DOWNEY
29 Merrion Square, D02RW64

PLANNING STATEMENT & STATEMENT OF CONSISTENCY

Proposed Modifications to

Permitted LRD Development LRD6057/24-S3A, as modified by Reg. Ref. WEBLRD6103/26-S3

Lands at 23-28 Prussia Street, Dublin 7

Applicant: Randalswood Construction Ltd.

September 2026

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PART A – PLANNING STATEMENT

1.0 INTRODUCTION

DOWNEY, Chartered Town Planners, 29 Merrion Square, Dublin 2, D02 RW64, have prepared this planning statement and statement of consistency report, on behalf of our client and the applicant, Randalswood Construction Ltd., to support a planning application for proposed modifications to a previously permitted Large-scale Residential Development (LRD) granted under planning permission Reg. Ref. LRD6057/24-S3A, and as amended by Reg. Ref. WEBLRD6103/26-S3, on lands at 23 - 28 Prussia Street, Dublin 7. The proposed development, as per the statutory notices, is to provide for the following:

> *"We, Randalswood Construction Ltd., intend to apply for permission for development on lands at 23-28 Prussia Street, Dublin 7 (D07 X9X6, D07 FW30 & D07 PAF1), (located at the junction of Prussia Street and St. Joseph's Road, and bounded by No. 29 Prussia Street (Protected Structure) to the north, No. 22 Prussia Street to the south, and TU Dublin, Grangegorman Campus and boundary wall (Protected Structure) to the east). The development will consist of proposed modifications to the previously permitted Large-scale Residential Development (LRD) (permitted under planning permissions Reg. Ref. LRD6057/24-S3A and amended under Reg. Ref. WEBLRD6103/26-S3), including the provision of 10 no. additional apartment units (110 no. permitted units to now provide a total of 120 no. apartment units i.e. a total of 74 no. 1 beds, 43 no. 2 beds, 2 no. 3 beds, and 1 no. 4 bed) as follows: Modifications to Block C from a total of 53 no. permitted apartments comprising of 34 no. 1 beds and 19 no. 2 beds, in a permitted building ranging from 7-8 storeys in height, to now provide two additional storeys to this block, to provide for a total of 63 no. apartments comprising of 40 no. 1-beds and 23 no. 2-beds, with modifications to the unit mix of the permitted seventh floor, in a building now ranging from 7-10 storeys in height, and all apartments provided with private balconies/terraces to south, east and west elevations; 16 no. additional cycle parking spaces to now provide a total of 240 no. cycle parking spaces on site including spaces at undercroft, surface and on Prussia Street, and all associated site works necessary to facilitate the development. The application may also be inspected online at the following website set up by the applicant: www.prussiastreetrevisions2lrd.ie"*

Under Reg. Ref. LRD6057/24-S3A, permission was granted for 102 no. residential units and a café within 3 no. Blocks (Block A, Block B, and Block C). Under Reg. Ref. WEBLRD6103/26-S3, permission was granted for design modifications to the parent permission for an additional 8 no. residential units (110 no. units in total), through a revised unit mix set out in Block B and Block C. Construction work is on-going under the above permissions. The proposed amendments under the subject application involve the addition of 10 no. apartment units within 2 no. additional storeys within Block C, resulting in further changes to the apartment numbers and mix of the development. The development will further include changes to the elevations to reflect the newly revised apartment Block C, which is proposed to range from 7-10 storeys. No works are proposed to Block A or Block B in the subject application. For further information on these proposed modifications, please refer to the enclosed drawings and documentation prepared by C+W O'Brien Architects.

For details on the original design intent and overall approach for the entirety of the permitted scheme, please refer to the architectural drawings and Architectural Design Statement submitted as part of the permitted scheme application under Reg. Ref. LRD6057/24-S3A, as well as the design statement submitted under separate cover of the subject application.

It is hereby submitted that the proposal of additional 10 no. units to now provide 120 no. apartments will continue to offer an efficient use of land on this infill site in inner City Dublin, adjacent to a third level institute, TU Dublin Grangegorman Campus. The development subject to the proposed amendment application and as previously recognised by Dublin City Council, provides an ideal opportunity for residential development and is compatible with the existing built environment of the area. Given the site's strategic location, it is considered that the proposed amendment to the previously permitted scheme provide for an appropriate density and takes into consideration the emerging context of the wider, adjoining, Grangegorman area, which is an assigned Strategic Development Regeneration Area (SDRA).

This planning statement sets out the planning rationale and justification for the proposed amendments to apartment Block C and demonstrates how it accords with the proper planning and sustainable development of the area. This report should be read in conjunction with the plans, drawings and documentation submitted as part of this planning pack and with that previously permitted under Reg. Ref. LRD6057/24-S3A and Reg. Ref. WEBLRD6103/26-S3.

2.0 SITE LOCATION AND DESCRIPTION

The subject site is located to the east side of Prussia Street (Nos. 23-28) opposite the junction with St. Joseph's Road. The site is a skewed rectangle in shape, which extends to approximately 0.38 hectares and fronts onto Prussia Street. It is bound to the north by No. 29 Prussia Street (a Protected Structure) and a car repair centre, and by residential dwellings to the south. The TU Dublin Grangegorman Campus is adjacent the subject site to the east, with the stone boundary wall of the campus forming the east (rear) boundary of the site.



Figure 1. Aerial Photograph of the Application Site (Subject lands approx. outlined in red)

The application site currently comprises an active construction site, with works associated with the parent permission well underway. Blocks A and B are partly constructed, while foundation works for

Block C are currently underway. Given the advanced stage of construction and the ongoing implementation of the parent permission, the proposed amendments and modifications to Block C at this stage are considered consistent with the established construction timeline, phasing strategy and the overall design vision for the site. The *figures* below illustrate the status of the site as of July 2026 and demonstrate the extent of construction activity underway at this time.

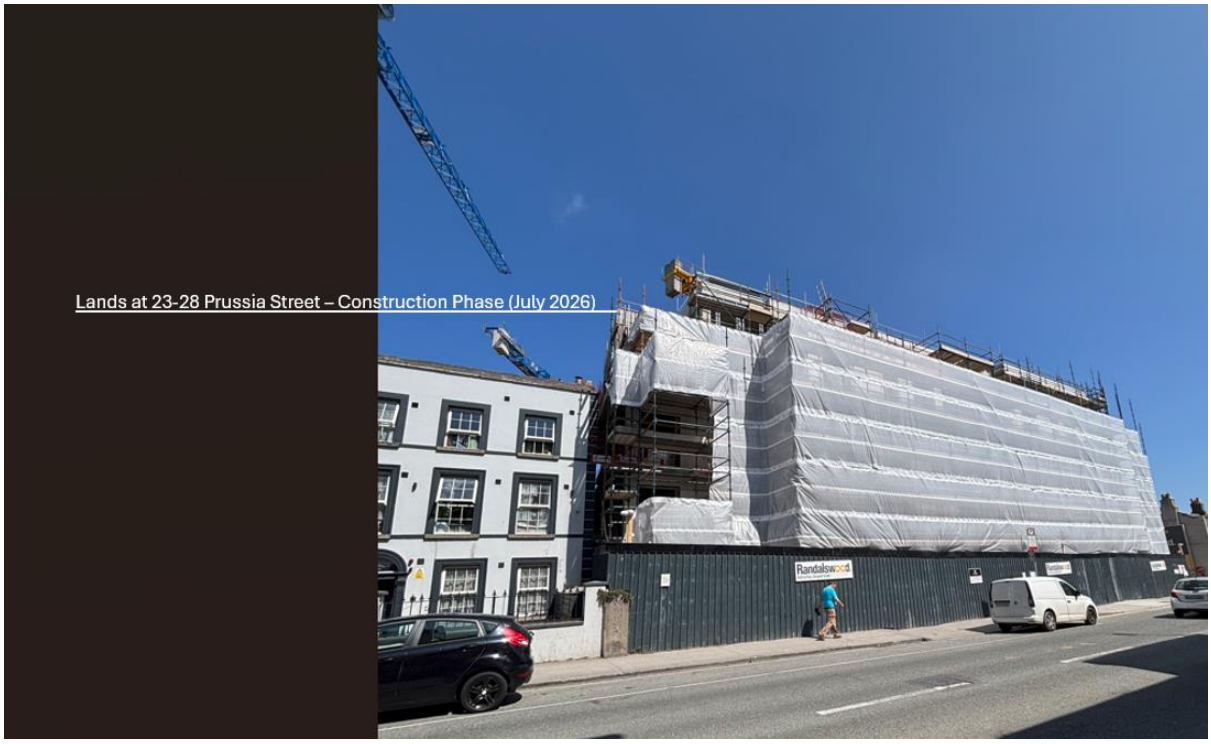

Figure 2. Site Visit of the construction phase at Prussia Street



Figure 3. Site Visit of the construction phase at Prussia Street – Block A, Block B and Block C

This site is strategically positioned within an area of the city centre that is well connected, enjoys excellent access to the road network, and will see significant re-development in the coming years (including the 'Blanchardstown to City Centre CBC' and mobility measures aiming to provide a safer cycle infrastructure and to encourage more sustainable travel modes, i.e., cycling, walking). There are permitted developments in the vicinity of the subject site (mainly student accommodation) which also promote pedestrian and cycling connectivity throughout the area, some of which are now under construction.

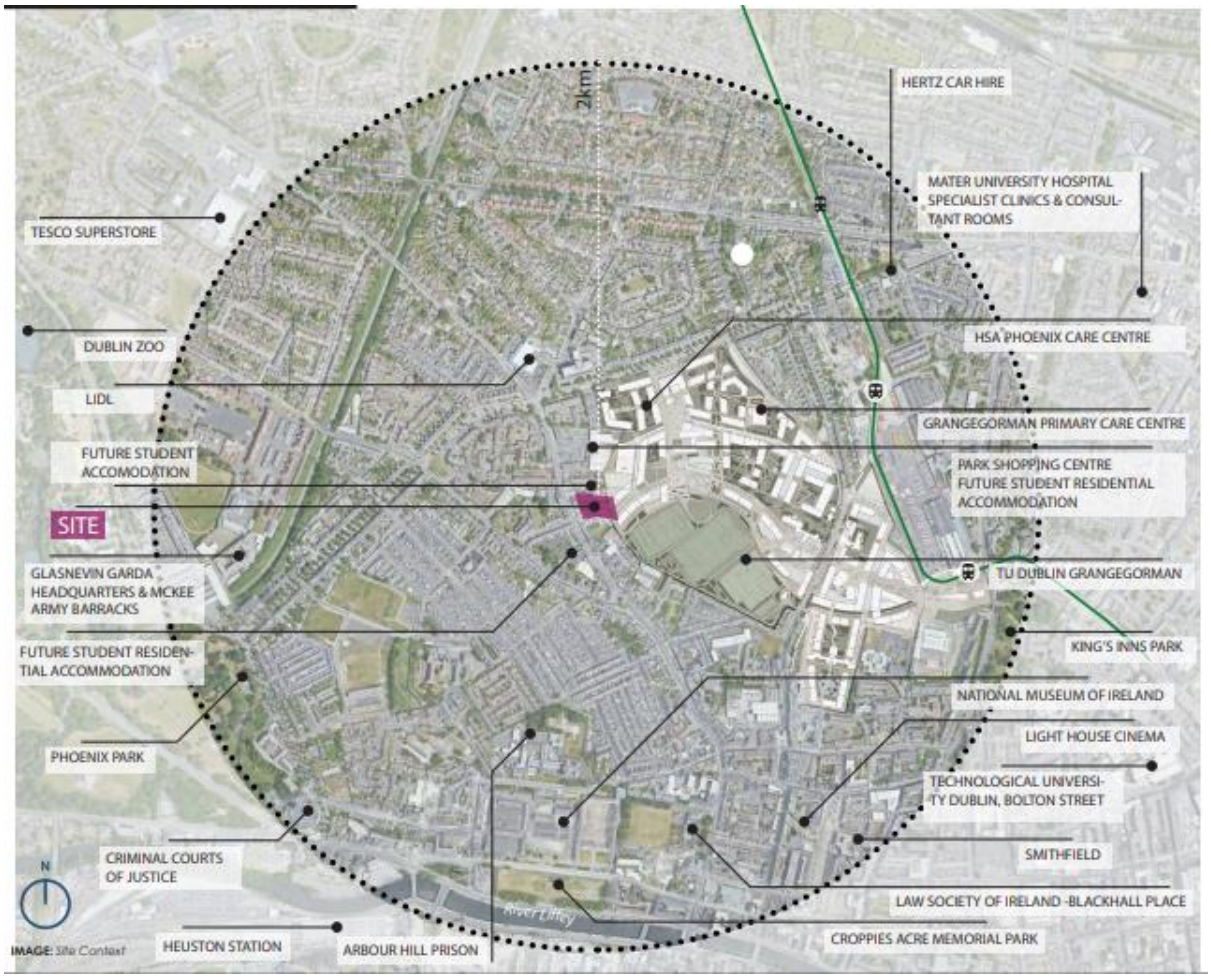

Figure 4. Overview of the amenities within the surrounding area of the subject lands

The previous wider surrounding area consisted of primarily low-rise residential in nature with some local commercial and retail uses. Further car repair and maintenance businesses are situated to the north of the application site, with recently constructed residential buildings located opposite the site to the west side of the street, and residential and commercial buildings, some of which are of Georgian character, fronting Prussia Street to the south.

The emerging context of this Inner-City area is that of higher rise and higher density development in line with National policy. The re-development of the Park Shopping Centre including the provision of student accommodation has been permitted by An Bord Pleanála (now An Coimisiún Pleanála), which has been detailed within the Planning History of this report. The student accommodation development is also under construction to the immediate north of the site which further outlines the emerging context of high-density development within the area.

The TU Dublin Grangegorman Campus is undergoing significant development, with several new buildings already constructed and others permitted and due to commence. This campus provides readily available services to the area, including employment, educational, commercial and community facilities, including large areas of open space in the vicinity of the site. As part of the TU Dublin Grangegorman Campus development, a Grangegorman campus gateway/public plaza area is to be developed linking the campus to Prussia Street. This proposal forms part of the overall permitted scheme on the application site.

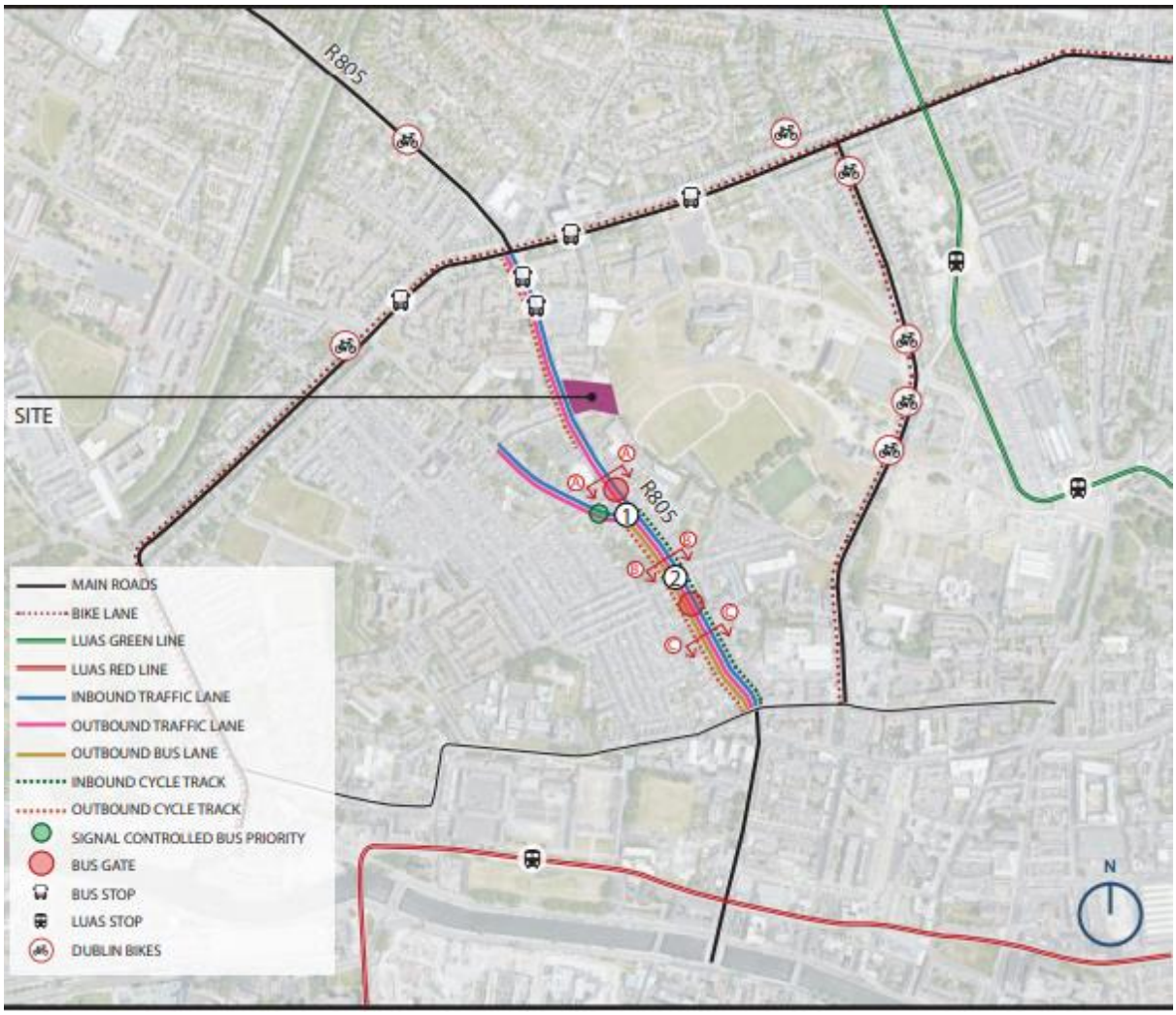

Figure 5. Overview of transport links with the subject lands

In light of the above, it is evident that the subject site is well served by a wide range of existing social, educational, employment and community facilities and is well located in terms of proximity to large retail centres and existing high-quality public transport. This level of infrastructure is considered sufficient to support the additional units now proposed and indeed the injection of population as a result of the permitted development will help sustain the long-term viability of this social infrastructure.

3.0 PLANNING HISTORY

DOWNEY have carried out an examination of the planning history of the subject site which determined that there have been a number of planning applications made on the subject lands. The most relevant planning history is as follows:

Subject Site:

Reg. Ref. GSDZ4210/24: By order dated 6th August 2025, Dublin City Council granted planning permission for a temporary haul route road. This was a concurrent application with Reg. Ref. 4211/24 below.

Reg. Ref. 4211/24: By order dated 10th September 2025, Dublin City Council granted planning permission for a temporary haul route road.

Reg. Ref. LRD6057/24-S3A: By Order dated 9th April 2025, Dublin City Council granted planning permission for development on site for 102 no. apartments (49 no. 1 beds, 48 no. 2 beds, 4 no. 3 beds, and 1 no. 4 bed) in 3 no. blocks, with a café/restaurant unit.

This acts as the parent permission for development on site

Reg. Ref. WEBLRD6103/26-S3: By Order dated 27th April 2026, an amendment to the above permitted development was granted to now provide 110 no. units (68 no. 1 beds, 39 no. 2 beds, 2 no. 3 beds, and 1 no. 4 bed) in 3 no. blocks. This amendment was provided through a revised unit mix set out within Block B and Block C, following the publication of the Planning Design Standards for New Apartments, 2025.

For further details on planning history for the subject site and the surrounding area, we respectfully refer Dublin City Council to planning permission Reg. Ref. to LRD6057/24-S3A Planning Statement which provides a comprehensive overview for development in the area.

4.0 PRE PLANNING CONSULTATION

A formal Section 247 Pre-Application Consultation with the Planning Authority required under the Planning and Development Act (As Amended 2000) took place on the 7th of July 2026 via Microsoft Teams with representatives of Dublin City Council.

Diarmuid Murphy facilitated the meeting on behalf of Dublin City Council's Planning Department, with Mary Hutchin and John Carty also in attendance from Dublin City Council. Those in attendance on behalf of the applicant included Mary McGrath and Simon Corrigan on behalf of McGrath Group, Denis Spriggs on behalf of Randalswood Construction Ltd., Alex Daly on behalf of Lohan & Donnelly Consulting Engineers, Brian Dennison, Des O'Donnell and Andrea Capurro on behalf of C+W O'Brien Architects, and Eva Bridgeman, Stephen Mahony and Sophie Hurley on behalf of DOWNEY (planning consultants).

This consultation meeting aided in informing the design of the proposed development now being intended to be lodged as a planning application to Dublin City Council. The main items discussed were as follows:

- The addition of 2 no. storeys in Block C, providing 10 additional units
- Alterations to the apartment numbers, mix and layout of permitted Block C only;
- Minor alterations to onsite bicycle parking / refuse / parking to reflect increased unit numbers;
- Minor alterations to the elevations to reflect the internal floor plate and apartment numbers and mix alterations (Block C).

DOWNEY wish to confirm to Dublin City Council, that under this subject amendment application, no amendments are being sought for any ope arrangements/elevations of Block A, Block B, or Block C from ground floor to 6th storey. The subject application is seeking permission for reconfigurations to the 7th storey, and the addition of 2 no. new storeys in Block C, as per the statutory planning notices and as per the supporting assessments and drawings submitted with this application. The proposed development is also seeking permission for additional bicycle parking spaces, however no additional bin storage area is required, and the additional capacity can be accommodated through more frequent bin collections.

Following the conclusion of the Pre-Planning Consultation, Dublin City Council, determined that the proposed amendments to the permitted development did not constitute any further consultation under Section 247 in relation to the proposed development and was based on the plans and particulars received by the Planning Authority on 9th June 2026, and as discussed in the Section 247 meeting on 7th July 2026.

Following this meeting, the applicant engaged with Dublin City Council to request a Section 247 (7) (a) and (b) of the Planning and Development Act, 2000 (as amended) which given the minor nature of these modifications determines that no further pre-planning consultation is required under Section 247 of the Planning and Development Act 2000 (as amended). The determination was issued, with a letter from Dublin City Council dated 29th July 2026, which states:

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

This determination letter is submitted under separate cover.

5.0 PART V ENGAGEMENT

Prior to the lodgment of the parent permission on site (Reg. Ref. LRD6057/24-S3A), the applicant began consultation with Dublin City Council with regards to Part V allocation for the subject development. This engagement has continued upon the receipt of the grant of permission and the course of construction, to agree on a formal Part V allocation for the subject development.

With the subject application now seeking permission for an additional 10 no. units (additional 18 no. units from the parent permission since amended to 110 no. units), the applicant has re-engaged with Dublin City Council to ensure an appropriate provision is provided. A Part V Validation letter from Dublin City Council is now being submitted in support of this application, together with the necessary Part V drawing and associated indicative costings.

6.0 DEVELOPMENT DESCRIPTION

The project is described, as per the planning application statutory notices, as the following:

> *"We, Randalswood Construction Ltd., intend to apply for permission for development on lands at 23-28 Prussia Street, Dublin 7 (D07 X9X6, D07 FW30 & D07 PAF1), (located at the junction of Prussia Street and St. Joseph's Road, and bounded by No. 29 Prussia Street (Protected Structure) to the north, No. 22 Prussia Street to the south, and TU Dublin, Grangegorman Campus and boundary wall (Protected Structure) to the east). The development will consist of proposed modifications to the previously permitted Large-scale Residential Development (LRD) (permitted under planning permissions Reg. Ref. LRD6057/24-S3A and amended under Reg. Ref. WEBLRD6103/26-S3), including the provision of 10 no. additional apartment units (110 no. permitted units to now provide a total of 120 no. apartment units i.e. a total of 74 no. 1 beds, 43 no. 2 beds, 2 no. 3 beds, and 1 no. 4 bed) as follows: Modifications to Block C from a total of 53 no. permitted apartments comprising of 34 no. 1 beds and 19 no. 2 beds, in a permitted building ranging from 7-8 storeys in height, to now provide two additional storeys to this block, to provide for a total of 63 no. apartments comprising of 40 no. 1-beds and 23 no. 2-beds, with modifications to the unit mix of the permitted seventh floor, in a building now ranging from 7-10 storeys in height, and all apartments provided with private balconies/terraces to south, east and west elevations; 16 no. additional cycle parking spaces to now provide a total of 240 no. cycle parking spaces on site including spaces at undercroft, surface and on Prussia Street, and all associated site works necessary to facilitate the development. The application may also be inspected online at the following website set up by the applicant: www.prussiastreetrevisions2lrd.ie"*

It is considered that the proposed modifications to the permitted scheme will continue to be beneficial for Prussia Street, the TU Dublin Grangegorman Campus and the surrounding environs, and the site represents an ideal location for residential development which enjoys the provision of a wide range of services, employment opportunities and is adjacent to a third level campus within this inner urban area.

A breakdown of the key characteristics of the proposed development is as follows:

Table 1: Breakdown of the key characteristics of the proposed development

SUMMARY OF KEY CHARACTERISTICS		
NO. OF APARTMENT UNITS (i.e. proposed modifications to Block C only, with Block A and Block B remaining as permitted)	1 BEDROOM UNITS	74
	2 BEDROOM UNITS	43
	3 BEDROOM UNITS	2
	4 BEDROOM UNITS	1
TOTAL NO. OF APARTMENT UNITS		120 (110 permitted, 10 additional now proposed)
TOTAL NO. OF BEDROOMS		170
TOTAL DEVELOPMENT GROSS INTERNAL FLOOR AREA (m^2)		9,018

TOTAL RESIDENTIAL NET FLOOR AREA (m²)	7152
TOTAL SITE AREA (HECTARES)	0.38
BUILDING FOOTPRINT ON GF (m²)	1,652
DEVELOPMENT SITE COVERAGE	43%
DENSITY (UNITS PER HECTARE)	316
DEVELOPMENT PLOT RATIO	2.4
TOTAL COMMUNAL OPEN SPACE AREA (m²)	800
% OF OPEN SPACE (m²)	21%
TOTAL CAR PARKING SPACES PROVIDED	0
TOTAL BICYCLE SPACES	240
TOTAL NO. OF SINGLE ASPECT UNITS	64
% NO. OF SINGLE ASPECT UNITS	53%
TOTAL NO. OF DUAL ASPECT UNITS	56
% NO. OF DUAL ASPECT UNITS	47%
APARTMENTS BUILDING HEIGHT	5 to 10 storeys (Blocks A, B & C)

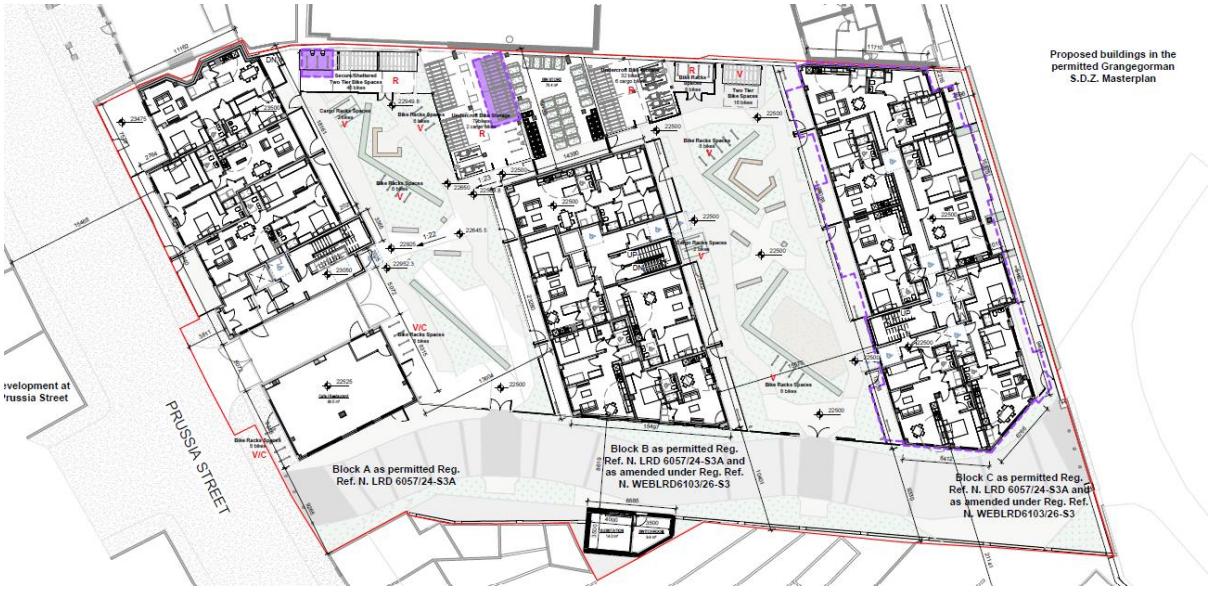

Figure 6: Extract of Proposed Site Layout Plan

6.1 Elevations

The layout of the permitted scheme has been developed as a result of the collaborative work of the design team. The permitted design breaks the scheme into three key elements. Each of the three main sections is of a different height. The height gradually increases from west to east, in recognition of the physical transition of built context of both Prussia Street and the Grangegorman campus. The first main section of the building facing Prussia Street is primarily 3-to-5 storeys, the middle element is

permitted as 4-to-6 storeys with 7-8 storeys along the eastern boundary, fronting onto the Grangegorman Campus. The most easterly building, Block C, will change with regards to the height of the structure, with the addition of 2 no. storeys, Floor 8 and Floor 9 under the subject application. These additional storeys follow the same structural and elevational pattern of the previously permitted Block C, but will now contain 10 additional residential units, bringing the total units from 110 to 120 units across the whole site.



Figure 6: Permitted (left) and proposed (right) Block C South Elevation

The proposed increased height therefore faces onto the large green open space of TU Dublin Grangegorman Camps providing an active frontage to this area and aligning with the completed, ongoing and envisioned development across the campus. The materials used are also reflective of the existing and permitted materials within the surrounding area. Dublin City Council are also invited to refer to the CGIs and Photomontages prepared by Digital Dimensions which outlines the 'permitted' and 'proposed' development, as well as its context with the surrounding development under construction which is of similar increased height.

6.2 Unit Mix

Under the Parent Application (Ref. LRD6057/24-S3, permission was granted for a total of 102 no. units on site, including 49 no. 1-beds, 48 no. 2-beds, 4 no. 3-beds, and 1 no. 4-bed units. Following the grant of this permission the '*Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025)*' were published. As such, under Reg. Ref. WEBLRD6103/26-S3, permission was granted for modifications to the parent permission and its unit mix, which provided for a total of 110 no. units, set out within the same building footprint. The unit mix permitted provided for 68 no. 1-beds, 39 no. 2-beds, 2 no. 3-beds, and 1 no. 4-bed.

Under the subject application, the applicant is now seeking permission for modifications to the unit mix of Level 07, as well as the addition of 2 no. new storeys. The proposed development is seeking permission for a total of 120 no. units, including 74 no. 1-beds, 43 no. 2-beds, 2 no. 3-beds, and 1 no.

4-bed). All units have been designed in accordance with the criteria set out within the *Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025)* and exceed the minimum standards.

It is not envisioned that there will be any adverse impacts on the amenities of existing or future residents as the proposed apartment number and mix complies with the applicable guidelines and standards for apartment living. The revised apartment mix and number will meet the criteria of the guidelines through mix ratio, internal space standards, dual aspect ratio and floor to ceiling height. We invite the Planning Authority to refer to the Housing Quality Assessment (HQA) and Schedule of Accommodation (SOA), as well as the floor plan drawings prepared by C + W O'Brien Architects, submitted under separate cover of this application for further information in this regard.

6.3 Density

The permitted scheme granted under planning permission Reg. Ref. LRD6057/24-S3A, and as amended by Reg. Ref. WEBLRD6103/26-S3, had a density of 292 units per hectare. The proposed modification to the permitted scheme at Prussia Street, as previously mentioned, seeks the provision of 10 no. additional units within Block C, to provide a total of 120 no. units. The provision of the additional units therefore has increased the density from 292, to 316 units/ha.

While it is acknowledged that this is above the net requirement under the density ranges for Dublin and Cork City and Suburbs City – Centre, it is also noted that Section 3.3.6 of the Sustainable and Compact Settlement Guidelines allows for increased densities where the opportunity for densities and building heights that are greater than prevailing densities and building height is identified in a relevant statutory plan. The design and form of the additional floors and thus the additional units will be designed and constructed as per the permitted and amended permissions in accordance with Dublin City Council's granting of the scheme. All apartment units within the proposed development have been provided with adequately sized balconies or patios and terraces which have been designed in accordance with quantitative and qualitative standards, and which have been provided with appropriate treatments to ensure privacy and security. Please refer to the enclosed Schedule of Accommodation prepared by C + W O'Brien Architects which sets out the private and semi-communal open space provided within each block.

To ensure that the development has had an appropriate response to its surrounding setting, an updated Daylight and Sunlight Analysis was conducted by Digital Dimensions which was completed based on the revised additional 2 no. floors, 10 no. additional apartments and the apartment mix and internal layout of the development, and this is submitted under separate cover of this application.

It is also noted that given the site's location and surrounding context, it is capable of accommodating increased densities. A Community & Social Infrastructure Audit has been prepared by DOWNEY and submitted under separate cover which confirms there are sufficient amenities within the surrounding area to accommodate the future residents. Further to this, owing to the site's proximity to Dublin City Centre, and that it adjoins TU Dublin Grangegorman campus, the site is within walking and cycling distance of key educational and employment area for future residents. The development on site is a zero-car development given the range of public transport services within the area. As such, the development site can easily be defined as an area with 'high-frequency' and 'accessible' from public

transport, while also being located in proximity to educational and employment facilities, and thus can accommodate increased density proposal.

DOWNEY, on behalf of the applicant, therefore respectfully request that Dublin City Council grant permission for the additional 10 no. units proposed under the subject application.

6.4 Conservation

DOWNEY note that the subject site location is bounded by No. 29 Prussia Street (Protected Structure) to the north, and TU Dublin, Grangegorman Campus and boundary wall (Protected Structure) to the east. In the first instance, it is noted that the subject application relates only to Block C of the permitted application (Reg. Ref. LRD6057/24-S3A and amended under Reg. Ref. WEBLRD6103/26-S3), which is situated in a removed location from the Protected Structure along Prussia Street. As such it is submitted that the subject application should not have any negative impact on this structure, and this was a matter discussed with Dublin City Council during pre-planning consultation stage of this application.

Notwithstanding this, Mesh Conservation Architects had assessed the development potential on the subject site and prepared a Heritage Impact Assessment to support the parent permission on site (Reg. Ref. LRD6057/24-S3A) as well as an Opinion Letter in support of the most recently permitted modifications (Reg. Ref. WEBLRD6103/26-S3). Within the decision of said permission, Dublin City Council were content with the information provided by Mesh Conservation Architects and granted permission subject to conditions. Upon receipt of this decision, the applicant has commenced construction on site. As such, it is considered that the proposed development under the subject application, to provide an additional 2-storeys on Block C, in a removed location from the Protected Structure on Prussia Street, is considered to be acceptable. For ease, the Heritage Impact Assessment previously prepared in support of the parent permission has been resubmitted under separate cover of the subject application which Dublin City Council are invited to refer to.

7.0 PLANNING CONTEXT

DOWNEY have prepared a separate Statement of Consistency with Planning Policy assessment that depicts how the proposal accords with planning policy from a national to regional level, and we invite the Planning Authority to refer to Part B of this document for a full comprehensive list of national, regional and local level policies and how the proposal accords with the proper planning and sustainable development of the area.

In this regard however, it is noted that the subject site is primarily zoned 'Objective Z1 – Sustainable Residential Neighbourhoods' with a small section of the site (southwestern corner) zoned 'Objective Z2 – Residential Neighbourhoods (Conservation Areas)'. As such, the addition of 10 no. units to a development previously permitted under Reg. Ref. LRD6057/24-S3A, as amended under Reg. Ref. WEBLRD6103/26-S3 is considered acceptable within this zoning.

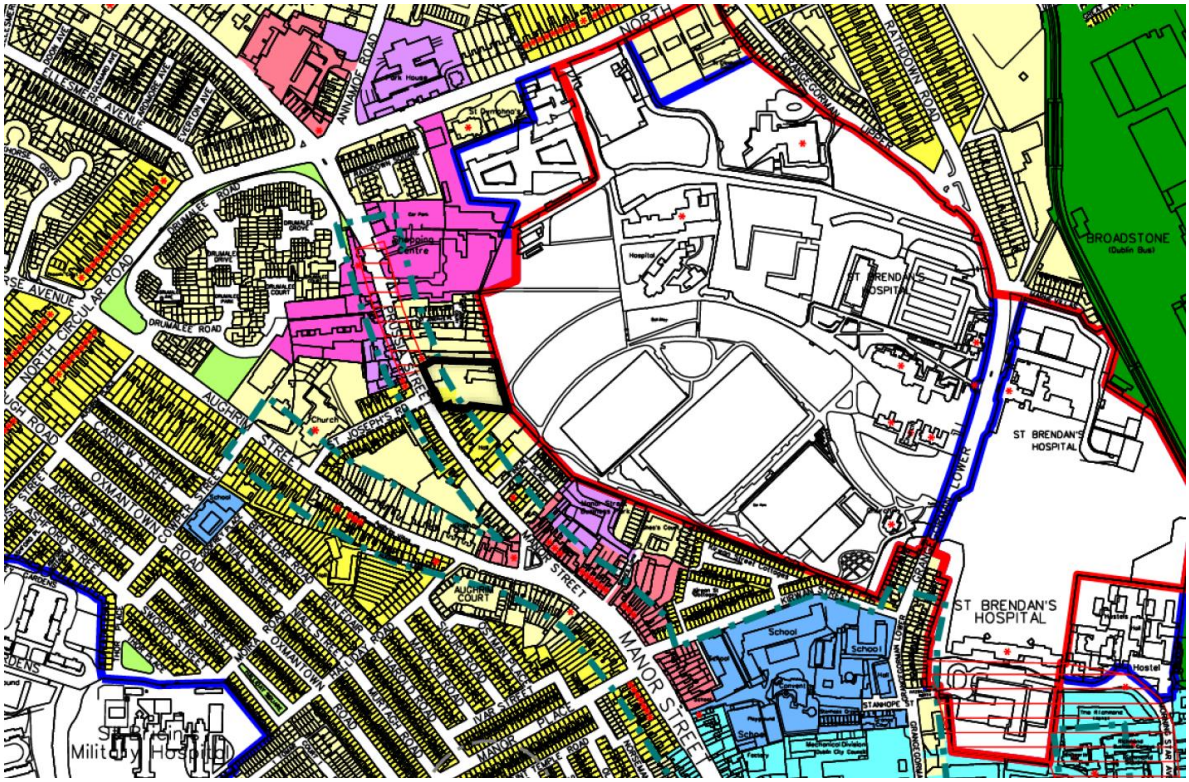

Figure 7. Land Use Zoning Map, site location outlined in black.

8.0 INFRASTRUCTURE AUDITS

Under the parent permission for development, Reg. Ref. LRD6057/24-S3A, DOWNEY had prepared a Social & Community Infrastructure Audit and Childcare Infrastructure Audit, which was deemed acceptable by Dublin City Council. Within this application, 102 no. residential units and a café were granted permission. Under Reg. Ref. WEBLRD6103/26-S3, permission was granted for modifications to the parent permission, which provided an increase in units in Block B and Block C, providing a total of 110 units (increase of 8 no. units) and a café. This increase was provided through a change in the unit mix of the permitted development, including an increase 1-bedroom units, and a decrease in 2- and 3-bedroom units.

The subject application is now seeking permission for an amendment to the permitted development, which will provide a total of 120 no. units on site and a café. The increase in units is being facilitated in Block C only, through the change in unit mix of the permitted 7th storey, and the provision of an additional 2-storeys. A detailed breakdown of the unit mix of the parent permission, permitted amendment, and proposed development is provided in Table 2 below, which also calculates the total persons that can be accommodated in the future development:

Table 2. Breakdown of Unit Mix of Development on site

Unit Type	Parent Permission Reg. Ref. LRD6057/24-S3A	Amended Permission Reg. Ref. WEBLRD6103/26-S3	Proposed Development
1-bed	49	68	74
2-bed	48	39	43
3-bed	4	2	2

4-bed	1	1	1
Total Units	**102**	**110**	**120**
Total Persons	**312**	**301**	**327**

As such, while the subject application is seeking permission for an additional 18 no. units from what was previously assessed under the parent permission Reg. Ref. LRD6057/24-S3A, it is only providing for an increase of 15 no. persons, based on the unit mix of the development. It can therefore be considered that the findings of the previous assessments remain valid. Nonetheless, an updated assessment has been undertaken to accompany this application which is submitted under separate cover of this application.

With regards to the provision of childcare infrastructure, the subject application is not seeking the provision of any creche within the application. Neither the parent permission (Reg. Ref. LRD6057/24-S3A) nor the amendment application (Reg. Ref. WEBLRD6103/26-S3) provided for any creche facility which was accepted by Dublin City Council.

For housing schemes, the Childcare Facilities: Guidelines for Planning Authorities (2001), provide a benchmark provision of 1 no. 20 space childcare facility per 75 dwellings. It is worth noting that as stated within the apartment guidelines, *"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".* As such, the proposed development will provide a total of only 46 no. units, not counting the 1-bedroom units. It is therefore considered that there is no such demand or requirement to provide any childcare facility within the subject application.

Dublin City Council are invited to refer to the updated Community & Social Infrastructure Audit prepared by DOWNEY and submitted under separate cover for further details in this regard.

9.0 CONCLUSION

This Planning Statement has been prepared by DOWNEY to accompany a planning application for proposed modifications to a previously permitted Large-scale Residential Development (LRD) granted under planning permission Reg. Ref. LRD6057/24-S3A, and as amended by Reg. Ref. WEBLRD6103/26-S3, on lands at nos. 23 - 28 Prussia Street, Dublin 7.

The applicant is committed to delivering a high-quality development at Prussia Street, with a diverse range of residential unit types, complemented by facilities for the enjoyment of residents that comply with National Guidelines and exhibit proper planning. For further details on the design approach for the scheme, please refer to the architectural drawings and Architectural/Urban Design Statement, which accompany this application.

It is considered that the proposed alterations to that previously permitted is a continued opportunity to deliver housing at this strategic location, adjacent to high-quality public transport and a wide range of existing social, community and physical infrastructure, which will help meet the ever-increasing

demand for residential accommodation in the Greater Dublin Area. The proposed revisions will remain deliverable in the short term such as that previously permitted.

DOWNEY, on behalf of the applicant, Randalswood Construction Ltd., therefore request that Dublin City Council grant permission for the proposed development.

PART B – STATEMENT OF CONSISTENCY

1.0 INTRODUCTION

DOWNEY, Chartered Town Planners, 29 Merrion Square, Dublin 2, D02 RW64, have prepared this Statement of Consistency with Planning Policy, on behalf of our client and the applicant, Randalswood Construction Ltd. This statement accompanies a planning application for proposed modifications to that previously permitted for a Large-scale Residential Development (LRD) on lands at 23-28 Prussia Street, Dublin 7.

The project is described, as per the planning application statutory notices, as follows:

> *"We, Randalswood Construction Ltd., intend to apply for permission for development on lands at 23-28 Prussia Street, Dublin 7 (D07 X9X6, D07 FW30 & D07 PAF1), (located at the junction of Prussia Street and St. Joseph's Road, and bounded by No. 29 Prussia Street (Protected Structure) to the north, No. 22 Prussia Street to the south, and TU Dublin, Grangegorman Campus and boundary wall (Protected Structure) to the east). The development will consist of proposed modifications to the previously permitted Large-scale Residential Development (LRD) (permitted under planning permissions Reg. Ref. LRD6057/24-S3A and amended under Reg. Ref. WEBLRD6103/26-S3), including the provision of 10 no. additional apartment units (110 no. permitted units to now provide a total of 120 no. apartment units i.e. a total of 74 no. 1 beds, 43 no. 2 beds, 2 no. 3 beds, and 1 no. 4 bed) as follows: Modifications to Block C from a total of 53 no. permitted apartments comprising of 34 no. 1 beds and 19 no. 2 beds, in a permitted building ranging from 7-8 storeys in height, to now provide two additional storeys to this block, to provide for a total of 63 no. apartments comprising of 40 no. 1-beds and 23 no. 2-beds, with modifications to the unit mix of the permitted seventh floor, in a building now ranging from 7-10 storeys in height, and all apartments provided with private balconies/terraces to south, east and west elevations; 16 no. additional cycle parking spaces to now provide a total of 240 no. cycle parking spaces on site including spaces at undercroft, surface and on Prussia Street, and all associated site works necessary to facilitate the development. The application may also be inspected online at the following website set up by the applicant: www.prussiastreetrevisions2lrd.ie"*

This Statement of Consistency with Planning Policy has been prepared in accordance with the requirements of the Planning and Development Act and associated Regulations (as amended).

This Statement demonstrates that the proposed development is consistent with the relevant national, regional and local planning policy and guidelines issued under Section 28 of the Planning and Development Act, 2000 (as amended). This Statement should be read in conjunction with the accompanying detailed documentation prepared by the design team.

For details of compliance with the quantitative standards for residential units of adopted '*Sustainable Urban Housing: Design Standards for New Apartments (2025)*', '*Quality Housing for Sustainable Communities Best Practice Guidelines for Delivering Homes Sustaining Communities*' and the *Dublin City Development Plan 2022 - 2028*, please refer to the Housing Quality Assessment and Schedule of

Accommodation prepared by C + W O'Brien Architects which is included as part of the architectural drawing pack.

2.0 NATIONAL POLICY AND GUIDELINES

The key provisions of the national planning policy, including Section 28 Guidelines, as it relates to the proposed development are now set out in the following sections. The key national policy and guidance documents of relevance include:

- Project Ireland 2040: National Planning Framework, First Revision (2025)
- Project Ireland 2040: National Development Plan 2021-2030
- Delivering Homes, Building Communities 2025-2030
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)
- Planning Design Standards for Apartments, Guidelines for Planning Authorities (July 2025)
- Urban Development and Building Heights: Guidelines for Planning Authorities (December 2018)
- Childcare Facilities: Guidelines for Planning Authorities (2001)
- Smarter Travel: A Sustainable Transport Future
- Design Manual for Urban Roads and Streets (DMURS)
- Cycle Design Manual (September 2023)
- EIA Directive
- Birds and Habitats Directive – Appropriate Assessment
- The Planning System and Flood Risk Guidelines (2009)

2.1 Project Ireland 2040: National Planning Framework First Revisions (2025)

The National Planning Framework (NPF) is *"the Governments high-level strategic plan for shaping the future growth and development of our country out to the year 2040."* It is a Framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment- from our villages to our cities and everything in between. It is stated within the NPF that *"people in Ireland have a strong connection with rural areas for a number of different reasons. For some, it is the place in which they have chosen to live and work, where the land not only provides a home, but also provides an income."*

The NPF outlines a number of strategies and policy objectives, emphasising upon the issue of compact growth and urban consolidation. Specifically in terms of '*compact growth'*, the NPF targets for up to 40% of all new future housing developments to be within and close to the existing footprint of built-up areas. It seeks to make use of under-utilised land and buildings, including infill, brownfield, publicly owned, vacant sites and that of under-occupied buildings.

The National Strategic Outcome 1 of Compact Growth pursues a compact growth policy at national, regional and local level to provide for greater residential development within the existing built-up areas of Irelands cities, towns and villages, providing for housing variety and sustainable development. The mechanisms employed to achieve this National Strategic Outcome aim to achieve some of the following within urban areas:

- Enable urban infill development that would not otherwise occur;
- Improve 'liveability' and quality of life, enabling greater densities of development to be achieved;
- Ensure transition to more sustainable modes of travel (walking, cycling, public transport) and energy consumption (efficiency, renewables) within an urban context;

The proposed additional 10 units to now provide 120 apartment units, subject to this application, will result in much needed infill development, providing a high quality and considered design of urban infill apartments. The apartments ensure transition to sustainable modes of transport with the provisions of bicycle parking only due to the central city location within Dublin. The subject site is located within a connectivity area for public transport with access to the Dublin Bus System, the Red Luas Line and Dublin Hueston Station, providing access to Irish Rail. The proposed development is an expressive example of appropriate infill development, good design and proper planning; the development further contributes to much needed housing within the Dublin area.

The NPF explicitly supports the densification of vacant sites, such as the subject site and those similar, this is outlined by ***National Policy Objective 45***, which states:

> *"Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increasing building heights".*

The NPF contains a number of National Policy Objectives (NPOs) which are relevant to this planning submission. These NPOs are the following:

> ***National Policy Objective 4:*** *A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.*
>
> ***National Policy Objective 7:*** *Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.*
>
> ***National Policy Objective 8:*** *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 and ensure compact and sequential patterns of growth.*
>
> ***National Policy Objective 12:*** *Ensure 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 20:*** *In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.*
>
> ***National Policy Objective 42:*** *To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.*
>
> ***National Policy Objective 43:*** *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:*** *Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development.*

It is considered that planning permission for the proposed residential development of 10 additional units providing a total of 120 no. apartments is consistent with the National Planning Framework (First Revisions) National Policy Objectives, as outlined above. The proposed development will contribute to the delivery of new housing being located within existing footprint of existing settlements and will contribute to housing built within Dublin as one of the five cities. The design of the development is responsive to the immediate urban context, ensuring its character, size and scale is appropriate of the existing environment while still being an example of standalone architecture that is representative of modern needs and requirements including its examples of sustainable development at an appropriate scale. The proposed development will result in more central city living and allow for access to the surrounding city centre amenities and jobs access that Dublin City provides. The proposed development is an appropriate example of infill residential development and will respond to the needs of increased density within existing settlements.

The proposed modifications would offer the expedited construction of a greater number of dwellings within the Prussia Street Apartment Development to address the acute shortage of residential accommodation, help to address the rise of homelessness and help to address the rising cost of rental accommodation, apartment and housing affordability within Ireland addressing the key concerns as outlined in national policy.

DOWNEY is of the considered opinion that the proposed development has demonstrated and clearly aligns with the National Planning Framework (First Revisions) 2025, where it is an example of proper planning and sustainable development. The utilisation of the subject site for infill housing will contribute to greater environmental, social and economic outcomes, provide needed housing for the population of Dublin and make a positive contribution to the urban character of the city.

2.2 Project Ireland 2040: National Development Plan 2021-2030

Project Ireland 2040 National Planning Framework (NPF), which sets the overarching spatial strategy for the next twenty years, includes the National Development Plan, which sets out the ten-year investment strategy. The recent Review of the NDP was led by the National Investment Office in the Department of Public Expenditure and Reform and was structured in two phases with associated outputs. The review was founded upon a strongly evidence-based approach, building upon the extensive data and analyses that have been produced by the NIO and by the work of IGEES and other policy units across other Government Departments and agencies, including other newly commissioned and targeted research. The NDP sets out funding to underpin key Government priorities. Specifically, allocations will support the realisation of critical goals laid out in Housing for All and will enable a step-change in investment to ameliorate the effects of climate change.

Outlined in the NDP, the key achievements of NPF over 2018-2021 and in relation to housing includes delivery of over 63,000 homes and 26,256 new social housing homes. To underpin NPF population targets, a detailed assessment of structural housing demand identifies demand for almost 400,000 new homes in Ireland between 2020 and 2031, or 33,000 new homes per annum. At city and county

level, this is broken down to form a Housing Supply Target (HST) for each local authority area, to guide planning for future development.

The NPF housing supply target has been refined to reflect recent (2020) ESRI research based on NPF population growth, taking into account both existing demand and a legacy of undersupply to date. There is now a need to accommodate around 600,000 new households by 2040, with the Department of Housing planning to deliver an average of 33,000 homes per annum to 2030 including an average of 10,000 new social homes each year and an average of 6,000 affordable homes each year.

Set out in the NDP, public capital investment must, as a top priority, support the delivery and location of the homes that society will need over the next decade and beyond, while also ensuring that in the future the pattern of housing development underpins the development of more compact higher-density cities, towns and other areas. It is also a priority to enable infill development, with up to 50% of future housing in our cities and major urban centres and 30% elsewhere to be provided within existing built-up areas serviced by existing facilities and along high-capacity public transport corridors.

The proposed development will provide high density, sustainable residential development in close proximity to a high frequency bus network, LUAS line, and cycling infrastructure, all of which promotes compact urban growth and a good quality of life. Prussia Street is located between the Grangegorman and Stoneybatter areas of Dublin City, these have become attractive and vibrant areas for people to live and work in, supported by high-quality physical and social infrastructure as well as vast recreational amenities and the various sports clubs and centres within the area.

2.3 Delivering Homes, Building Communities 2025-2030

Published on 13th November 2025, the Government has introduced a new housing plan to replace Housing for All. The new plan "Delivering Homes, Building Communities", aims to speed up the delivery of new homes and tackle homelessness, building on the progress of the Housing for All plan. The Plan aims to deliver 300,000 new homes by the end of 2030, which includes 72,000 social homes and 90,000 affordable housing supports. The Plan is also backed by an unprecedented investment in water, energy, and transport infrastructure to assist in the delivery of these houses, with a total of €9 billion capital funding for housing in 2026 alone.

The Plan is based on two key pillars:

1. Activating the supply of 300,000 more homes; and
2. Supporting people to have a home of their own.

Pillar 1 will be achieved through *"activating more land, providing more housing-related infrastructure, securing more development finance for home building, addressing viability challenges particularly those seen in apartment delivery, increasing the adoption of Modern Methods of Construction, increasing the skills in the residential construction sector and working toward ending dereliction and vacancy."*

The Plan also identifies four key priorities to activate Pillar 1, which are as below:

1. Ensure a strong pipeline of zoned and serviced land is available.
2. Create the conditions to attract the required investment.

3. Increase skills and support the adoption of Modern Methods of Construction in the residential construction sector.
4. Work toward ending dereliction and vacancy.

With regards to Pillar 2, the Plan details how *"Government will support people. It sets out a series of key actions that work towards ending homelessness, support affordability and address the housing needs of people as they progress through life. In partnership with local authorities, the LDA and AHBs, the Plan will address the needs of the most vulnerable in our communities, make buying and renting homes more affordable and support the development of villages, towns and cities across the country."*

The four key priorities to activate Pillar 2, are as follows:

1. Focus on ending homelessness, deliver homes for older people and support social inclusion.
2. Deliver an average of 12,000 new social homes every year over the lifetime of the Plan.
3. Promote affordable homeownership, protect renters and make buying and renting homes more affordable.
4. Invest in the built environment of towns, villages and cities across the country to enhance community well-being.

The Plan concludes noting that in order to achieve the objective set out, a *"joined-up, long-term national effort"* is required, noting that it is a shared responsibility to deliver on these targets.

The proposed development will continue to provide high density, sustainable residential development in close proximity to a high frequency bus network, LUAS line, and cycling infrastructure, all of which promotes compact urban growth and a good quality of life. Prussia Street is located between the Grangegorman and Stoneybatter areas of Dublin City, these have become attractive and vibrant areas for people to live and work in, supported by high-quality physical and social infrastructure as well as vast recreational amenities and the various sports clubs and centres within the area.

DOWNEY are of the considered opinion that the proposed modifications as a part of the development scheme at Prussia Street will contribute to the Government's targets through the construction of the 120 no. apartment units on the subject site. The construction of apartments is an essential part of housing infrastructure within Ireland and will contribute to residential housing options and availability. The provisions of the 120 residential units will be of an appropriate mix of unit types and sizes; all located within the designated Z1 – Sustainable Residential Neighbourhood zoning and within a small section of the site (southwestern corner) zoned Z2 – Residential Neighbourhoods (Conservation Areas) under the Dublin City Development Plan. It is submitted that the development is consistent with the current policy for Delivering Homes, Building Communities 2025-2030.

2.4 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

Adopted in January 2024, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, outlines national planning policies focuses on sustainable residential growth and development of compact settlements in both urban and rural areas. These guidelines, which replace the 2009 Sustainable Residential Development in Urban Areas Guidelines, have been updated to reflect current government policies and broader economic, social and

environmental considerations. They align with the NPF First Revisions and provide detailed guidance on settlement growth priorities, residential density, urban design and placemaking. Additionally, the guidelines introduced flexible development standards to support a wider range of housing options tailored to the specific context of various settlement sizes, from cities to smaller towns and villages.

The Sustainable Residential Development and Compact Settlement Guidelines set out policy and guidance in relation to planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements. They build on and update previous guidance to take account of current government policy and economic, social and environmental considerations.

The aim of the Guidelines is to set out the key planning principles which should be reflected in Development Plans and local area plans, and which should guide the preparation and assessment of planning applications for residential developments in urban areas. These Guidelines support higher residential densities particularly for sites within town centre locations and along public transport corridors, as it states: "*To achieve compact growth, it will also be necessary to increase the scale of new buildings in all parts of our cities and towns, with highest densities at the most central and accessible urban locations, particularly in city centres and close to public transport nodes and interchanges*."

Development standards in the Guidelines are covered by SPPRs as follows in 3:

Table 3: SPPR's For Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024)

Specific Planning Policy Requirements	Assessment
SPPR 1: Separation Distances	**In compliance.** A separation distance of 16.35m is achieved between Block B and Block C with opposing windows. No changes are proposed for Block A and the Café/Retail. No changes to the Block placement are proposed to that previously granted under LRD6057/24-S3A and separation distances will remain unchanged.
SPPR 2 - Minimum Private Open Space Standards for Houses	**In Compliance.** Meets or exceeds private amenity space standards under the Planning and Design Standards for Apartments, Guidelines for Planning Authorities (2025). We respectfully invite Dublin City Council to review the drawings and HQA prepared by C + W O'Brien Architects.
SPPR 3 - Car Parking It is a specific planning policy requirement of these Guidelines	**N/A** No carparking permitted under that previously granted LRD6057/24-S3A.

	No carparking is proposed as part of this amendment to Permitted Residential Development application.
SPPR 4 - Cycle Parking and Storage	**In compliance.** 240 bicycle parking spaces are proposed as part of this application in the form of standard Sheffield spaces, and cargo bicycle spaces throughout the site.

The design of the proposed development has placed considerable emphasis on the context of the site and location as well as the surrounding built environment. The proposed development successfully incorporates the criteria of the '*Urban Design Manual – A Best Practice Guide*' and remains unchanged from that previously permitted under LRD6057/24-S3A.

With regards to densities, Table 3.1 of the guidelines set out the following requirements for areas in which the subject site of Prussia Street would fall under:

Table 3.1 - Areas and Density Ranges Dublin and Cork City and Suburbs

City - Centre The city centres of Dublin and Cork, comprising the city core and immediately surrounding neighbourhoods[6], 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.
City - Urban Neighbourhoods The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations[7], (iii) town centres designated in a statutory development plan, and (iv) lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.
City - Suburban/Urban Extension Suburban areas are the lower density car-orientated residential suburbs constructed at the edge of cities in the latter half of the 20th and early 21st century, while urban extension refers to the greenfield lands at the edge of the existing built up footprint that are zoned for residential or mixed-use (including residential) development[8]. It is a policy and objective of these Guidelines that residential densities in the range 40 dph to 80 dph (net) shall generally be applied at suburban and urban extension locations in Dublin and Cork, and that densities of up to 150 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8).

Table 3.1 of the Guidelines sets out the areas and density ranges for Dublin as well as Cork City and its suburbs. The subject site would be located within the '*City – Centre*' category, which states:

> "*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 this regard, the permitted scheme on site, granted under planning permission Reg. Ref. LRD6057/24-S3A, and as amended by Reg. Ref. WEBLRD6103/26-S3, had a density of 292 units per hectare. The proposed modification to the permitted scheme at Prussia Street, as previously mentioned, seeks the provision of 10 no. additional units within Block C, to provide a total of 120 no. units. The provision of the additional units therefore has increased the density from 292, to 316 units per hectare. In this regard, it is noted that under 'Exceptions' Section 3.3.6 of the Guidelines, it states:

"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."

As set out within this application, and the previous permissions on site (Reg. Ref. LRD6057/24-S3A, as amended by Reg. Ref. WEBLRD6103/26-S3), the subject site is capable of accommodating increased height and density, given the surrounding context of the area, including the recent permissions along Prussia Street and the ever-growing development in TU Dublin Grangegorman. The increased height is being strategically placed in Block C, as the block furthest away from Prussia Street, and backing onto a large green open space associated with TU Dublin Grangegorman. As such there will be no foreseen issues of overlooking or loss of privacy given the surrounding development.

To ensure that the development has had an appropriate response to its surrounding setting, an updated Daylight and Sunlight Analysis was conducted by Digital Dimensions which was completed based on the revised additional 2 no. floors, 10 no. additional apartments and the apartment mix and internal layout of the development, this is submitted under separate cover of this application.

It is also noted that given the site's location and surrounding context, it is capable of accommodating increased densities. A Community & Social Infrastructure Audit has been prepared by DOWNEY and submitted under separate cover which confirms there are sufficient amenities within the surrounding area to accommodate the future residents. Further to this, owing to the site's proximity to Dublin City Centre, and that it adjoins TU Dublin Grangegorman campus, the site is within walking and cycling distance of key educational and employment area for future residents. The development on site is a zero-car development given the range of public transport services within the area. As such, the development site can easily be defined as an area with 'high-frequency' and 'accessible' from public transport, while also being located in proximity to educational and employment facilities, and thus can accommodate increased density proposal.

DOWNEY are of the considered opinion that the proposed development represents a development that has been carefully and appropriately designed, considering its neighbouring properties and will continue to integrate successfully with its environs. The alterations to the apartment mix now proposed will continue to integrate successfully with the surrounding environs and provide for additional needed housing to a high standard within a well-connected area. The SPPR's have continued to be complied with and result in an example of proper planning.

It is submitted that the proposed modifications would be a positive addition to the surrounding built environment of Prussia Street and to the locality. Furthermore, it is considered that the proposed buildings will meet the aspirations of a range of people and the design and layout of such allows easy access by all. For further information on the proposed development's consistency with the '*Urban Design Manual*', please refer to that previously permitted under Reg. Ref. LRD6057/24-S3A and the revised drawings completed by C + W O'Brien Architects submitted under separate cover of this application.

2.5 Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025)

Adopted in July 2025, the Planning Design Standards for Apartments Guidelines for Planning Authorities (2025), outlines national planning policies in relation to the design of apartment developments. These guidelines, which replace the 2018 Sustainable Urban Housing: Design Standards for New Apartments, which have been updated to reflect current government policies and broader economic, social and environmental considerations. They align with the NPF and provide detailed guidance on apartment mix, internal space standards, dual aspect ratios, floor to ceiling heights, apartment to stair/lift core ratio, storage spaces and amenity spaces. Additionally, the guidelines set out policy and guidance in relation to the planning and development of apartments in all housing or mixed-use developments that include apartments that may be available or for individual lease, or for rental purposes.

The Guidelines outline policies relating to:

- *Apartment Mix;*
- *Internal space standards for different types of apartments;*
- *Dual aspect ratios;*
- *Apartments to stair/lift core ratios;*
- *Storage spaces; and*
- *Amenity spaces including balconies/patios.*

The Guidelines these Guidelines apply to all housing or mixed-use developments that include apartments that may be made available for sale, whether for owner occupation or for individual lease, or for rental purposes.

The guidelines set out 8 SPPR's to assist in the delivery of new developments, the SPPR's have been outlined and assessed below in Table 4.

Table 4: Compliance with Specific Planning Policy Requirements

Specific Planning Policy Requirement	***Compliance***
SPPR1 ***(Housing Mix)***	In Compliance. Internal floor area has been redesigned to comply with SPPR 1 unit mix providing a range of 1- and 2-bed units within Block C
SPPR2 ***(Apartment Floor Areas)***	In Compliance.

	Apartment floor areas have been redesigned to satisfy SPPR 2 as per the HQA prepared by CW O'Brien Architects and submitted under separate cover.
SPPR3 ***(Dual Aspect Ratios)***	In Compliance. Development in compliance with standards of SPPR 3 with 47% of the units dual aspect.
SPPR4 ***(Floor to Ceiling Heights)***	In Compliance. No change from previously permitted.
SPPR5 ***(Stair and Lift Cores)***	In Compliance. No change from previously permitted.
SPPR6 ***(Communal, Community and Cultural Facilities)***	In Compliance. No change from previously permitted.
SPPR 7 ***(Shared Accommodation/Co-Living Developments)***	N/A. Not relevant to the development.
SPPR 8 ***(Purposed Built Student Accommodation)***	*N/A. Not relevant to the development.*

DOWNEY are of the considered opinion that the proposed development complies with the SPPRs requirements of the 'Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025)'. This planning application includes a Housing Quality Assessment and a detailed daylight, sunlight, and internal light analysis report, in accordance with the Guidelines. The proposed development will help to meet the current demand for apartment type developments.

For further information in this regard, please refer to the enclosed architectural drawings and detailed Housing Quality Assessment prepared by C + W O'Brien Architects which provides confirmation that the proposed development is consistent with the design standards of these Guidelines.

2.6 Urban Development and Building Height Guidelines for Planning Authorities

The 'Urban Development and Building Heights, Guidelines for Planning Authorities' are intended to set out national planning policy guidelines on building heights in relation to urban areas, building from the strategic policy framework set out in the National Planning Framework 2040 (NPF). This document recognises that in recent years local authorities, through the statutory plan processes, have begun to set generic maximum height limits. However, such limits if inflexibility and unreasonably applied, can undermine national policy objectives to provide more compact urban forms as outlined in the National Planning Framework and instead can continue unsustainable patterns of development.

These Guidelines reinforce that, "a key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels."

The document states that it is critically important that Development Plans identify and provide policy support for specific geographic locations or precincts where increased building height is not only

desirable but a fundamental policy requirement. Locations with the potential for comprehensive urban development or redevelopment should be identified where, for example, a cluster of higher buildings can be accommodated as a new neighbourhood or urban district or precinct.

Section 1.10 of the Guidelines state *"the rationale […] for consolidation and densification in meeting our accommodation needs into the future must also be applied in relation to locations that Development Plans and local area plans would regard as city and town centre areas". It continues, "in such areas, it would be appropriate to support the consideration of building heights of at least 6 storeys at street level as the default objective, subject to keeping open the scope to consider even greater building heights by the application of the objectives and criteria laid out in Sections 2 and 3 of these guidelines, for example on suitably configured sites, where there are particular concentrations of enabling infrastructure to cater for such development, e.g. very significant public transport capacity and connectivity, and the architectural, urban design and public realm outcomes would be of very high quality."*

Section 1.11 states "these guidelines therefore set out national planning policy that:

- *Expand on the requirements of the National Planning Framework; and*
- *Applies those requirements in setting out relevant planning criteria for considering increased building height in various locations but principally (a) urban and city-centre locations and (b) suburban and wider town locations."*

The proposed development at Prussia Street is consistent with these objectives and with the physical and social infrastructure already in place and a height of 3-8 storeys already permitted under Reg. Ref. LRD6057/24-S3A and amended under Reg. Ref. WEBLRD6103/26-S3. The subject application is seeking permission for an additional 2-storeys in Block C, which will be located across the green open space associated with TU Dublin Grangegorman campus, and more importantly located away from Prussia Street to ensure minimal impact is provided.

The following Special Planning Policy Requirements are contained within the Guidelines and are relevant to the proposed development:

> ***Specific Planning Policy Requirement 1*** *– "In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height."*

The proposed development at Prussia Street is situated at a strategic location within the inner core of Dublin City and is in close proximity of high frequency public transport and is capable of supporting taller buildings and increased density. The lands are well served by public transport (bus and LUAS), as well as cycling infrastructure, and as such are suitable for increased height and density.

Specific Planning Policy Requirement 2 *– "In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office, commercial, appropriate retail provision and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities."*

The proposed development seeks to provide for a residential scheme that is surrounded by a mix of uses. In the immediate vicinity of the subject site, Prussia Street and Manor Street offer a wide range of retail convenience shops, post office, restaurants and cafés incorporating the 15-minute city concept. This is in conjunction with the existing retail, community and commercial facilities within the area and the City Centre, these include shopping centres, cultural and community centres, sports clubs, parks, playgrounds, etc. A Community and Social Infrastructure Audit prepared by DOWNEY is enclosed with this planning application and provides an overview and assessment of existing infrastructure and facilities within the Grangegorman area and surrounding environ that ensures compliance with the aforementioned specific planning policy.

Specific Planning Policy Requirement 3 *– "It is a specific planning policy requirement that where;*

(A) 1. An applicant for planning permission sets out how a development proposal complies with the criteria above, and

2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;

Then the planning authority may approve such development, even where specific objectives of the relevant Development Plan or local area plan may indicate otherwise."

It is submitted that this LRD planning application contains sufficient reports, documentation, plans and justification to support the proposed development and outlines how the development is in accordance with the relevant planning policies and guidelines pertaining to the area. Such documents include architectural plans and elevations, Architectural/Urban Design Statement, DMURS statements, Traffic Assessment, AA Screening, planning reports, engineering reports and daylight and shadow analysis. With permission already granted for an 8-storey block under Reg. Ref. LRD6057/24-S3A, it is considered that the provision of an additional 2 no. storeys in Block C will provide a satisfactory increase and completion of the overall development.

Specific Planning Policy Requirement 4 *– "It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:*

1. The minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act, 2000 (as amended), titled

"Sustainable Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines;

2. A greater mix of building heights and typologies in planning for the future development of suburban locations; and

3. Avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more."

The permitted scheme on site (Reg. Ref. LRD6057/24-S3A and amended under Reg. Ref. WEBLRD6103/26-S3) provided for 110 no. apartment units within 3 no. blocks that ranges in height from 3-8 storeys and with a density of 292 units per hectare. The subject application is seeking permission for an increase of 10 no. units, and an additional 2-storeys in Block C only, to now provide a total of 120 no. units in 3- 10-storey height apartment buildings. This results in a proposed density of 316 units per hectare, and as set out in Section 6 of Part A, and Section 2.4 of Part B of this report, it is considered that given the site's location and proximity to Dublin City Centre that this is considered acceptable. Additionally, the proposed scheme provides for a mix of unit types and layouts, thus ensuring an appropriate variety of design and typology.

In light of the above, it is considered that the proposed development is consistent with the requirements of these guidelines on building heights for urban developments and that greater heights are achievable. The proposed development steps in height from 3-10 storeys with cognisance given to existing residential dwellings and the provision of appropriate separation distances, as well as the permitted developments in the area. The existing lands were essentially brownfield lands that are zoned for residential development and are serviced with road and public transport infrastructure, with construction now underway. Therefore, high density residential development can be achieved on the lands in accordance with the aforementioned policy guidelines.

2.7 Childcare Facilities: Guidelines for Planning Authorities (2001)

Government policy on childcare is to increase the number of childcare places and facilities available and to improve the quality of childcare services for the community. These Guidelines for Planning Authorities on Childcare Facilities provide a framework to guide both local authorities in preparing Development Plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals.

The following definition of Childcare is included in the Guidelines:

"In these Guidelines, "childcare" is taken to mean full day-care and sessional facilities and services for pre-school children and school-going children out of school hours. It includes services involving care, education, and socialisation opportunities for children. Thus services such as pre-schools, naíonraí (Irish language playgroups), day-care services, crèches, playgroups, and after-school groups are encompassed by these Guidelines. Conversely childminding, schools, (primary, secondary and special) and residential centres for children are not covered by these Guidelines."

For housing schemes, the Guidelines provide a benchmark provision of 1 no. 20 space childcare facility per 75 dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The recommendations provided within the Guidelines must be considered in the context of the 'Sustainable Urban Housing: Design Standards for New Apartments' (Dec. 2022), which state that:

> *"Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area."*

As recommended in the Guidelines, 1 no. childcare facility may be required as part of the proposal to cater for the influx of population arising from the proposed scheme. It is worth noting that as stated within the apartment guidelines, "*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*". Under the parent permission Reg. Ref. LRD6057/24-S3A as amended by Reg. Ref. WEBLRD6103/26-S3, permission was granted for 110 no. units without a creche. As such, no crèche is proposed under the subject application. It is also submitted that as per the Guidelines, excluding 1 no. bedroom units, the proposed development comprises a total of 46 no. units which could be potentially family-occupied, which is well below the threshold of 75 no. units. Dublin City Council are invited to refer to the childcare provision assessment, which is included in the Community & Social Infrastructure Audit, and submitted under separate cover for further details in this regard.

In light of the above, it is submitted that the current provision of childcare facilities in the area, as well as the nature of the proposed development in terms of its population target and with regards to the estimated demand generated by the proposed scheme, is consistent with the Childcare Facilities Guidelines.

2.8 Smarter Travel: A Sustainable Transport Future

In summary, 'Smarter Travel: A Sustainable Transport Future' states that, "to achieve the vision of a sustainable transport system, individual lifestyles will have to change and collectively we will have to work progressively on a range of solutions which deal with apparently conflicting goals: economic growth, reduced emissions, less use of motorised transport and better accessibility."

The five key goals of this transport policy are as follows:

> • *Improve quality of life and accessibility to transport for all and, in particular, for people with reduced mobility and those who may experience isolation due to lack of transport.*
>
> • *Improve economic competitiveness through maximising the efficiency of the transport system and alleviating congestion and infrastructural bottlenecks.*

- *Minimise the negative impacts of transport on the local and global environment through reducing localised air pollutants and greenhouse gas emissions.*
- *Reduce overall travel demand and commuting distances travelled by the private car.*
- *Improve security of energy supply by reducing dependency on imported fossil fuels.*

It is considered that the proposed development complies with 'Smarter Travel: A Sustainable Transport Future'. The subject site is strategically located within less than 200 metres walking distance of Dublin Bus services and the proposed BusConnects transport corridor, i.e., Blanchardstown to City Centre. The proposed development provides housing within Dublin City and in close proximity to a number of Dublin Bus services and LUAS stops which will promote a modal shift to sustainable transportation. The proposed development also provides considerable secure, covered bicycle parking for future residents to again encourage use of sustainable modes of transportation. Therefore, it is considered that the proposed development is consistent with this national transport policy and will assist in its implementation.

2.9 Design Manual for Urban Roads and Streets (DMURS)

The Design Manual for Urban Roads and Streets (DMURS) 2013 and as updated in 2019, sets out design guidance and standards for constructing new and reconfigured existing urban roads and streets. It also sets out practical design measures to encourage more sustainable travel patterns in urban areas. The Transport drawings and documentation prepared by Lohan & Donnelly Consulting Engineers with the parent permission provide further details in respect of the compliance of the proposed development with the provision of DMURS and are enclosed as part of this LRD planning application.

2.10 Cycle Design Manual (September 2023)

The 'Cycle Design Manual' 2023 embraces the Principles of Sustainable Safety as this will offer a safe traffic environment for all road users including cyclists. It offers guidance on integrating the bike in the design of urban areas. The Manual challenges planners and engineers to incorporate cycling within transport networks more proactively than before in promoting sustainable forms of active transport.

Outlined in the Manual, many residential and access streets already offer a high quality of service to cycling. Cycling two-abreast on quiet, interesting, well-surfaced streets and roads can be attractive to cyclists. In many cases there is no physical infrastructure involved, other than the self-evident and self-enforcing nature of the environment.

It is submitted that the proposed development provides considerable secure, covered bicycle parking for future residents to encourage use of sustainable modes of transportation and this is in compliance with Section 4.17 of the Design Standard for New Apartments. Please refer to the enclosed Transport drawings and documentation prepared by Martin Rogers Consulting Ltd for further details in this regard.

2.11 EIA Directive

The EIA Directive 85/337 EEC, as amended, is the key legislation in EU Environmental Policy. The EIA Directive aims to determine the likely significant effects of a project on the environment. Screening is

the first stage in the EIA process required by Article 4 of the EIA Directive and this process determines whether an EIA is required for a specific project. The Directive outlines in Article 4(1) 24 Annex 1 projects that require a mandatory EIA. Article 4(2) outlines Annex 2 projects that require consideration for EIA further to a case by case examination or through thresholds and criteria set out by Member States. In an Irish context, projects requiring a mandatory EIA or consideration for EIA further to a case by case examination or thresholds are listed in Schedule 5 of the Planning and Development Regulations 2001 (as amended). The proposed development in this regard is sub-threshold.

Furthermore, having regard to Annex III of the EIA Directive 2014/52/EU and the guidance contained in the Department's Environmental Impact Assessment Guidance for Consent Authorities regarding Sub-Threshold Development (2018), and in particular:

- The size and design of the whole project;
- Cumulation with other existing and/or approved projects;
- The use of natural resources, in particular land, soil, water and biodiversity;
- The production of waste;
- Pollution and nuisances;
- The risk of major accidents and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge; and,
- The risks to human health (for example due to water contamination or air pollution).

It is considered that there will be no likely significant effects on the environment arising from the proposed development. Thus, having regard to the above, and in particular to the nature, scale, and location of the proposed project, by itself and in combination with other plans and projects, it is considered that an Environmental Impact Assessment is not required for this project. For further information in this regard, please refer to the EIA Screening Report prepared by Enviroguide / DNV Consulting which accompanied the parent permission on site (Reg. Ref. LRD6057/24-S3A), as well as the updated EIA Technical Note prepared by DNV to accompany the subject application.

3.0 REGIONAL POLICY AND GUIDELINES

The key provisions of the regional planning policy as it relates to the proposed development are now set out in the following sections. The key regional policy of relevance includes:

- Regional Spatial and Economic Strategy (Eastern & Midland Regional Assembly)

3.1 Regional Spatial and Economic Strategy for the Eastern & Midland Region

The Regional Spatial and Economic Strategy (RSES) was published by the Eastern and Midland Regional Assembly. The RSES outlines the long-term regional level strategic planning and economic framework in support of the National Planning Framework for the period 2019-2031. The RSES identifies regional assets, opportunities, pressures and constraints and provides a framework for investment to better manage spatial planning and economic development throughout the Eastern & Midland Region. The

RSES is tasked with the development of planning policy for future housing needs in the region upon consideration of the availability of land, resources, environment and infrastructure capacity.

In conjunction with the NPF, the RSES predicts *Dublin City and Suburbs* to experience continued population growth over the period 2019-2031 with a predicted increase of 220,000. The NPF targets 50% of all housing to be provided within or contiguous to the built-up area of Dublin city and suburbs. In order to combat and provide for compact residential development, the RSES outlines a number of key Regional Policy Objectives that pertain to the NPF targets. The key Regional Policy Objectives applicable to the development proposal are the following:

> **Regional Policy Objective (RPO) 4.3** – *"Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built-up area of Dublin city and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects."*

> **Regional Policy Objective (RPO) 5.3 –** *"Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists."*

The proposed development at Prussia Street is located on brownfield urban lands, now under construction, in an inner-city location which is highly accessible and provides for a high-density development in close proximity to a high frequency bus network, future BusConnects CBC, existing and planned cycling infrastructure. Therefore, it is considered that the proposed modifications to the development is consistent with the aforementioned objectives and will further support sustainable travel patterns.

> **Regional Policy Objective (RPO) 5.4 –** *"Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for New Apartments' Guidelines, and 'Urban Development and Building Heights Guidelines for Planning Authorities'."*

It is submitted that the provision of a high-quality and high-density development consisting of a total of 120 no. apartment units as proposed within this LRD planning application at Prussia Street will assist in achieving the aforementioned objective and it also complies with the pertaining policies and standards. For further details on how the proposed development is in accordance with this policy, please refer to the Housing Quality Assessment and Architectural/Urban Design Statement prepared by C + W O'Brien Architects which are included as part of the architectural planning packs.

> **Regional Policy Objective (RPO) 5.5 –** *"Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES.*

Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns."

The proposed scheme is located on existing zoned and serviced lands, adheres with the policies and objectives of the RSES for the Eastern & Midland Regional Assembly area and will provide a high-quality development which will further service and contribute to the re-development and consolidation of the area.

In relation to Settlement Strategies, Regional Policy Objectives (RPO) 4.1 and 4.2 of the RSES set out the rationale and basis for preparing these strategies. **RPO 4.1** states:

"In preparing Core Strategies for Development Plans, Local Authorities shall determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements in the RSES, within the population projections set out in the National Planning Framework to ensure that towns grow at a sustainable and appropriate level, by setting out a rationale for land proposed to be zoned for residential, employment and mixed-use development across the Region. Core strategies shall also be developed having regard to the infill/brownfield targets set out in the National Planning Framework, National Policy Objectives 3a-3c."

RPO 4.2 states:

"Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded."

It is submitted that the proposed development on existing zoned, serviced lands will adhere with the policies and objectives of the Regional Spatial and Economic Strategy for the Eastern & Midland Regional Assembly area and will contribute to providing additional housing units and employment opportunities within the existing envelop of Dublin City and Suburbs.

4.0 LOCAL POLICY AND GUIDELINES

4.1 DUBLIN CITY DEVELOPMENT PLAN 2022 – 2028

The Dublin City Development Plan 2022-2028 was adopted at a Special Council meeting on the 2nd of November 2022. The Plan came into effect on 14th of December 2022.

4.1.1 Zoning

Under the Dublin City Development Plan 2022 - 2028, the subject site is primarily zoned '*Objective Z1 – Sustainable Residential Neighbourhoods*' with a small section of the site (southwestern corner) zoned '*Objective Z2 – Residential Neighbourhoods (Conservation Areas)*'.

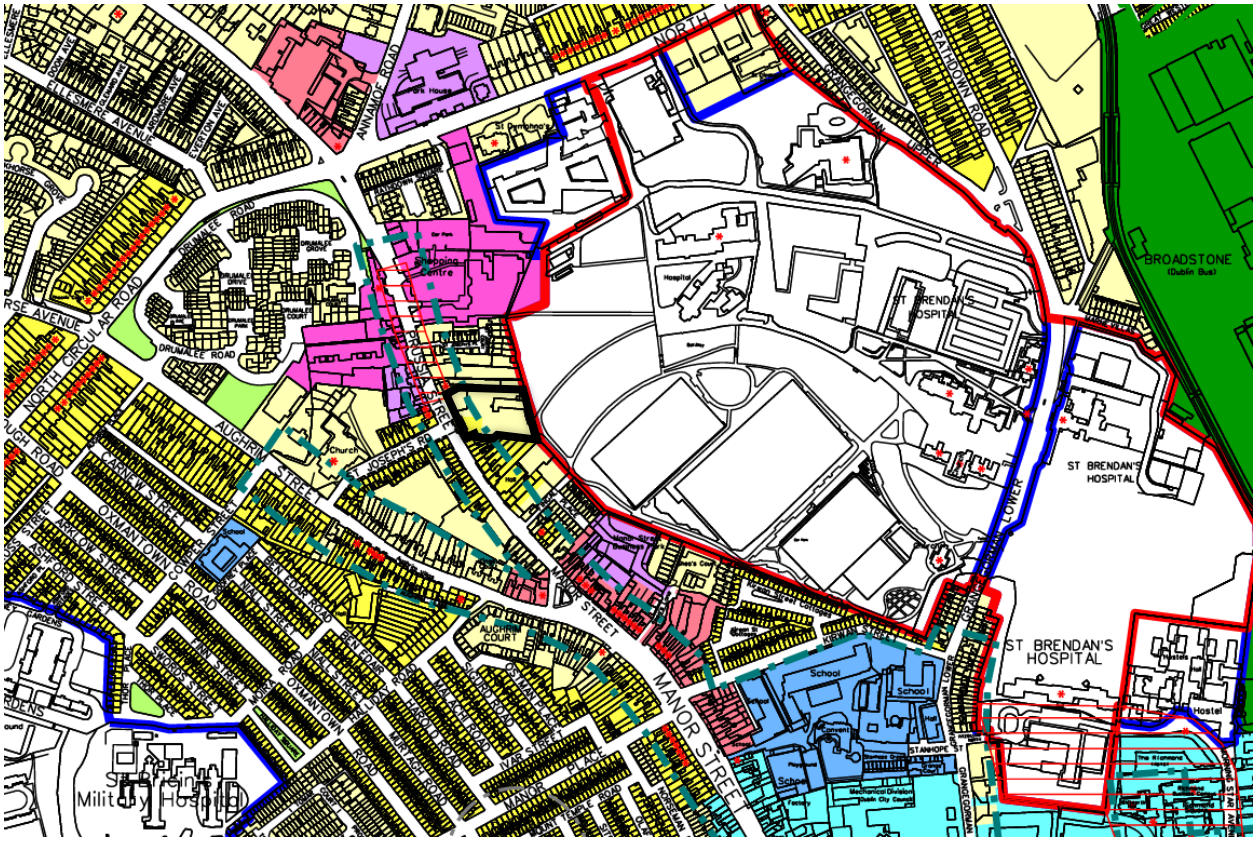

Figure 8: Land Use Zoning Map, site location outlined in black.

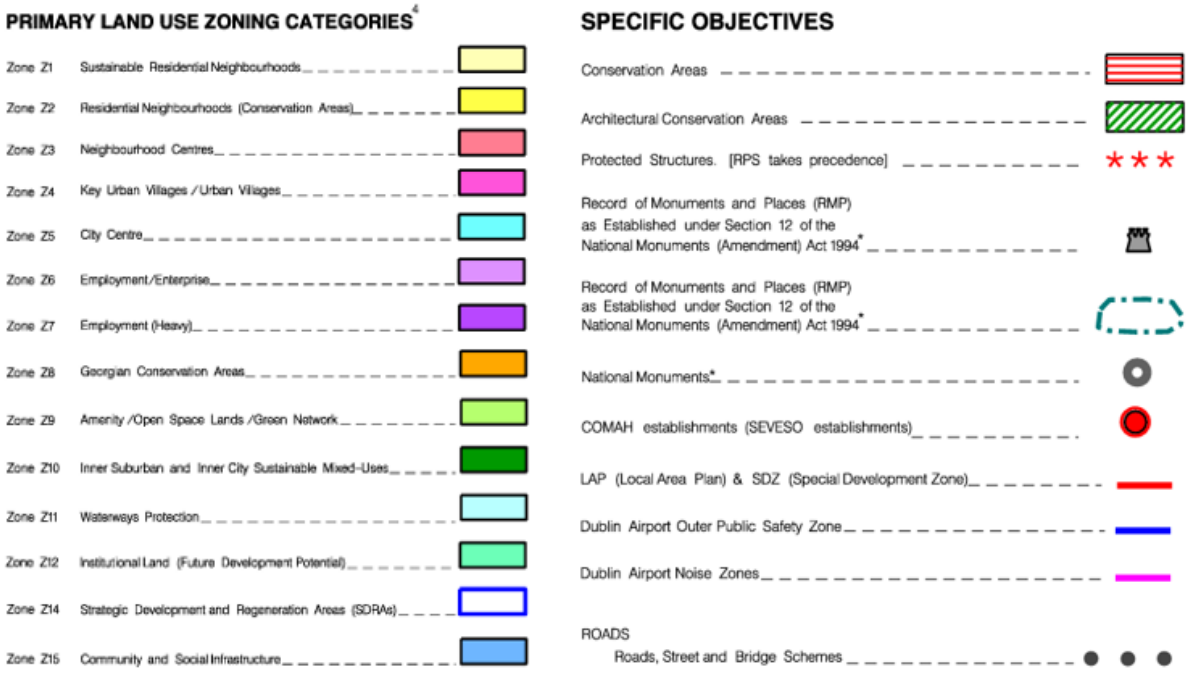

Figure 9: Land-use zoning objective legend key

The '*Objective Z1*' zoning seeks "*to protect, provide and improve residential amenities*", and the '*Objective Z2*' zoning seeks "*to protect and/or improve the amenities of residential conservation areas*."

As stated in the pertaining Development Plan in relation to '*Zoning Objective Z1*', the uses applicable to the subject lands are as follows:

Permitted in Principle
Buildings for the health, safety and welfare of the public, childcare facility, community facility, cultural/recreational building and uses, education, embassy residential, enterprise centre, halting site, homebased economic activity, medical and related consultants, open space, park-and-ride facility, place of public worship, public service installation, ***residential****, shop (local), training centre.*

Open for Consideration
Bed and breakfast, betting office, car park, civic and amenity/recycling centre, garden centre, golf course and clubhouse, hostel, hotel, industry (light), live/work units, media-associated uses, petrol station, pigeon lofts, public house, restaurant, veterinary surgery.

The uses applicable to the subject site under the '*Zoning Objective Z2*' are as follows:

Permitted in Principle
Buildings for the health, safety and welfare of the public, childcare facility, embassy residential, home-based economic activity, medical and related consultants, open space, public service installation, ***residential****.*

Open for Consideration
Bed and breakfast, community facility, cultural/ recreational building and uses, education, live-work units, place of public worship, restaurant, veterinary surgery.

The proposed modifications to the development is permitted in principle under both objectives, with a café/restaurant being open for consideration, and therefore is in accordance with the zoning objectives and the necessary social and physical infrastructure for the area; this remains unchanged from that previously permitted under permission LRD6057/24-S3A, as amended under Reg. Ref. WEBLRD6103/26-S3.

4.1.2 Core Strategy

The purpose of the Core Strategy is to *'guide spatial direction of future development and regeneration in the city in line with the principles of compact growth'* of the area of the Planning Authority and in doing so, to demonstrate that a Development Plan and its policies and objectives are entirely consistent with national and regional policies and strategies.

Regarding the population targets and calculated housing need, it is stated that '*the Development Plan must accommodate between 20,120 – 31,520 additional persons up to an overall population target of between 625,750 and 640,000 by 2028*.' Based on the housing capacity identified by Dublin City Council, there is a sufficient amount of land zoned for residential development to accommodate for the identified growth by 2028.

The Development Plan outlines that there is a total of 5,800ha of land zoned for residential or mixes uses, with '*approximately 550 hectares available to develop during this Development Plan cycle, which can provide approximately 49,175 residential units*.' Significant housing demand exists in the overall Dublin area.

In line with **Policy CSO7**, it is the Policy of Dublin City Council to:

> "*To promote the delivery of residential development and compact growth through active land management measures and a co-ordinated approach to developing appropriately zoned lands aligned with key public transport infrastructure, including the SDRAs, vacant sites and underutilised areas*."

The proposed modifications will continue to contribute to the provision of housing within Prussia Street, adjacent to the Grangegorman SDRA area, on a now under construction site. It will contribute to the core strategy of Dublin, in the provision of compact new residential units in the form of 120 no. apartments being proposed overall across Block A, Block B and Block C. The proposed development is therefore compliant with the core strategy of the Dublin City Development Plan 2022 – 2028.

4.1.3 Quality Residential Neighbourhoods

In terms of Quality Housing and Sustainable Neighbourhoods in Residential Developments, the Development Plan outlines the following polices:

> ***"QHSN17:** To promote sustainable neighbourhood developments which cater to the needs of persons in all stages of their lifecycle, e.g., children, people of working age, older people, people living with dementia and people with disabilities."*

> ***"QHSN36:** 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."*

It is submitted that the proposed amendments will continue to offer the existing benefits of the previously permitted development under LRD6057/24-S3A as amended under Reg. Ref. WEBLRD6103/26-S3. Inclusive of benefits from transportation, wide range of residential and social amenities within Dublin City, that the development will be an example of sustainable development, which continues to promote the 15-minute city concept. For further details on the revised apartment mix please refer to the Architectural Design Statement, prepared by C + W O'Brien Architects, submitted under separate cover of this application. Additionally, for further details on the development scheme in its entirety, we respectfully refer Dublin City Council to planning permission Reg. Ref. LRD6057/24-S3A.

4.1.4 SDRA 8 Grangegorman / Broadstone

Grangegorman is a strategic site that is situated in the city centre. On the 21st December 2010 the Government designated lands at Grangegorman as a strategic development zone (SDZ). It is the vision that this area will be intensified through supporting and meeting the needs of the Health Service Executive (HSE), Dublin Institute of Technology (DIT), the City, and surrounding communities.

The subject area, Prussia Street, falls within the Strategic Development Regeneration Area 8: Grangegorman/Broadstone. The Dublin City Development Plan 2022 - 2028 states the following in regard to their vision for future development of Prussia Street within the SDRA 8 area:

> *"Prussia Street is located on the western side of the SDRA linking Stoneybatter Village to North Circular Road. This key thoroughfare provides for significant strategic development opportunities through the regeneration of a number of vacant and underutilised sites for mixed use development. Future development in the area shall provide for a coherent and considered streetscape that respects the existing historic character whilst at the same time ensuring an appropriate scale and density is achieved in line with the 15-minute city objective."*

DOWNEY submit that the development's design has not changed significantly and that the modifications only consist of 2 no. additional floors and the revision of the 7th Floor in Block C to provide for 10 additional units, therefore the development in its entirety will continue to have cognisance with the overarching guidance of developments within SDRA 8. For further details on the development scheme in its entirety with respect to SDRA8, we respectfully refer Dublin City Council to Reg. Ref. LRD6057/24-S3A.

4.1.5 Compact Growth & Brownfield Development

Within the Dublin City Development Plan 2022-2028, there is a clear emphasis on compact growth within established urban areas. The following policies and objectives attest to the commitment of Dublin City Council to compact growth on city centre sites, but specifically sites in close proximity to public and active transport infrastructure and within SDRAs. The policies and objectives are as follows:

> **SC1 Consolidation of the Inner City**: "*To consolidate and enhance the inner city, promote compact growth and maximise opportunities provided by existing and proposed public transport by linking the critical mass of existing and emerging communities such as Docklands, Heuston Quarter, Grangegorman, Stoneybatter, Smithfield, the Liberties, the North East Inner City and the south and north Georgian cores with each other, and to other regeneration areas.*"
>
> **CSO7 Promote Delivery of Residential Development and Compact Growth:** "*To promote the delivery of residential development and compact growth through active land management measures and a co-ordinated approach to developing appropriately zoned lands aligned with key public transport infrastructure, including the SDRAs, vacant sites and underutilised areas*."

DOWNEY submit that the proposed amendments to the permitted development at Prussia Street, is in accordance with encouraging compact growth and brownfield development within an inner-city location. It will contribute to the regeneration of Prussia Street and contribute to the vision and goals of seeing consolidated brownfield regeneration development occur within the Grangegorman SDRA, including for Prussia Street.

4.1.6 Development Management

Chapter 15 of the Dublin City Development Plan sets out development standards and criteria that form the policies and objectives of the City Development Plan to ensure that development occurs in an

orderly and efficient manner and that it is in accordance with proper planning and sustainable development. The following section assesses the main set of standards and criteria required for high-quality, sustainable development:

The *Sustainable Urban Housing: Design Standards for New Apartments* under Section 28 of the Planning and Development Act 2000 (as amended) has subsequently been amended which sets out specific planning policy requirements for apartment development. These Section 28 guidelines should be references as part of any planning application for apartment developments. The revised *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities* were published in 2025.

Criteria	Development Plan Requirement
15.1 Introduction	
15.2 Planning Process and Documentation	
15.2.1 **Legislative Context**	*"Applicants are encouraged to consult the Development Plan and other guidelines set out herein to ascertain the requirements for development proposals. Part III of the Planning and Development Act 2000, as amended, sets out the legislative context for the control of development and the planning application process with reference to Part 4 of the Planning and Development Regulations 2001, as amended, in respect of the requirements for planning applications."* DOWNEY submit that the proposed development has had cognisance with the Development Plan and other relevant guidelines set out herein within the overarching planning policy. We invite the Planning Authority to refer to the *Statement of Consistency with Planning Policy* section of this report prepared by DOWNEY for further details in how the proposed development has had cognisance with national, regional and local level of policies that are in place to guide requirements for development proposals.
15.2.3 **Planning Application Documentation - Planning Thresholds**	"*Planning applications should be supported by the necessary analysis and documentation to demonstrate the proposed design and rational for a scheme. To assist in the planning application preparation, Table 15-1 sets out the development thresholds for some of the documentation related to specific planning applications.* *Please note Table 15.1 for the Thresholds for Planning Applications*." The design team has taken cognisance of Table 15.1 for the thresholds for the proposed modifications to the development scheme at Prussia Street and the designated thresholds for reports. Please refer to the *Schedule of the List of Documents, Maps, Plans and Drawings* submitted under cover of this planning application for proposed alterations to that previously permitted, which has had cognisance with the thresholds as outlined in Table 15.1 including all supporting assessments provided with the parent permission Reg. Ref. LRD6057/24-S3A.
15.2.4 **Interest in Property**	"*With regard to submitting a planning application, under the Planning and Development Regulations, 2001 (as amended), an applicant who is not the legal owner of the land or structure in question must submit a letter of consent from the owner in order to make the planning application*."

	The applicant is the legal owner of 23 – 28 Prussia Street. With appropriate consents also obtained from the Grangegorman Development Agency (GDA) regarding the previously permitted southern public plaza gateway route. DOWNEY submit that the planning application is therefore compliant with section 15.2.4 of the Development Plan.
15.2.5 Development Contributions	*"Dublin City Council may, when granting planning permission, attach conditions requiring the payment of contribution(s) in respect of public infrastructure and facilities, benefiting development in its area."* The applicant is aware that Dublin City Council may grant permission subject to conditions requiring the payment of contributions in respect of public infrastructure and facilities.
15.4 Key Design Principles	
15.4.1 Healthy Placemaking	*"Key principles to consider are:* • *The contribution to the public realm for the benefit and / or enjoyment of the locality.* • *The ability to create a sense of place and community using existing site features, tree coverage and landscaping to support green infrastructure and healthy streets.* • *The use of high quality materials and finishes including hard and soft landscaping.* • *The orientation of open space and the accessibility to daylight and sunlight.* • *Quality of proposed public, private, and communal open spaces and recreational facilities and the relationship of proposed open spaces with any existing public open space including linkages and permeability to adjacent neighbourhood, facilities and streets.* • *The accessibility of the development and the traffic calming measures in place in accordance with DMURS.* • *The attractiveness of the development for various activities such as walking, cycling, sitting, dining etc.* • *Inter-relationship of buildings / dwellings, roads, pedestrian ways, neighbourhood centre facilities and local parks and green areas – active frontages and passive surveillance will be encouraged.* *All developments will be encouraged to support the creation and nurturing of sustainable neighbourhoods and healthy communities, which are designed to facilitate active travel including walking and cycling, close to public transport insofar as possible, and a range of community infrastructure, in quality, more intensive mixed-use environments in line with the principles of the 15 minute city as set out in Chapters 4 and 5. The provision of active recreation and sports facilities in new neighbourhoods and public spaces will be supported as well as greening measures including the use of nature based water retention infrastructure in the public realm (see policy GI27, objective GIO5)."* The overarching key principles of healthy placemaking has been taken into account in the formulation of the design process of the proposed development. Please refer to the design statement prepared by C + W O'Brien Architects for a comprehensive response in how the proposal accords with the key principles of healthy placemaking.

	Dublin City Council are respectfully invited to review planning permission Reg. Ref. LRD6057/24-S3A to assess how the development has evolved over time, particularly through the consultation periods held with Dublin City Council's planning department.
15.4.2 Architectural Design Quality	"*Key principles to consider are:* • *The character of both the immediately adjacent buildings, and the wider scale of development and spaces surrounding the site.* • *The existing context and the relationship to the established pattern, form(s), density and scale of surrounding townscape, taking account of existing rhythms, proportion, symmetries, solid to void relationships, degree of uniformity and the composition of elevations, roofs and building lines. The scale and pattern of existing streets, squares, lanes and spaces should be considered.* • *The existing palette of materials and finishes, architectural detailing and landscaping including walls, gates, street furniture, paving and planting.* • *The suitability of the proposed design to its intended land use and the wider land-use character of the area, along with its relationship with and contribution to the public realm.* • *The design of new development should respect and enhance the Dublin's natural assets such as river and canal frontages, the River Liffey and many quality open spaces that contribute positively to the cityscape and urban realm, the settings of protected structures, areas of special interest and important views and that the design incorporates high quality detail, materials and craftsmanship.* • *The need to protect and enhance natural features of the site, including trees and any landscape setting.* • *The context and orientation in relation to daylight, sunlight and overshadowing and environmental performance including climate impacts such as downdraft or wind tunnelling.* • *The main routes which should be distinguished by exploiting vistas, key buildings and landmarks with the activities and functions of the places made visible, thus bringing a sense of liveliness to spaces.* • *Landmark features which can be used to give treatment to main entrances to a development, complement open spaces and assist in place-making and identity."* As permitted under Reg. Ref. LRD6057/24-S3A, the use of high-quality materials and finishes and the appropriate building form, the architectural quality of development will positively contribute to the urban design and streetscape, enhancing the overall quality of the urban environment. In particular, the development responds creatively to and respect and enhance its context. As permitted under Reg. Ref. LRD6057/24-S3, the architectural package is accommodated by a schedule of materials report that indicate the selected material choices for the proposed development, and those subsequently detailed at planning compliances stage of the process. These are not proposed to be changed under these proposed modifications. We invite the Planning Authority to refer to Reg. Ref. LRD6057/24-S3A for further details into the material choices of the permitted development. DOWNEY submit that an updated Daylight and Sunlight Assessment has been completed and submitted under separate cover of this report outlining the updated proposed

	modifications is compliant and allows for appropriate levels of daylight/sunlight for each permitted apartment and the proposed additional 10 no. units.
15.5 Site Characteristics and Design Parameters	
15.5.8 Architectural Design Statements	*"Applications for 50+ residential units should be accompanied by an Architectural Design Statement or any application below the threshold where the planning authority consider it necessary.* *Design Statements should include the following information as set out in the table below which build upon the detail of the key design parameters.* *Table 15-2: Information Requirements for Design Statements* ***Residential Developments*** *Site Location and Description* *Context and Setting* *Urban Design Rationale* *Design Evolution / Alternatives Considered* *Block Layout and Design* *Site Connectivity and Permeability* *Height, Scale and Massing* *Materials and Finishes* *Open Space (Private, Communal, Public)* *Public Realm Contribution* *Compliance with Internal Design Standards* *Daylight and Sunlight* *Overlooking, Overbearing, Overshadowing* *Car and Cycle Parking* *Management/Lifecycle Report* *Compliance with DMURS* *Safety and Security* *Universal Access* To comply with the requirements of Section 15.5.8, An Architectural Design Statement has been prepared by C + W O'Brien Architects is submitted under separate cover of this application. This report illustrates the principles that have been outlined within Table 15.2. We invite the Planning Authority to refer to this document for a comprehensive response to the design facets of the proposed development. For further details on the development scheme in its entirety with respect to SDRA8, we respectfully refer Dublin City Council to planning permission Reg. Ref. LRD6057/24-S3A.
15.7 Climate Action	
15.7.2 District Heating	"*District heating is a system for distributing heat generated in a centralised location for residential and commercial heating requirements such as space heating and water heating.* *District heating systems will be supported in areas identified in Chapter 3: Climate Action. In these areas, all applications should be designed to cater for district heating systems. The details of the heating system proposed and compatibility with the district heating*

	network should be specified in all planning applications. Applicants are requested to submit a Climate Action and Energy Statement with all planning applications in this zone – see below. *Where district heating systems are not yet in operation, the applicant is required to demonstrate how the proposed heating system of the development can connect and facilitate future use of the district heating system once in place, see policy CA15, CA16, CA17 and CA18 for further information*." Please refer to the previously permitted Climate Action Energy Statement prepared by DKP_{en} submitted under planning permission Reg. Ref. LRD6057/24-S3A for further details on how the proposed development has considered the inclusion of low carbon energy and heating solutions as part of the overall design and planning of the proposed development.
15.9 Apartment Standards	
15.9.1 Unit Mix	**** These have now been updated by the Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025). The below unit mix reflects the most recent guidelines.*** "*Specific Planning Policy Requirement 1 states that housing developments may include up to 50% one bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms unless specified as a result of a Housing Need and Demand Assessment (HNDA) carried out by the Planning Authority as part of the Development Plan process."* The proposed development will consist of 10 additional units to now provide a total of 120 units, comprising of 74 no. 1 beds, 43 no. 2 beds, 2 no. 3 beds, and 1 no. 4 bed across 3 no. blocks. DOWNEY submit that this is acceptable in principle and in accordance with the Planning Design Standards for Apartments., 2025
15.9.2 Unit Size / Layout	**** These have now been updated by the Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025). The unit size and layout reflect the most recent guidelines.*** *"Specific Planning Policy Requirement 3 sets out the minimum floor areas for apartments. The minimum standards for apartments, as set out in the guidelines are as follows:*

Table 15.5 Minimum Floor Area Requirements for Apartments

Unit Type	*Bedspace*	*Floor Area Requirements*
Studio	*1 bedspace*	*37 sq. m.*
1 bed	*2 bedspaces*	*45 sq. m.*
2 bed	*4 bedspaces*	*73 sq. m.*
3 bed	*5 bedspaces*	*90 sq. m.*

These units will be restricted to a maximum of 10% of the overall unit mix. The 2 bedroom, 3 person unit will only be considered as part of specialist housing provision as specified above and will not be considered as standard residential accommodation. The majority of all apartments in any proposed scheme of 10 or more apartments (excluding Build to

	Rent accommodation) shall exceed the minimum floor area standard for any combination of the relevant 1-, 2- or 3-bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not included as units that exceed the minimum by at least 10%). In accordance with the Housing Options for an Ageing Population Policy Statement 2019, 50% of the apartments that are in excess of the minimum sizes should be designed in accordance with the guidance set out in Universal Design Guidelines for Homes in Ireland 2015 to ensure that they are suitable for older people, mobility impaired people, people living with dementia and people with disabilities. Flexibility and adaptability are key considerations in the design of residential units. The concept of habitable rooms as distinct from bedrooms is important as it allows a residential unit to adapt to the needs of its residents over time (with the exception of the studio unit). A habitable room of suitable size and design can change from a dining room to a bedroom, to a study as needs change. In particular, the second/ third bedroom should be flexible and the residential unit made attractive to households at different lifecycle stages. Furthermore, layouts and dimensions should allow for the delivery of furniture and facilitate home working where feasible. For larger dwellings, the provision of one main living room separate from a combined kitchen/dining area should be considered. The needs of children must be considered in the design of the unit and this includes play areas, storage for play equipment, bathrooms big enough to bath a child, study areas, etc." The proposed unit typologies as submitted under cover of the planning drawings to the floor plans and within the Schedule of Accommodation (HQA), have had cognisance of the minimum standards as set out within the 'Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025)', and as such accords with the proper planning and sustainable development of the area. Please refer to the enclosed floor plans and HQA prepared by C + W O'Brien Architects for further information in this regard.
15.9.3 Dual Aspect	**** These have now been updated by the Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025). The unit size and layout reflect the most recent guidelines.*** ***SPPR3 now requires a minimum of 25% dual aspect.*** "*Specific Planning Policy Requirement 4 requires a minimum of 33% dual aspect units in central and / or accessible urban locations and 50% of units in suburban and / or intermediate locations.* *Dublin City Council will encourage all developments to meet or exceed 50% dual aspect within the development unless specific site characteristics dictate that a lower percentage may be appropriate*." The proposed development comprises of 47% dual aspect apartments in a central urban location, which exceeds the minimum requirement of 25% of the apartments to be dual aspect as outlined. We invite the Planning Authority to refer to the Housing Quality Assessment prepared by C + W O'Brien Architects for further information which depicts which apartments are single aspect and dual aspect, with 47% of the units to be dual aspect.

15.9.4 Floor to Ceiling Height	"*SPPR 5 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) set out the requirements for minimum floor to ceiling heights. A minimum floor to ceiling height of 2.7m for ground floor residential units and a minimum of 2.4m in upper floor shall be provided. Where commercial units are proposed or where flexibility for adaptation to alternative uses is required at ground floor level, a floor to ceiling height of 3.5m to 4m shall be applied. This will be assessed on a case by case basis*." A minimum floor to ceiling height surpassing 2.7 metres has been incorporated into the proposed design, with the ground floor levels comprising of 3.1 metres from floor-to-floor height at ground level. Please refer to the Site Sections prepared by C + W O'Brien Architects for further information in this regard. There are no changes proposed from that previously permitted under Reg. Ref. LRD6057/24-S3A.
15.9.5 Lift, Stair Cores and Entrance Lobbies	"*Specific Planning Policy Requirement 6 as set out in the Sustainable Urban Housing: Design Standards for New Apartments (2020) specifies that a maximum of 12 apartment per core may be provided. The maximum provision may be relaxed for refurbishment or infill sites of 0.25ha on a case by case basis*. *See Section 3.26 to 3.34 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details*." We invite the Planning Authority to refer to the Floor Plans prepared by C + W O'Brien Architects for further information which depicts that the proposed cores of the apartments are compliant with Section 15.9.5.
15.9.6 Internal Storage	"*Internal storage within an apartment unit shall be provided in accordance with the Sustainable Urban Development: Design Standards for New Apartments as set out in Appendix 1 and Section 3.30 to 3.34 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details. Flexibility shall be provided in certain circumstances on a case by case basis*." We invite the Planning Authority to refer to the Housing Quality Assessment prepared by C + W O'Brien Architects for further information which depicts the dedicated storage space allocated per apartment unit.
15.9.7 Private Amenity Space	"*Private amenity space shall be provided in the form of terrace, balcony or private garden and should be located off the main living area in the apartment. The minimum areas for private amenity are set out in Appendix 1 and Section 3.35 to 3.39 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.* *At ground floor level, private amenity space should be sufficiently screened to provide for privacy. Where ground floor apartments are to be located adjoining the back of a public footpath or other public area, consideration may be given to the provision of a 'privacy strip' of approximately 1.5 m in depth, subject to appropriate landscape design and boundary treatment*." It is submitted that the proposed development is in keeping with the requirements and standards of the 'Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025)'. For full details in this regard, please refer to the Architectural

	Drawings and HQA prepared by C + W O'Brien Architects submitted under separate cover of this application.
15.9.8 Communal Amenity Space	"*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.* *The minimum areas for private amenity are set out in Appendix 1 and Section 4.10 to 4.12 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details*." It is submitted that communal amenity space meets the requirements of the 'Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025)'. We respectfully invite Dublin City Council to refer to the drawings, HQA and SOA prepared by C + W O'Brien Architects submitted under separate cover of this application.
15.9.12 Access and Services	"*Pedestrian and vehicular access points should be clearly identified and located in areas that are physically overlooked. Pedestrian access should cater for all users including disabled persons and the elderly. Internally within a scheme, access to each individual unit should be clearly identified and well-lit through natural light where feasible*." It is submitted that the design has maintained appropriate access and services, consistent with that previously permitted under LRD6057/24-S3A and accepted by Dublin City Council. For further details on the development scheme in its entirety with respect to access and services, we respectfully refer Dublin City Council to planning permission Reg. Ref. LRD6057/24-S3A and the drawings submitted under separate cover of this application prepared by C + W O'Brien Architects.
15.9.16.1 Daylight and Sunlight	"*A daylight and sunlight assessment should be provided to assess the impact of the proposed development on the surrounding properties and amenity areas outside the site boundary and assess the daylight and sunlight received within each individual unit and communal areas of a proposed scheme*." An updated Daylight and Sunlight analysis was conducted by Digital Dimensions for the proposed revisions to the apartment mix submitted under separate cover of the proposed alterations to that previously permitted. The proposed development has taken into account the optimal layout that would ensure that each unit receives a sufficient level of daylight and sunlight. The proposal is therefore in accordance with the requirements as set out within Daylight and Sunlight. We respectfully invite the Planning Authority to refer to the report for further details.

5.0 CONCLUSION

This Planning Statement and Statement of Consistency has been prepared by DOWNEY to accompany a planning application for proposed modifications to a previously permitted Large-scale Residential Development (LRD) under planning permission Reg. Ref. LRD6057/24-S3A on lands at 23 - 28 Prussia Street, Dublin 7.

This Statement of Consistency provides clear detailed on how the proposed modifications complies with the relevant national, regional, and local planning policy relevant to the subject site. DOWNEY submit that the proposed development will provide 10 no. additional units at the subject lands that are zoned for residential development as previously approved under Reg. Ref. LRD6057/24-S3A. For further details on the development scheme in its entirety, we respectfully refer Dublin City Council to planning permission Reg. Ref. LRD6057/24-S3A.

It is submitted that the proposed development is in accordance with the proper planning and sustainable development of the area in which it is located as expressed in national, regional and local planning policy and Guidelines issued under Section 28 of the Planning and Development, 2000 (as amended).