zones	1 per 5 staff	1 per 10 beds
Retail and Retail Service	Café Restaurant	All Zones	1 per 5 staff	1 per 10 seats
	Public Houses	All Zones	1 per 5 staff	1 per 150 sq. m. GFA
	Retail	All Zones	1 per 5 staff	1 per 100 sq. m. GFA
	Retail Warehousing	All Zones	1 per 5 staff	1 per 100 sq. m. GFA
Enterprise and Employment	Offices <sup>5</sup>	All Zones	1 per 75 sq. m. GFA	To be determined by the Planning Authority on case by case basis
	Manufacturing/ Warehousing	All Zones	1 per 200 sq. m.	-
	Clubhouse	All Zones	1 per 5 staff	1 per 50 sq. m. GFA
	Gymnasium <sup>6</sup>	All Zones	1 per 5 staff	1 per 50 sq. m. GFA
Venue	Courts	All Zones	1 per 5 staff	4 per pitch or court
	Auditoriums Cinema Conference Centre Theatre Stadia	All Zones	1 per 5 staff	1 per 20 seats

Figure 8: Extract from Table 1 of Appendix 5 of the Dublin City Development Plan 2022-2028

Bicycle parking for the modified unit mix and additional apartments (Rev 1 & Rev 2 combined) are proposed under the concurrent application for Revision 1 in accordance with Table 1 of Appendix 5 of the Plan and the Compact Settlement Guidelines 2025.

10.10.6 Communal Amenity Space

Regarding communal amenity space, it is noted that Section 15.9.8 of the Development Plan requires that: -

*All new apartment developments are required to provide for communal amenity space externally within a scheme for the use by residents only. Communal open space provision is in addition to any private or public open space requirements. Communal amenity spaces may comprise of courtyard spaces and linear open spaces adjacent to the development.*

apartments total, of which 145no. remain ‘BTR’) requires a total of c. 2,942sqm of communal open space to meet relevant requirements of the Apartment Guidelines 2025: -

Unit Type	Studio*	1-bed	2-bed (3-Pers)	2-bed (4-Pers)	3-bed (4-Pers)**	Build to sell units (Block A)***	Build-to-Rent units (Block A)****
No. Units	13no.	179no.	32no.	126no.	21no.	53no.	145no.
Required Communal Open Space	100sqm	895sqm	192sqm	882sqm	231sqm	642sqm	N/A
<b>Total</b>							<b>2,942sqm</b>

\* 6no. studios have no private amenity, 8sqm of external communal space is allocated to these units  
 \*\* An allowance of an additional 2sqm per unit is allocated to 3-bed apartments with 7sqm of private open space  
 \*\*\* Build to Sell units in Block A provided additional communal open space where private open space is not provided

\*\*\*\* Build to Rent apartments, permitted under 2020 Apartment Guidelines have access to c. 827sqm of external and internal amenity

**Table 13:** Permitted and Proposed Communal Open Space Requirement (all units). Flexibility allowed for unchanged Block A 'BTR' unit types permitted under the Apartment Guidelines 2020 in force at the time.

The consented development, as modified, delivers c. **3,204sqm of external communal amenity space** and c. 565sqm of internal communal amenity space. Breakdown provided below.

Provided	Block A	Block B1	Block B2	Block C	Total
External	343sqm	1,725sqm	371sqm	7645sqm	3,204sqm
Internal	398qm	115sqm	52sqm	-	565sqm
<b>Total</b>					<b>3,769sqm</b>

**Table 14:** Permitted and Proposed Communal Open Space Provision

2,942sqm of external communal amenity space is provided for the 424no. build to sell apartments. The 145no. build to rent apartments benefit from 262sqm of external communal amenity space and 565sqm of internal amenity.

We refer the Planning Authority to Section 5.8 of the **Architectural Design Statement**, prepared by Reddy Architecture and Urbanism, for further details.

#### 10.10.7 Play Infrastructure

Section 15.8.8 of the City Development Plan requires: -

*In schemes of 25 or more units, small play spaces of 85-100 sq. m. are considered suitable for toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building. For larger schemes of 100 or more apartments, play areas of 200-400 sq. m for older children and young teenagers should also be provided in addition.*

The wider consented scheme (LRD6074/24-S3) provides for a ground level communal courtyard located between Blocks B and C includes a Children's Play Space of 100sqm and a large chess board (12sqm) surrounded by seating and tree planting.

The Development Plan requirement is not a pro rata standard. The consented scheme exceeded the threshold for provision and the proposed development, as amended, is captured within the permitted play space provision.

It is highlighted that the river walk, public and communal amenity spaces are included within the consented scheme, as amended, suitable for use by this cohort. Thereafter, the site lies immediately

adjacent to a number of existing adjacent sports, social and recreation facilities such as: -

- |  |   |
|--|---|
| - Phoenix Park                                       | - St. Catherine's Sports Centre                         |
| - The Croppies Acre Park                             | - Marshall Art Incorporated Dublin 7                    |
| - Avona Boxing Club                                  | - Phonix Park Playground                                |
| - TU Grangegorman Playing Fields                     | - Grangegorman Playground                               |
| - Arbour Hill Boxing Club                            | - Lighthouse Cinema                                     |
| - The Royal Gardens at the Royal Hospital Kilmainham | - National Museum of Ireland- Decorative Arts & History |
| - Irish Museum of Modern Art                         | - Dublin Zoo  |
| - Collins Barracks                                   | - Jervis Shopping Centre                                |
| - Montpelier Play Space                              | - National War Memorial Gardens                         |
| - St. Brendan's GAA Club                             | - Cineworld   |
| - Bridgefoot Street Park                             |   |

### 10.10.8 Culture

**Objective CU025** is a new objective in the Development Plan, which states: -

*All new regeneration areas (SDRAs) and large-scale developments above 10,000 sq. m. in total area\* must provide at a minimum for 5% community, arts and culture spaces including exhibition, performance, and artist workspaces predominantly internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need. \*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.*

Of note in respect of compliance with Objective CU025: -

- Development threshold for compliance is 10,000 sq m.
- 5% to be met predominantly by internal floor space.
- The possibility of external cultural / community space is not precluded.
- The possibility of off-site cultural / community space may be considered (no more than half of the 5% requirement).
- The balance of space between cultural and community use can be justified on evidence based audit of the immediate area.

The following definitions of community and cultural uses are provided in the Development Plan:

#### **Community Facility**

*A building, or part thereof, used for (community) activities organised primarily by the local community and to which the public may be admitted on payment of a charge or free of charge and includes community meeting space, parish centres, social/ non-sporting clubs such as youth clubs, bridge clubs and scouts' dens, clubhouses and family resource centres.*

#### **Cultural / Recreational Building and Uses**

*A building, or part thereof, used for cultural/ recreational purposes to which the public may be admitted on payment of a charge or free of charge such as:*

- ♣ *A concert hall/ music hall/ music recital*
- ♣ *A theatre*
- ♣ *A cinema*
- ♣ *An art gallery (but not for the sale or hire of works of art)*

- ♣ *A museum*
- ♣ *A public library or public reading room*
- ♣ *A public hall*
- ♣ *An exhibition hall*
- ♣ *A social centre, community centre, or non-residential club, but not a dance hall.*
- ♣ *Display or exhibition of items of interest*
- ♣ *Bingo hall, skating rink etc.*

The consented development, with proposed modifications, will continue to deliver a mix of residential, food & beverage, co-working, community and cultural uses in accordance with its mixed use Z5 zoning, in a similar manner.

In addition to providing a high quality residential scheme at upper levels, the ground level units and areas remain primarily given over to active uses including café/restaurant, community and residential amenity spaces, public and private amenities and open space, which animate Parkgate Street and the surrounding public realm.

This on site provision is then set within the context of an immediately surrounding area that enjoys a wealth of historic, cultural and recreational attractions. Significant historic features and cultural attractions within the immediate vicinity of the site include the City Quays, Heuston Station, Dr Steeven's Hospital, the Royal Hospital Kilmainham, the Guinness Brewery, Collins Barracks, and other protected structures along Parkgate Street. Significant publicly accessible recreational amenities are provided by the expansive Phoenix Park (including Dublin Zoo, Farmleigh, Aras on Uactarain, the Visitor Centre, landscaped gardens and playground facilities), the National Museum of Ireland at Collins Barracks, the Irish Museum of Modern Art at Kilmainham and the Guinness Storehouse, to name a few.

## 11 ENVIRONMENTAL IMPACT ASSESSMENT

We refer the Planning Authority to Appendix A of this Report which addresses Environmental Impact Assessment.

## 12 CHILDCARE

### 12.1 PLANNING POLICY AND GUIDELINES

#### 12.1.1 Childcare Facilities: Guidelines for Planning Authorities (2001)

These Guidelines set out general standards and guidance for the land use planning of childcare facilities in Ireland. It advocates a more proactive role by the planning authority in the promotion and management of childcare provision in their area.

Section 2.4 of the Guidelines sets out the appropriate locations for childcare facilities, stating that:

*“Planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary or where there are adequate childcare facilities in adjoining developments.”*

The Childcare Guidelines recommend the provision of 1no. childcare facility, or 20no. childcare spaces, for every 75no. dwellings in a permitted residential scheme.

There is, however, flexibility under the Guidelines that childcare facilities are not required in every instance of new residential development, having regard to local circumstances.

The Childcare Guidelines acknowledge the factors associated with determining the appropriate level of childcare facilities required in an area, namely:

- The current provision of childcare in the area.

- The nature of emerging new communities.
- Current demographic trends.

The Guidelines specifically state that:

*“The threshold for provision should be established having had regard to the existing geographical distribution of childcare facilities and the emerging demographic profile of areas”.*

### 12.1.2 Sustainable Urban Housing: Design Standards for New Apartments (2023)

The Apartment Guidelines (2023) introduce some further clarification and flexibility to the blanket requirement of the Childcare Guidelines 2001 to provide 1no. childcare facility (20no. spaces) for every 75no. new dwellings.

**The Apartment Guidelines state that the threshold for provision of childcare 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.”*

## 12.2 CHILDCARE NEEDS ASSESSMENT

It may be noted that detailed Childcare Needs Assessments were submitted for the consented scheme under ABP-310567-21 (dated June 2021) and DCC Reg. Ref. LRD6042/23-S3A (dated October 2023). The most recent Childcare Needs Assessment was submitted under DCC Reg. Ref. LRD6074/24-S3 (dated December 2024). These Assessments demonstrated that a childcare facility was not required on site.

The consented scheme with proposed modifications will result in an uplift of 16no. apartments. All permitted and proposed apartments are 1 or 2-bed units.

It is respectfully submitted that the proposed additional and modified apartment units will not give rise to additional new demand for childcare spaces. They comprise studio, 1-bed and 2-bed typologies. They are located within the City, where a range of existing providers already exist. They are otherwise immediately proximate to Dublin City’s inner city transport hub.

This proposal is in accordance with the guidance provided within Section 4.7 of the Sustainable Urban Housing: Design Standards for New Apartments (2023).

A summary of the existing childcare facilities and demographic trends are provided below: -

#### Existing Childcare Provision

- It is conservatively estimated that there are 31no. Tusla registered existing childcare facilities spaces within c. 1.5km of the subject site.
- Furthermore, there is 11no. additional childcare facilities within 1.5km of the subject site which not registered with Tusla however are identified on the Pobal website.
- Additional childcare facilities are also available within the wider Dublin 7 / 8 area, noting that many parents opt to avail of childcare on route or close to their place of work.

#### Demographic Trends

- Population growth rates in Dublin City decreased in the period between 2011, 2016 and 2022. Population growth levels in Phoenix Park ED also decreased.
- The Phoenix Park ED experienced a decrease in population during the 2016 – 2022 period, in contrast to wider Dublin City which experienced population growth for the same period.

- The population levels within the 0 - 4 age group cohort within the Phoenix Park ED remained steady over the Census period (2011 – 2016) and experienced a moderate decrease for the 2022 Census.
- A comparative examination of the SAPS within the study area, indicate that the percentage population within the 0 - 4 age group cohort has also decreased.

Therefore, at a micro-ED and SAPS level, the rate of population growth is decreasing over time and the rate of growth is slower than Dublin City as a whole. Furthermore, the percentage population within the 0 - 4 age group cohort has moderately decreased over a 6-year period and generally in line with the same age cohort within the Phoenix Park ED.

## 13 SOCIAL INFRASTRUCTURE

This Section provides an overview of primary and secondary schools, childcare facilities, healthcare services, sports facilities, arts, and cultural amenities, as well as places of worship and other social resources in the locale.

### 13.1 EDUCATION AND TRAINING

#### Within 500m

No primary or secondary schools are located within 500m of the subject site.

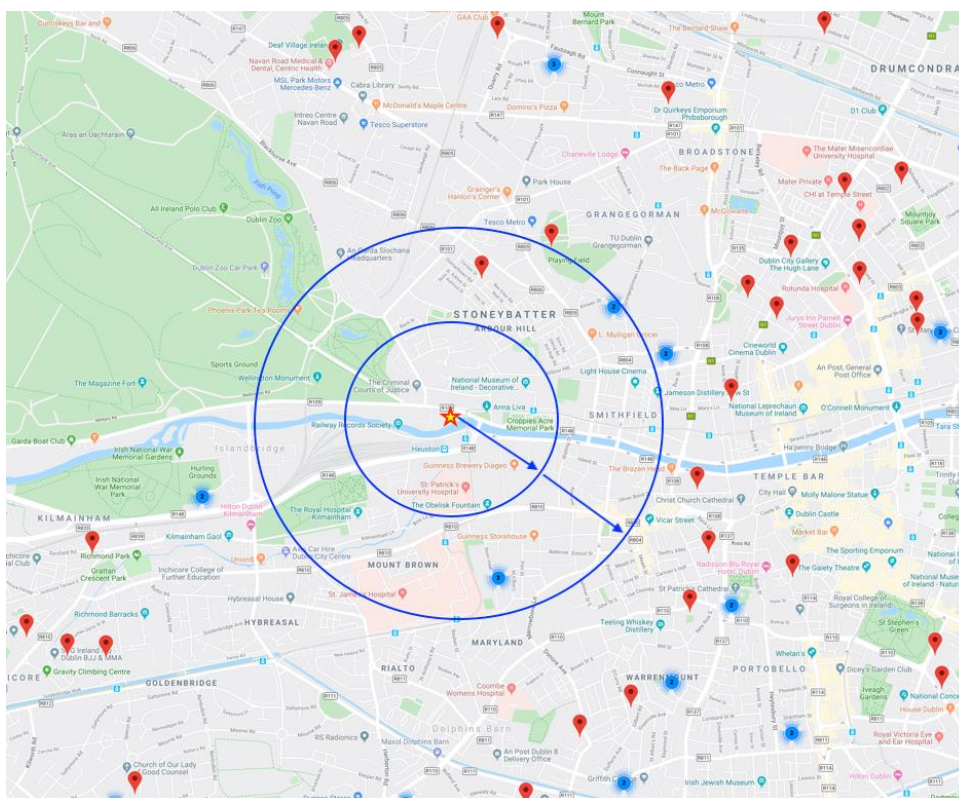
#### Within 1000m

- St. James's Primary School,
- Canal Way Educate Together School
- Stanhope Street Convent Primary School
- St. Gabriel's National School

In addition to this, there are two Secondary Schools within 1 kilometre. These are:-

- CBS James's Street
- St. Josephs Secondary School

There are 38no. primary schools and 10no. post-primary schools in the surrounding Dublin 8 and Dublin 7 area. Of these, 4 no. primary schools and 2no. post primary schools are within 1000m of the subject site.



**Figure 9:** Primary and Post-Primary Schools. Extract from Department of Education and Skills, School Search Results Map. Approximate location of subject site (yellow star), with approximate 500m and 1000m radii marked in blue.

It may be noted that the most recent **Social Infrastructure Audit**, prepared by Stephen Little and Associated submitted under LRD6074/24-S3, with which the planning authority concurred, determined that that the existing provision of schools in the area is sufficient to cater for the demand arising from the now consented development.

The proposed modifications to the consented scheme, give rise to modification of apartment unit mix (they remain studio, 1-bed and 2-bed) and an uplift of only 7no. units. On the basis that the average household size is 2.5 persons, the projected additional population is 40 persons.

The Forward Planning Unit of the DES has previously confirmed that the following percentages of the estimated population is utilised to determine the likely population of school going age: -

- Primary School: 12%.
- Post-Primary: 8.5%.

Using the DES figures above, is estimated that the 7no. additional units proposed could potentially produce a demand for c. 2no. spaces for primary schools and c. 1no. space for post primary schools.

The most recent Department of Education and Skills enrolment data on primary schools indicates that there has been a general decrease in enrolment figures for primary schools in the study area over the past number of years. This is reflected in a recently published Statistical Bulletin Preliminary results for the 2025/26 school year (February 2026) which notes that there has been a national decrease in primary school enrolments between September 2024 and 2025.

Given the likely timeframe for construction and occupation of the consented and proposed modifications in its entirety, the DES would have an opportunity to consider local demand for school places and any requirement to expand existing or provide new facilities in this area in the next tranche of its Capital Investment for Schools Infrastructure, should the need arise.

In our opinion, the proposed amendments will not result in significantly greater demand for school places, that has not already been considered by the planning authority for the scheme already consented, and which DES will be aware of in terms of its development programme.

### 13.2 HEALTH

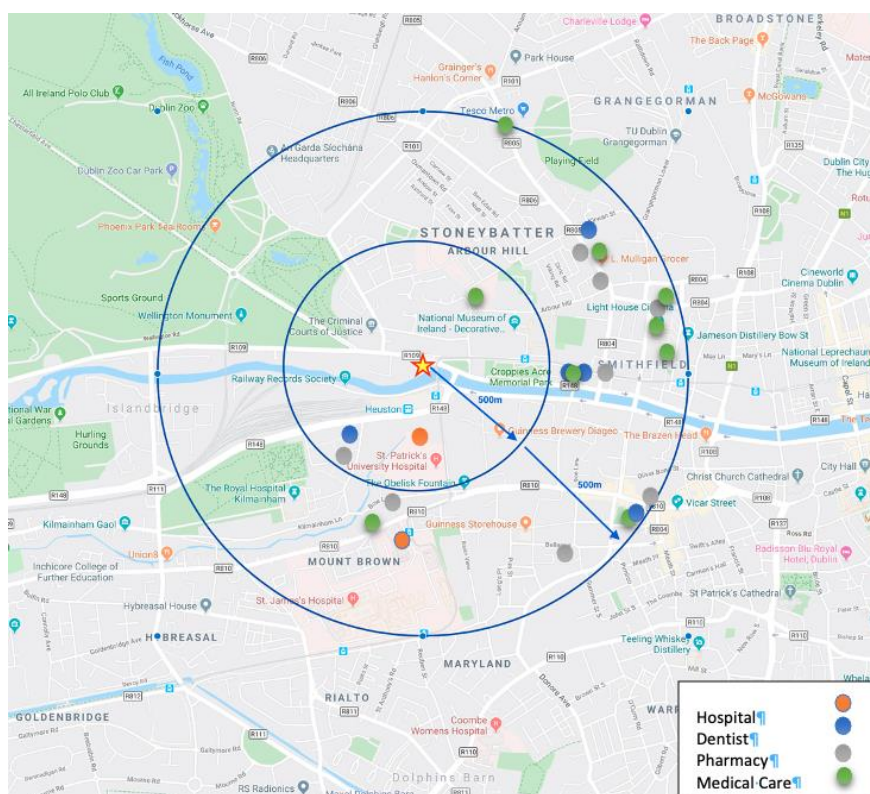
The following private and HSE nursing homes are identified in the Dublin 7 and Dublin 8 area:

Private Nursing Homes	HSE Nursing Homes
Curam Care Home, Navan Road, Cabra, Dublin 7	Cuan Ros Unit for the Elderly, Navan Road, Dublin 7
Santa Sabina House, Cabra, Dublin 7	The Meath Community Unit, 1-9 Heytesbury Street, Dublin 8
Croft Nursing Home, 2 Goldenbridge Walk, Inchicore, Dublin 8	Hollybrook Lodge (St. James' Hospital), Dublin 8
Nephin Nursing Home, 132-134 Navan Road, Cabra, Dublin 7	Bellvilla Community Unit, 129 South Circular Road, D08 TP2D

**Table 15:** Private and HSE Nursing Homes in the Dublin 7 and Dublin 8 Area (source: [www.hse.ie](http://www.hse.ie))

The following healthcare facilities are identified within the 500m catchment:

- Heuston South Quarter Pharmacy
- Dublin Dental Specialist Clinic
- St. Patrick's University Hospital



**Figure 10:** Map showing location of healthcare and medical facilities.

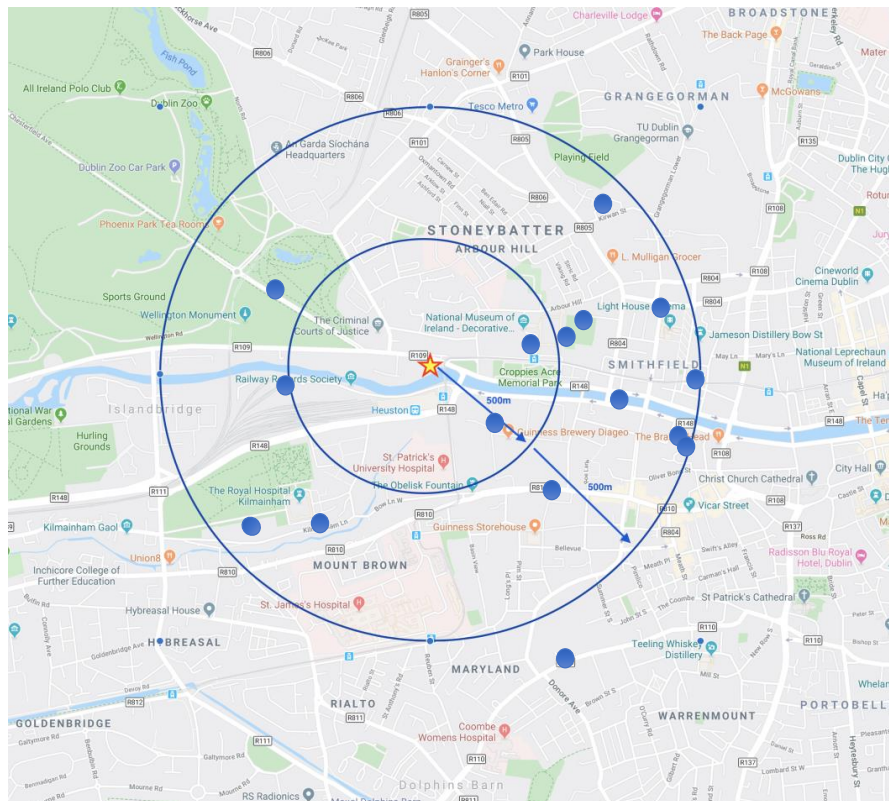
**Within 1000m:**

- St. James’s Hospital
- Thomas Court Primary Care Centre
- Cassidy’s Pharmacy
- Blackhall Pharmacy
- Lloyds Pharmacy
- Easy SOP Pharmacy
- Janet Dillon Pharmacy
- Market Pharmacy Smithfield
- Liberites CarePlus Pharmacy
- Plaza Health Smithfield
- St. James’s Medical Centre
- Medicus Medical Centre
- Charter Medical Smithfield
- Polska Przychodnia Smithfield
- Stoneybatter Family Practice
- Manor Street Family Practice
- Marinas Brilliant Smile Dental Services
- Art Medica Dental Clinic
- One Manor Place Dental Practice

**13.3 SPORTS & RECREATION**

**Within 500m:**

- Phoenix Park
- Anytime Fitness Kilmainham
- Avona Boxing Club
- The Croppies Acre Park



**Figure 11:** Map showing location of sport & recreation facilities. Each facility is represented by a blue dot.

**Within 1000m:**

- St. James's Gate Health & Fitness Club
- 1 Escape Healthclub Smithfield
- Lift Training Studios Smithfield
- Viribus Crossfit Smithfield
- FUSE Fitness Smithfield
- TU Grangegorman Playing Fields
- Arbour Hill Boxing Club
- F45 Training Grangegorman
- The Royal Gardens at the Royal Hospital Kilmainham
- St. Catherine's Sports Centre
- Marshall Art Incorporated Dublin 7
- Origins Muay Thai
- Boss Hot Yoga Studio
- Phoenix Park Playground
- Grangegorman Playground

A number of additional sports facilities exist within reasonable proximity of the site, such as the Irish War Memorial Hurling Grounds, St. Brendan's GAA Club, Navan Road United FC, Dublin Municipal Rowing Club, Dynamo Dublin FC, Bohemian FC Football Grounds, Oblate Basketball Club, Richmond Park Football Club, Liffey Gaels GAA Club all within 3km of the subject site.

**13.4 SOCIAL & COMMUNITY SERVICES****Within 1000m:**

- St. Catherine's Community Centre
- Aughrim Street Sports Hall
- St. James's Parochial Hall
- Blackhall Street St. Pauls Community Hall
- Stoneybatter Community Training Centre
- Aughrim Street Scout Group

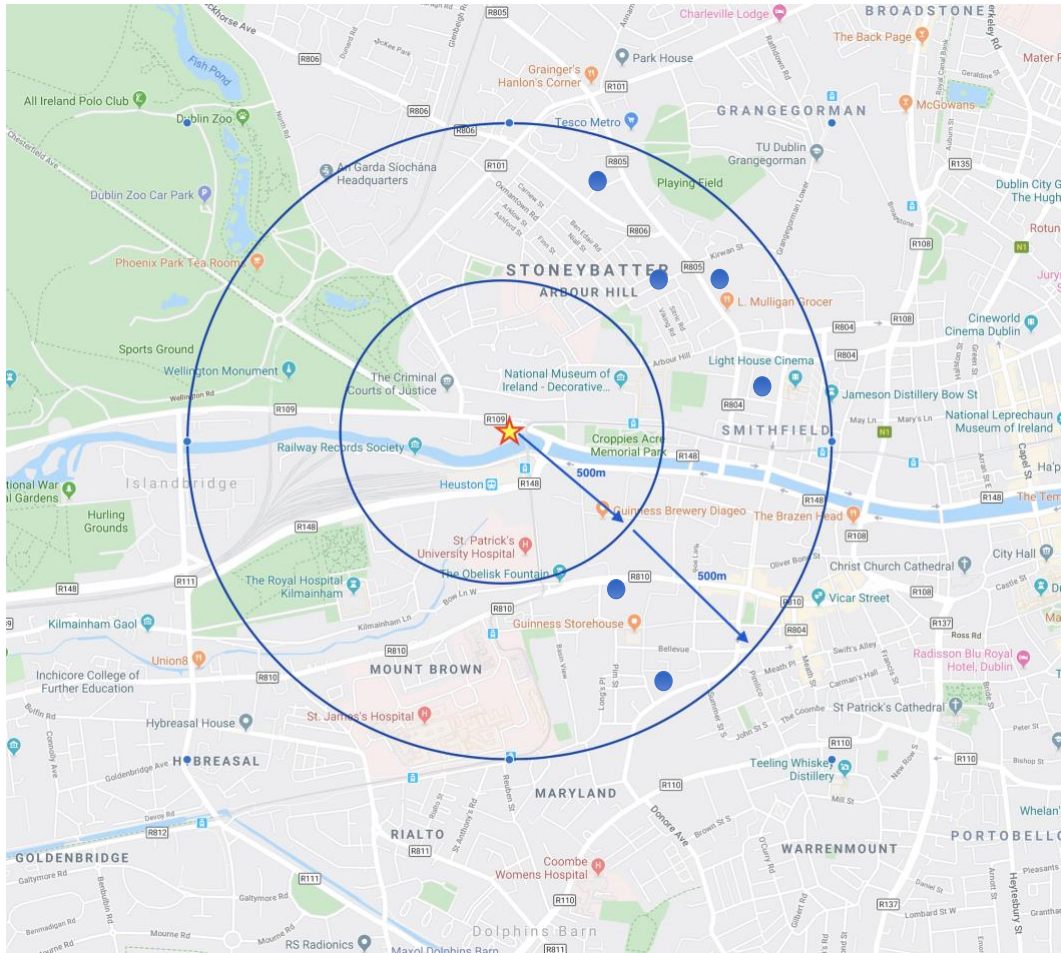


Figure 12: Map showing location of social & community facilities. Each facility is represented by a blue dot.

Inchicore Library and The National Visual Arts Library NIVAL are also both within 1.5km of the application site

**13.5 ART & CULTURE**

**Within 500m:**

- National Museum of Ireland
- Pearse Lyons Distillery
- Guinness Open Gate Brewery
- Mother's Tankstation Arts Centre
- National College of Art & Design

**Within 1000m:**

- Guinness Storehouse
- Irish Museum of Modern Art
- Lighthouse Cinema
- Jameson Distillery

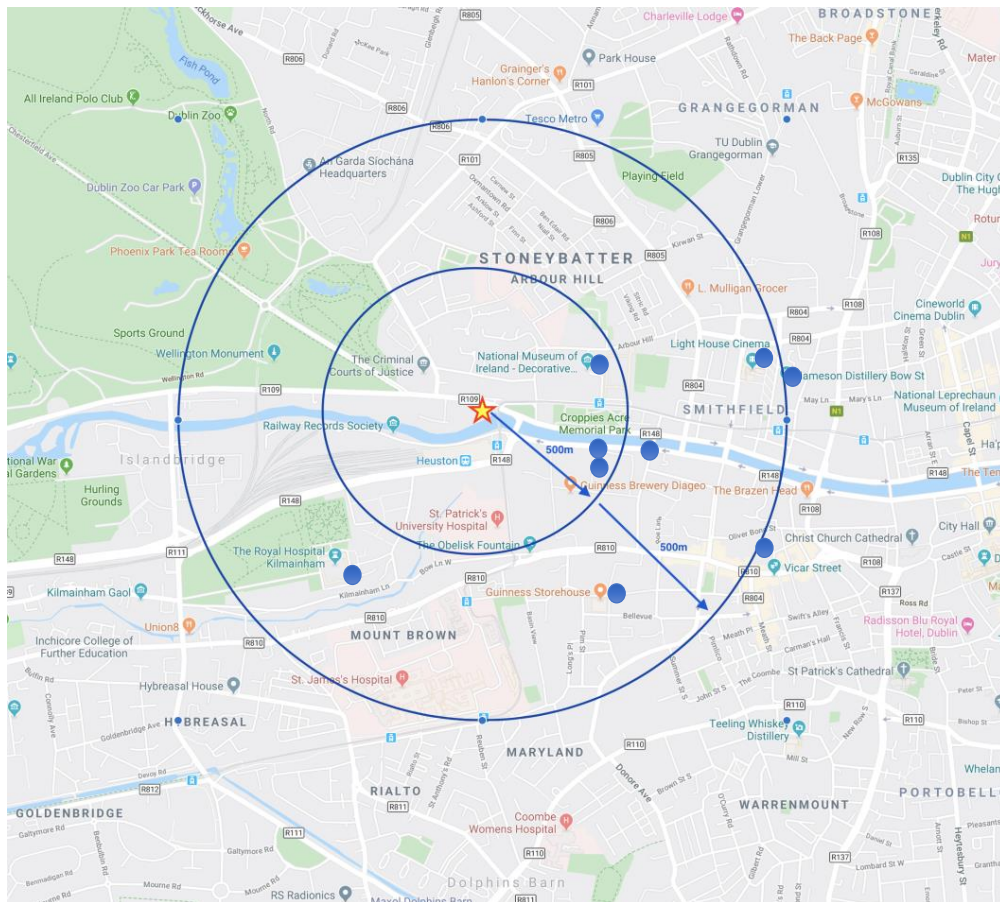


Figure 13: Map showing location of arts and culture facilities. Each facility is represented by a blue dot.

It is worth noting that a number of additional cultural facilities exist within reasonable proximity of the site, such as the Zoological Gardens, Aras an Uachtarain and Farmleigh Estate within Phoenix Park, Kilmainham Gaol, Irish War Memorial Gardens, Vicar Street Venue, Vaults Live theatre.

The site is at the western edge of Dublin City Centre, which provides a wide arts and culture offering.

**13.6 FAITH SERVICES**

**Within 500m:**

- Sacred Heart Catholic Church
- Greek Orthodox Church of the Annunciation

**Within 1000m:**

- St. James’s Catholic Church
- St. Catherine’s Church of Ireland
- Aughrim Street Parish

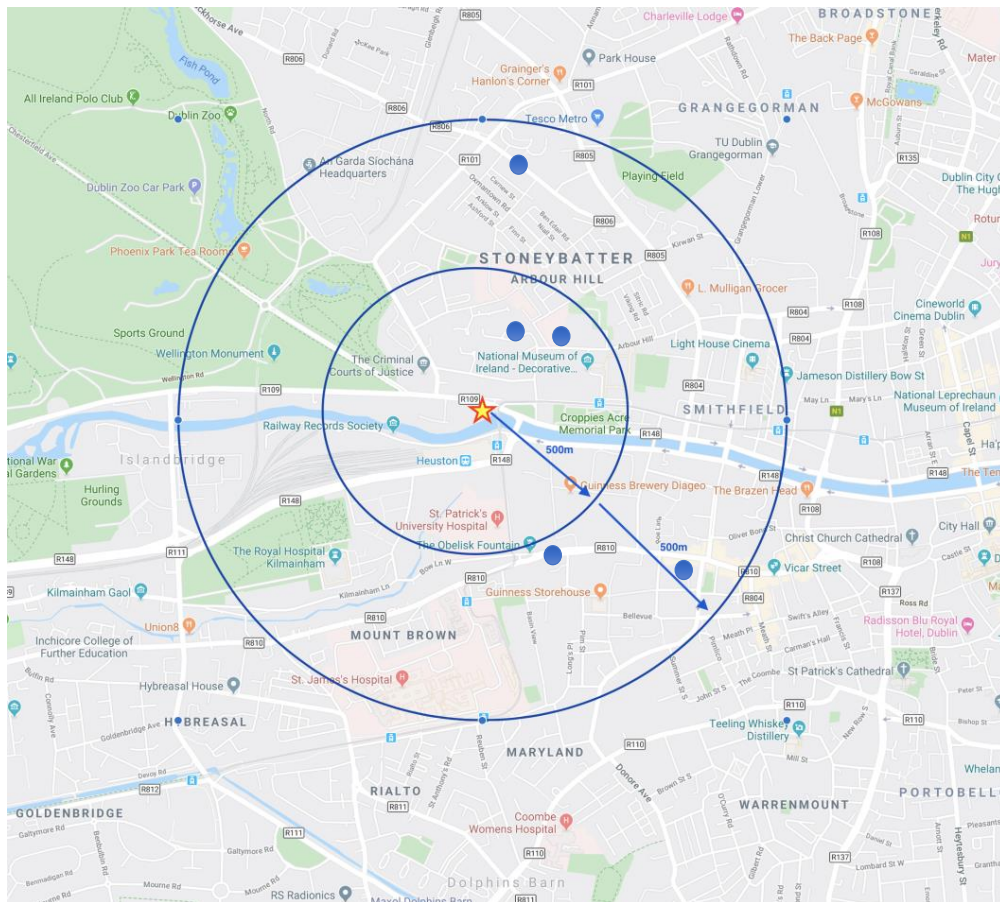


Figure 14: Map showing location of faith services. Each facility is represented by a blue dot.

## 13.7 OTHER SERVICES

### Within 500m:

- Heuston Station
- Dublin Bus routes 26, 69, C5, C6, 707, 842, 845, 51D, 52, 60, 735, C1, C2, C4, P29, 69X, X25, X27, X28, X30, X31, X32
- LUAS Red Line

### Within 1000m:

- Kilmainham Garda Station
- James's Street Credit Union
- James's Street Post Office
- Aonghus McCarthy Solicitors
- Tracy Horan & Co. Solicitors
- Cahir O' Higgins Solicitors
- Michael Kelleher Solicitors

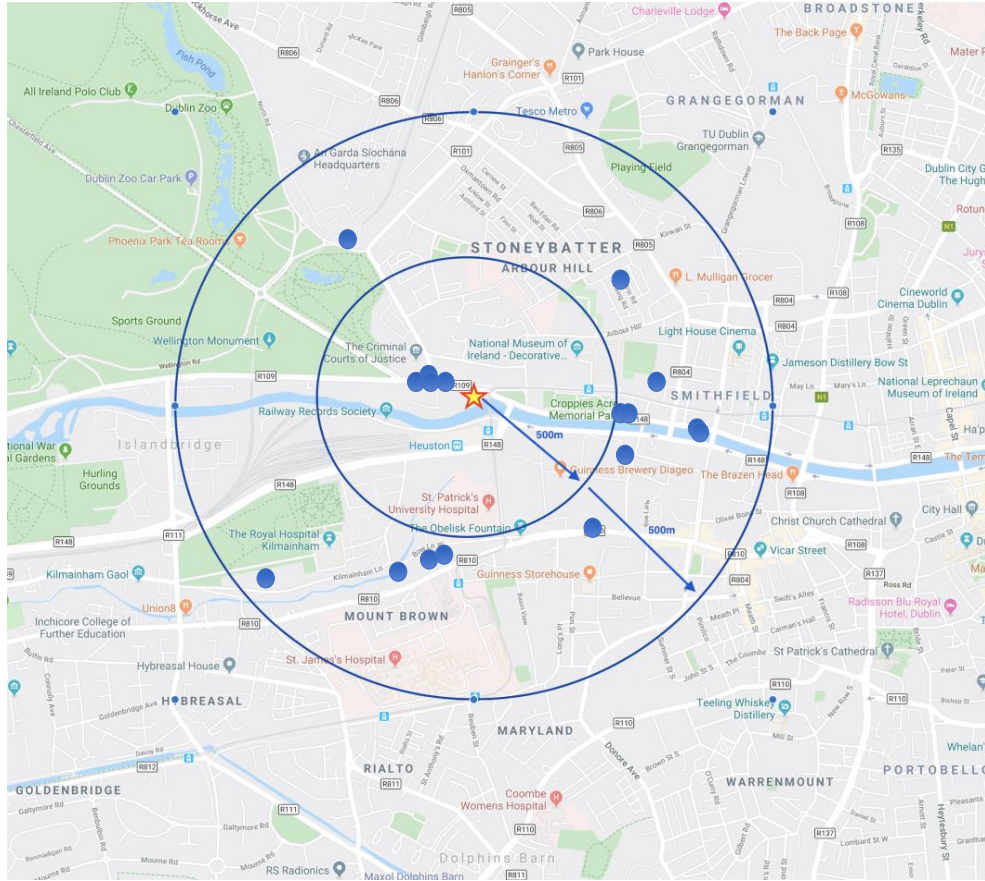


Figure 15: Map showing location of other services and facilities. Each facility is represented by a blue dot and Dublin Bus routes are represented by the blue arrows.

## 14 CONCLUSION

It is our considered professional planning opinion that the proposed minor modifications result in a modified scheme that is substantially the same in location, nature, scale and effect to that previously permitted on site. It should be supported by the Planning Authority on the grounds that:

- The application plans and particulars and related issues remain the same as those raised with the Planning Authority at s.247 consultation stage.
- The Planning Authority has determined, by letter dated 26 March 2026, that the consented scheme with proposed modifications remains substantially the same.
- The proposed modifications are consistent with the Government strategies to increase residential development, in particular higher density apartments, at suitable brownfield infill sites in Dublin City, to address the critical housing shortage.
- The proposed development is consistent with the land use, strategic site regeneration and residential development and development standards, objectives and policies of the Dublin City Development Plan 2022-2028 and other relevant Ministerial Guidelines.
- The proposed development will deliver much needed residential development within the city, at a highly accessible site immediately proximate to city centre retail, employment and amenities and a strategic public transport hub, at appropriate and sustainable density.
- The modified and new apartments proposed are designed to meet the relevant development plan and design guidelines standards for apartments, including also sunlight and daylight impact, passive surveillance of streets and spaces, and townscape visual impact.
- The proposed development is resilient to climate change and promotes sustainable transport oriented development, encouraging a modal shift from private car to sustainable modes of transport.

We confirm that we act for the Applicant in this case and would ask that all future correspondence in relation to this planning application be directed to this office.

## 15 ENCLOSURES

The following items are included with this submission: -

1. Completed Supplementary Form 19.
2. Newspaper Notice.
3. Site Notice.
4. Proof of Payment.
5. Part V Proposal Letter.
6. Part V Schedule of Accommodation and Approximate Costs.
7. Dublin City Council Part V Validation Letter.
8. Landowner Letter of Consent (The Platform ICAV)
9. Letter of Consent, Dublin City Council Parks Department
10. Letter of Consent, Dublin City Council Environment and Transportation Department
11. Applicant Consent to Agent Letter
12. Section 247 (7) Determination Letter from Dublin City Council.
13. Confirmation of Feasibility from Uisce Eireann
14. Statement of Design Acceptance from Uisce Eireann.
15. Uisce Eireann Standard Offer
16. Planning Application Report & Statement of Consistency, prepared by Stephen Little & Associates Chartered Town Planners & Development Consultants.
17. Architectural drawings, prepared by Reddy Architecture & Urbanism (refer to enclosed schedule)
18. Architectural Design Statement, including Housing Quality Assessment and Schedule of Accommodation prepared by Reddy Architecture & Urbanism
19. Civil, Structural & Transport Statement, prepared by ARUP Group
20. Internal Daylight Analysis Report, prepared by IN2 Engineering Design Partnership
21. Climate Action and Energy Statement, prepared by IN2 Engineering Design Partnership
22. Operational Waste Management Plan, prepared by AWN Consulting LTD
23. Appropriate Assessment and Natura Impact Statement, prepared by Altemar
24. Addendum Architectural Heritage Impact Assessment, prepared by ARC Architectural Consultants.
25. Addendum Landscape and Visual Impact Assessment, prepared by ARC Architectural Consultants.

## 16 APPENDIX A: ENVIRONMENTAL IMPACT ASSESSMENT SCREENING

### 16.1 INTRODUCTION

Extant permission SHD ABP-310567-21 for 29-storey Block A, including 198no. 'Build to Rent' apartments and 1no. restaurant/café (c.187 sq m), was accompanied by an Environmental Impact Assessment Report (EIAR). This EIAR assessed the cumulative impact of the Block A development in combination with development previously permitted and subject of an EIAR under SHD ABP-306569-20 (321no. BTR apartments, office, retail, café/restaurant in 8-13 storey Blocks B & C, demolition, conservation and site works). All within the same application site, measuring c.0.82ha.

The Commission, as the competent authority found that SHD ABP-310567-21, in combination with SHD ABP-306569-20, subject to the implementation of the mitigation measures as set out in the EIAR, Natura Impact Statement (NIS) and Construction Environmental Management Plan (CEMP) and the planning conditions of the permission, would not be likely to have significant effects on European sites and that the environmental effects would be acceptable.

Since that time, the consented scheme has been reinforced by replacement LRD permissions. Substantially the same large scale residential-led, mixed use development, with associated demolition, conservation and site works has been re-permitted under LRD6074/24-S3 and ABP-310567-21 as amended by LRD6042/23-S3A and LRD6080/25-S3A. These permissions are all subject of the same planning conditions as the original permissions (including adherence with EIAR, NIS and CEMP mitigation measures). EIA Screening for these replacement permissions was approved by Dublin City Council, on the strength of an EIAR having already been carried out for the majority of the development, and that the additional alterations were not likely to give rise to new or different environmental effects.

We would respectfully submit to Dublin City County Council, that given the minor nature and scale of the proposed modifications to the consented scheme, subject of this latest LRD amendment application, and based on previous EIA and EIA Screening by the relevant competent authorities, and having regard to the findings of the specialist assessments that accompany this application, the proposed modifications (change of apartment mix, uplift of 16no. apartments and sundry modifications) would not be likely to have new or additional significant effects on the environment.

It is our consequent professional opinion that an EIAR is not required for the proposed modifications to the consented scheme. This opinion is further supported by the planning authority's s.247(7) confirmation that:

- (a) *"The proposed development is substantially the same as the permitted development, and*
- (b) *The nature, scale and effect of any alterations to the permitted development are not such that require the consultation process to be repeated.*

*The Planning Authority has determined that no further consultation is required under Section 247 in relation to the proposed development."*

However, we recognise that Dublin City Council is the Competent Authority in this matter.

### 16.2 PROPOSED MODIFICATIONS TO CONSENTED SCHEME

The proposed development largely comprises minor modifications to a consented SHD/LRD scheme already permitted under:

- **SHD ABP-310567-21:** 29-storey Block A, including 198no. 'Build to Rent' apartments and 1no. restaurant/café (c.187 sqm), within the same 0.82ha site area. Permission withers June 2033.
- **LRD6042/23:** 8-storey Block B2, including 40no. 2-bed apartments, 1no. café/restaurant unit (236 sq m) and 1no. cultural unit (c. 52 sqm), and amendments at the interface with ABP-310567-21 Block A, within the same 0.82ha site area. Permission withers June 2033.

- **LRD6074/24-S3:** 8-13 storey Blocks B1 & C, including 316no. apartments, retail, café/restaurant, community, cultural, conservation and site works (superseding SHD ABP-306569-20, but tied to the same planning conditions), within the same 0.82ha site area. Permission withers June 2033.
- **LRD6080/25-S3A:** Amendments to SHD ABP-310567-21 relating to Block A (additional fire core and floor plan adjustment) and Block B2 (amendment to interface with Block A accommodating 8no. additional apartments).

Overall, the consented scheme, broadly comprises residential-led mixed use development of **562no. apartments**, 2no. café/restaurants, retail, community and cultural uses, in blocks ranging from 8-13 and 29 storeys, with associated demolition, conservation, landscaping and site works, all on a site measuring 0.82 ha. It has been subject of EIAR and EIA screening by the competent authorities and is subject of the same planning conditions as the original permissions, including relevant EIAR, NIS and CEMP mitigation measures.

Proposed modifications (Revision 2) to the residential unit mix and associated localised reconfiguration of the floor plan and elevation details, of the otherwise consented large-scale residential scheme at No. 42A Parkgate Street will result in an increased overall total of 569no. apartment units (an uplift of 7no. units). This will be achieved by the following proposals:

- Permitted 2no. 2-beds (total 6no.) to proposed **4no. studios (total 12no.)**, repeated across L07 – L09 (**3 levels**) in Blocks B1 & C.
- Permitted mezzanine residential amenity (151sqm) to proposed **residential amenity (44sqm)** and **1no. 3-bed (4-person)** in Block B1.
- Alterations to elevation **fenestration** and internal **floor plan reconfiguration** of 2-bed (4-person) unit, to create 3-bed (4-person) unit, repeated across L00-L08 (9 levels) in Block C (**total 9no.**).
- Alterations to elevation **fenestration** and internal **floor plan reconfiguration** of 2-bed (4-person) unit, to create **3-bed (4-person) unit**, repeated across L01-L11 (11 levels) in Block B1 (**total 11no.**).
- Internal **floor plan reconfiguration** of 2-bed (4-person) unit, to create **3-bed (4-person) unit**, repeated across L01-L27 (27 levels) in Block A (**total 27no.**).

Beyond localised adjustments, no other changes are proposed to the associated and ancillary demolition, conservation, landscaping and site development works, including works to the river wall, permitted under DCC Ref. LRD6074/24-S3.

The consented scheme with the proposed modifications subject of this LRD application, remains substantially the same (location, built form, intensity and nature of use) as that already consented. It will have no likely new or significantly different environmental impacts (see table below). As such, the EIAR findings would remain the same (see table below).

The Planning Authority, in its determination under Section 247(7) of the Planning and Development Act 2000, as amended, further confirms the minor nature of development proposed, stating: -

*The Planning Authority has compared the proposed development to the permitted development, and considered whether the —*

*(a) the proposed development is substantially the same as the permitted development, and*

*(b) the nature, scale and effect of any alterations to the permitted development are not such that require the consultation process to be repeated.*

*The Planning Authority has determined that no further consultation is required under Section 247 in relation to the proposed development.*

### 16.3 EIA SCREENING ASSESSMENT

Having regard to all of the above, we would expect that the conclusion of the planning authority in respect of the proposed modifications to the consented scheme would be that, subject to the

implementation of the mitigation measures set out in the EIAR for extant permission ABP-310567-21, and compliance with the same planning conditions of the consented scheme, that the effects on the environment of the proposed modifications, by themselves, as part of the consented scheme and in combination with other development in the vicinity, would continue to be acceptable, in the same manner as previously determined.

In respect of the EIA completed by An Coimisiun Pleanála in the case of SHD ABP-310567-21 the following assessment and conclusion of the Commission remains applicable, in our professional planning opinion:

*The Board completed an environmental impact assessment of the proposed development, taking into account:*

- (a) The nature, scale and extent of the proposed development;*
- (b) The environmental impact assessment report and associated documentation submitted in the planning application;*
- (c) The submissions from the planning authority, the observers and the prescribed bodies in the course of the application; and*
- (d) The Inspector's Report.*

*The Board considered that the environmental impact assessment report, supported by the documentation submitted by the developer, adequately identifies and describes the direct, indirect, secondary and cumulative effects of the proposed development on the environment.*

*The Board agreed with the examination, set out in the Inspector's Report, of information contained in the environmental impact assessment report and associated documentation submitted by the developer and submissions made in the course of the planning application.*

*The Board considered and agreed with the Inspector's reasoned conclusions that the main significant direct and indirect effects of the proposed development on the environment are and would be mitigated as follows:*

- Traffic and transportation impacts: the development will give rise to short-term construction traffic impact, mitigated by traffic management and other environmental considerations in the Construction Environmental Management Plan. The upgrade of pedestrian and cycle routes will provide a long-term positive impact.*
- Air Quality and Climate: Short-term negative impacts on the air quality from construction will be mitigated by the use of good practice construction methods and the implementation of a Construction Environmental Management Plan.*
- Noise and Vibration: during the construction phase will be negative and short term and mitigated by compliance with all best practice construction methods such as noise restricting plan, restriction of construction hours and liaison with the public.*
- Biodiversity impacts: No significant impacts will occur on any areas identified for local or national protection and measures to protect the water quality of the River Liffey will mitigate against any impacts on the aquatic environment or habitats with any European Sites.*
- Archaeology, Architecture and Cultural Heritage: The potential for short term negative impact on any archaeology will be mitigated through monitoring of groundworks during construction. The impact on the character and setting of the protected structures on the adjoining site will be mitigated by the buildings high quality architectural style and finishes.*
- Precautionary measures to prevent any contamination of water courses and other measures in the Construction Management Plan will prevent any significant negative impact on land and soil.*

- *Water impacts: Potential impacts on water quality in the area will be mitigated by construction management measures and implementation of Sustainable Drainage System measures.*
- *Landscape and Visual: impacts are mitigated by the high-quality architectural style and finish of the building.*
- *An upgrade of utilities and telecommunications will have a long-term positive impact for the site and surrounding area.*
- *Resource and Waste Management impacts which will be mitigated by preparation of site specific Construction and Demolition Waste Management Plan.*
- *The increase in housing stock will have a direct positive impact on the population of Dublin City.*

*The Board completed an environmental impact assessment in relation to the proposed development and concluded that, subject to the implementation of the mitigation measures set out in the environmental impact assessment report and compliance with the conditions set out below, the effects on the environment of the proposed development, by itself and in combination with other development in the vicinity, would be acceptable.*

In further support of our opinion, we refer the Planning Authority to the table below which sets out the environmental effects of the proposed modifications to the consented scheme, compared to the consented scheme permitted under LRD6074/24-S3 & SHD ABP-310567-21 as amended by LRD6042/23-S3A and LRD6080/25-S3A. Bearing in mind that the planning authority has determined, under section 247(7) of the Planning and Development Act 2000, as amended, that:

- (a) *“The proposed development is substantially the same as the permitted development, and*
- (b) *The nature, scale and effect of any alterations to the permitted development are not such that require the consultation process to be repeated.”*

<b>Environmental Effects of the Proposed Alterations compared to the Permitted SHD ABP-310567-21</b>			
<b>Environmental Factor</b>	<b>Headings Under which the Environmental Factors were Assessed</b>	<b>Phase</b>	<b>Effect Compared to Consented Scheme</b>
Material Assets	Traffic and Transport	Construction Phase	<u>Neutral, imperceptible and permanent</u>
		Operational Phase	Comparatively, the same likely impact is envisaged during construction/ operational phase of the proposed modifications.  There is no material change to pedestrian, bicycle or vehicular site access; no additional car parking; no change to proximity of public transport network.
Climate	Air Quality	Construction Phase	<u>Neutral, imperceptible and permanent</u>
		Operational Phase	Comparatively, the same likely impact is envisaged during construction/ operational phase of the consented scheme with proposed modifications.
Climate		Construction Phase	

		Operational Phase	<p><u>Neutral, imperceptible and permanent</u></p> <p>Comparatively, the same likely impact is envisaged during construction/ operational phase of the of the consented scheme with proposed modifications.</p>
Air	Noise & Vibration	Construction Phase	<p><u>Neutral, imperceptible and permanent</u></p> <p>Comparatively, the same likely impact is envisaged during construction/ operational phase of the consented scheme with proposed modifications.</p>
		Operational Phase	<p>Comparatively, the same likely impact is envisaged during construction/ operational phase of the consented scheme with proposed modifications.</p>
Biodiversity		Construction Phase	<p><u>Neutral, imperceptible and permanent</u></p> <p>Comparatively, the same likely impact is envisaged during construction/ operational phase of the consented scheme with proposed modifications.</p> <p>Only localised, minor adjustments to the permitted landscape works are proposed.</p>
		Operational Phase	<p>Comparatively, the same likely impact is envisaged during construction/ operational phase of the consented scheme with proposed modifications.</p> <p>Only localised, minor adjustments to the permitted landscape works are proposed.</p>
Cultural Heritage	Archaeology and Cultural Heritage	Construction Phase	<p><u>Neutral, imperceptible and permanent</u></p> <p>Comparatively, the same likely impact is envisaged during construction/ operational phase of the consented scheme with proposed modifications.</p>
		Operational Phase	<p>Comparatively, the same likely impact is envisaged during construction/ operational phase of the consented scheme with proposed modifications.</p>
Cultural Heritage	Architectural Heritage Impact Assessment	Construction Phase	<p><u>Neutral, imperceptible and permanent</u></p> <p>Comparatively, the same likely impact is envisaged during construction/ operational phase of the consented scheme with proposed modifications.</p> <p>We refer the Planning Authority to the enclosed Addendum Architectural Heritage Impact Assessment Report, prepared by ARC which concludes: -</p> <p><i>The proposed modifications to the permitted development do not involve any works to structures of architectural heritage value, whether they are protected structures or not. Nor are the proposed modifications to the development likely to result in any material or perceived effects on the setting of structures of architectural heritage value over and above effects occasioned by the permitted development. Therefore, the proposed modifications will not give rise to any direct impact on the architectural heritage of any structures on the subject site or on their setting.</i></p>
		Operational Phase	<p>Comparatively, the same likely impact is envisaged during construction/ operational phase of the consented scheme with proposed modifications.</p> <p>We refer the Planning Authority to the enclosed Addendum Architectural Heritage Impact Assessment Report, prepared by ARC which concludes: -</p> <p><i>The proposed modifications to the permitted development do not involve any works to structures of architectural heritage value, whether they are protected structures or not. Nor are the proposed modifications to the development likely to result in any material or perceived effects on the setting of structures of architectural heritage value over and above effects occasioned by the permitted development. Therefore, the proposed modifications will not give rise to any direct impact on the architectural heritage of any structures on the subject site or on their setting.</i></p>
Landscape and Visual		Construction Phase	

	Landscape and Visual Impact Assessment	Operational Phase	<p><u>Neutral, imperceptible and permanent</u></p> <p>Comparatively, the same likely impact is envisaged during construction/ operational phase of the consented scheme with proposed modifications.</p> <p>We refer the Planning Authority to the enclosed Landscape and Visual Impact Assessment, prepared by ARC which confirms that the proposed amendments will not result in any change to the previously assessed extent of potential landscape and visual effects.</p>
Water		Construction Phase	<p><u>Neutral, imperceptible and permanent</u></p>
		Operational Phase	<p>Comparatively, the same likely impact is envisaged during construction/ operational phase of the consented scheme with proposed amendments.</p> <p>We refer the Planning Authority to the enclosed Letter, prepared by ARUP which confirms that the proposed modifications will not require any change to the surface water drainage design as permitted.</p>
Land and Soils		Construction Phase	<p><u>Neutral, imperceptible and permanent</u></p>
		Operational Phase	<p>Comparatively, the same likely impact is envisaged during construction/ operational phase of the consented scheme with proposed modifications.</p> <p>The basement is proposed to be reduced in area. No new subterranean works are proposed.</p> <p>Refer to the enclosed Letter, prepared by ARUP which confirms that the proposed modifications do not change the findings of the Basement Impact Assessment for the consented scheme, submitted with LRD6074/24-S3.</p>
		Operational Phase	
Material Assets	Waste Management	Construction Phase	<p><u>Neutral, imperceptible and permanent</u></p>
		Operational Phase	<p>Comparatively, the same likely impact is envisaged during construction/operational phase of the consented scheme with proposed modifications.</p> <p>There are proposed minor adjustments to the bin storage layouts. We refer the Planning Authority to the enclosed Operational Waste Management Plan, prepared by AWN Consulting.</p>
Population and Human Health		Construction Phase	<p><u>Neutral, imperceptible and permanent</u></p>
		Operational Phase	<p>Comparatively, the same likely impact is envisaged during construction/</p>

			operational phase of the consented scheme with proposed modifications.  There is a proposed change to apartment mix and an uplift of 7no apartments. There is a marginal uplift in the total number of dwellings and occupancy by prospective residents.
Material Assets	Utilities and Telecommunications	Construction Phase	<u>Neutral, imperceptible and permanent</u>
		Operational Phase	Comparatively, the same likely impact is envisaged during construction/ operational phase of the consented scheme with proposed modifications.

## **17 APPENDIX B: BUILDING HEIGHT GUIDELINES (2018) – SECTION 3.2 CRITERIA**

Section 3.2 Criteria	Response in the Case of ABP-310567-21 (Block A SHD Extant Consent)	LRD Amendments Now Proposed
<b>At the scale of the relevant city/town</b>		
<p><i>The site is well served by public transport with high capacity, frequent services and good links to other modes of public transport.</i></p>	<p>The application site is located at a strategic public transportation hub and one of the most highly accessible locations in the city. Regional and intercity rail services are available at the immediately adjacent Heuston Station. The Luas red line is available at either Heuston or Museum stops, and numerous frequent bus routes serve Parkgate Street and Heuston.</p>	<p><b>No change to location of building.</b></p>
<p><i>Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.</i></p>	<p>Refer to chapter 13 'Landscape and Visual Impact Assessment' (LVIA) of the EIAR, prepared by ARC Architectural Consultants and Grade I Conservation Architects, for visual impact in the context of the historic setting of the site.</p> <p>The EIAR LVIA generally concluded that the proposed development would make a positive contribution to the city skyline, at this landmark site, within a strategic regeneration area at the western Hueston gateway to the city centre, and having regard to the historic setting if this area. No significant adverse visual impacts were predicted</p>	<p><b>No change to building height proposed.</b></p> <p><b>Refer to enclosed Addendum Landscape and Visual Impact Assessment Report, prepared by ARC for details.</b></p>
<p><i>On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.</i></p>	<p>The site is identified in the Development Plan as having the capacity for a tall, landmark building.</p> <p>The height and slenderness was previously welcomed in principle. A new approach to architectural expression and materiality seeks to respond to the previous recommendation of the Board's Inspector to create a more distinctive, rich and enduring landmark building, containing excellent residential accommodation, at this pivotal city site.</p> <p>Refer to Architects Design Statement, prepared by Reddy Architecture and Urbanism and Glen Howells Architects, for further discussion of the architectural intent and design details of the proposed new building.</p>	<p><b>No change to permitted building height.</b></p> <p><b>We refer the Planning Authority to the enclosed Architectural Design Statement, prepared by Reddy Architecture + Urbanism for details.</b></p>
<b>At the scale of district/ neighbourhood/ street</b>		
<p><i>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.</i></p>	<p>The proposed building has been conceived as a tall, high quality, landmark building that sits comfortably with the consented scheme, the Parkgate streetscape, the river corridor and the historic and emergent city surroundings.</p>	<p><b>No material change to slender profile, architectural expression or materiality.</b></p>

	<p>The height and slenderness of the previously proposed tower were broadly welcomed in the previous case. The base of the tower seeks to create a human scale and activate Parkgate Street with the consented public plaza and river walk with the proposed ground floor café/restaurant use. The middle and crown extend vertically as a tall, slender landmark at the western gateway to the city centre.</p> <p>The architectural expression and materiality is improved to create a distinctive, attractive and enduring landmark building.</p> <p>Together with the wider consented scheme it will deliver a mix of uses and excellent residential accommodation, at this highly accessible regeneration site.</p> <p>Prospective residents of the tower will enjoy high quality, well managed living accommodation and residential amenities. They will also undoubtedly appreciate the spectacular views afforded by the tower, across the city.</p>	
<p><i>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials/ building fabric well considered.</i></p>	<p>The redesigned 30-storey Block A building delivers height and slenderness, to create refined and elegant modern building appropriate for Dublin's unique cityscape.</p> <p>The tower is formed by 3 curved planes, with three simple elements clearly read in its vertical expression: A translucent base that provides active use at ground floor and floats the rest of the building above the river wall and the shoulder height at Parkgate Street. An articulated middle of solid and glass, with richly detailed masonry and double order openings, creating sculptural articulation in vertical form in reference to the surrounding historic architecture. A lantern top, created with the extension of the façade blades to varying heights of 5m to 9m to give the building an evocative crown that changes in different view orientations. All creating a unique landmark building of architectural excellence, quality finish and superior residential accommodation appropriate to this central site.</p> <p>The proposed reconstituted stone and glass materials have been chosen having particular regard to durability, the local climate and the creation of variation, depth and architectural interest, which in combination with the consented development will present a coherent whole. We refer the Board to Sections 4 to 6 of the Architects Design Statement for further information on the materials</p>	<p><b>No change proposed to building profile, articulation or materials.</b></p>
<p><i>The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling</i></p>	<p>The Development Plan highlights that Heuston is a suitable location for taller buildings as a western counterpoint to the Docklands. The proposed development positively addresses Parkgate Street, the River Liffey and views</p>	<p><b>No material change to building location or design.</b></p>

<p><i>additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009)</i></p>	<p>along the city quays, and will sit comfortably as a tall, slender landmark at a pivotal regeneration site at the edge of the city centre.</p> <p>In combination with the wider consented development, site permeability will be enhanced through the provision of the public plaza and riverside walkway, with visual connections to other notable parts of the city, and with the potential for future onward links along the river edge.</p> <p>A Flood Risk Assessment, prepared by Arup accompanies this SHD application. This identifies that the flood risk to the development is low. Finished floor levels have been raised to allow for climate change, and access and egress to the site will not be compromised during a flood event. We refer the Board to the enclosed Flood Risk Assessment for further details.</p>	<p><b>Refer to enclosed Addendum LVIA, prepared by ARC.</b></p> <p><b>The proposed amendments present no new flood risk. We refer the Planning Authority to the enclosed Letter, prepared by ARUP for confirmation.</b></p>
<p><i>The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.</i></p>	<p>The site is strategically located at the termination of the city quays and beside Heuston, which acts as a gateway to the city from the west. The development site has remained underutilised and identified for regeneration for many years.</p> <p>The proposal for a tall landmark building, of excellent design quality, is appropriate to the site’s pivotal location and redevelopment potential, which currently is not fully realised. The development of a tall building to complete the consented development at this site has been welcomed in principle by the Board in the case of ABP – 306569- 20.</p> <p>The proposed development has regard to the guiding principles of SDRA 7 and the criteria for high buildings set out in the Development Plan (see Section 12 for Statement of Consistency with the Development Plan objectives). It will provide a visible landmark and placemaking function at this gateway location and enhance the legibility of this part of the city.</p>	<p><b>The modified scheme interacts and integrates with the wider consented scheme and surrounding urban area in the same manner.</b></p>
<p><i>The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.</i></p>	<p>The development will provide for a greater range of adaptable one, two and 3 bed dwelling typologies, within a well-managed environment, and at highly accessible location adjacent to the city centre and excellent public transport.</p> <p>The development provides supporting residential amenities and a café/ restaurant uses. It also benefits from and complements the mixed use scheme consented under ABP-306569-20.</p>	<p><b>The proposed development, as modified, will continue to deliver the same ground floor mix of uses. It will form a composite part of the wider mixed use consented scheme in the same manner.</b></p> <p><b>The modified proposal will continue to deliver an appropriate of dwelling typologies, with a general reduction in quantum of studio units in favour of 1-bed, 2-bed and 3-bed units within Blocks</b></p>

		A, B1, B2 and C. The mix of BTR and 'build to sell' standard apartments in the overall scheme meets the relevant standards of the Development Plan and relevant Ministerial Guidelines
<b>At the scale of the site/ Building</b>		
<p><i>The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.</i></p> <p><i>Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for daylighting'</i></p> <p><i>Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution</i></p>	<p>The building design is informed by a Daylight and Sunlight Analysis prepared by IN2 Engineering Design Partnership. This demonstrates that all living/dining and bedroom spaces are compliant with the BRE best practice guidelines. The shadow analysis results indicate no significant shadowing of surrounding buildings and where shadowing occurs it would be for a minimal period of time. The proposed amenity spaces achieve excellent sunlight and daylight availability. The assessment also concludes that the proposed development will not have a negative effect on the neighbouring amenity space at Parkgate Place or on the residences at Montpellier Hill.</p>	<p><b>Refer to the enclosed Sunlight &amp; Daylight Assessment, prepared by IN2 Engineering Design Partnership which confirms that the scheme is compliant.</b></p>
<b>Specific Assessments: The Guidelines state that at some scales, specific assessments may be required for taller buildings. These include:</b>		
<p><i>Assessment of micro-climatic effects</i></p>	<p>A Site Wind Analysis prepared by IN2 Consulting Engineers demonstrates that the proposed open spaces will benefit from a good micro-climate.</p> <p>Daylight &amp; Sunlight Analysis, prepared by IN2 Consulting demonstrates that the proposed development will benefit from excellent levels of</p>	<p><b>No new adverse impacts arise.</b></p> <p><b>Refer to the enclosed Sunlight &amp; Daylight Assessment, prepared by</b></p>

	sunlight and daylight access and that the Block A redesign has a negligible impact on the consented scheme ABP 306569-20	<b>IN2 Engineering Design Partnership (see above)</b>  <b>Refer to enclosed Micro-Climatic Impact Assessment- Wind, prepared by IN2 Engineering Design Partnership. Design mitigation built in to ensure private and public amenity spaces are appropriate / comfortable for use.</b>
<i>Potential impacts on birds/ bats</i>	The Biodiversity Chapter of the EIAR, prepared by Moore Group, considers the potential for impacts on birds/ bats and concludes that it is not predicted that there would be any effect on birds or bats in terms in terms of flight lines, collision or artificial lighting impacts.	<b>No material change to location, nature or extent of development proposed. Finding would remain the same.</b>
<i>An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links</i>	An updated Telecoms Assessment is enclosed with the application. The proposed development includes proposed telecommunications antennae on the roof of consented Block B1 to enable retention of microwave telecommunications channels, as may be necessary. No new considerations arise compared to the previous scheme. We refer the Board to the accompanying architectural drawings and also to the 'Specific Assessment – Section 3.2 of the Building Height Guidelines (2018)', prepared by ISM for proposed specifications.	<b>No change to the Telecoms Report submitted under LRD6074/24-S3.</b>
<i>Impact on safe air navigation</i>	It is not anticipated that buildings of this height would impact on safe navigation. The applicant has consulted with the Irish Aviation Authority (IAA) on the proposed development (see IAA response enclosed dated 09 April 2021). The IAA is satisfied that a suitably worded planning condition would seek to agree the erection of an appropriate obstacle warning light on the proposed building. Also, that a minimum 30 days notification of intention to erect cranes on the site is required. The applicant can confirm that it will comply with these requirements.	<b>No change to building height proposed. Same condition can be applied in respect of notification prior to erection of cranes on site at construction stage.</b>
<i>Urban Design Statement</i>	We refer the Board to the Architectural Design Statement provided by Reddy Architecture and Urbanism and Glenn Howells Architects.	<b>Refer to enclosed Architectural Design Statement, prepared by Reddy Architecture + Urbanism.</b>
<i>Relevant environmental assessments</i>	This planning application is accompanied by an Environmental Impact Assessment Report and Natura Impact Statement.	<b>Refer to Appendix A of the enclosed Planning Report &amp; Statement of Consistency, prepared by Stephen Little and Associates, for EIA</b>

		<p>Screening. Concludes no significant or new adverse environmental affects likely as a consequence of the proposed modifications. An EIAR does not accompany the application.</p> <p>Refer to enclosed Natura Impact Statement, prepared by Altemar Ecological Consultants.</p>
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