

Statement of Response to LRD Opinion

**For a Large-Scale Residential
Development
(Purpose-Built Student Accommodation
Scheme)**

**Lands at the former “Matt’s of Cabra”
Public House, 2A Fassaugh Avenue,
Dublin 7,
D07TH77**

On behalf of

**R & D Developments Limited
(in Receivership)**



January 2026



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1 Introduction

We, Brock McClure Planning and Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin have been instructed by our client, **R & D Developments Limited (in Receivership), Grant Thornton, 13-18 City Quay, Dublin 2, D02 ED70** to prepare this Response to Dublin City Council's Large – Scale Residential Development (LRD) Opinion issued on the 23rd of September 2025 to support the application for a purpose-built student accommodation (PBSA) development at lands at the **former "Matt's of Cabra" Public House, 2A Fassagh Avenue, Dublin 7, D07 TH77**.

This report is a response to the issues and queries raised in the LRD Opinion issued by Dublin City Council on the 23rd of September 2025 following the pre-application process and with regard to the consultation meeting for the application for a LRD on the subject site.

This response is prepared in association with the Design Team for the scheme. Each item is addressed in turn and relevant cross references to other accompanying documentation are provided.

This report also refers to the information the Planning Authority required to be submitted in accordance with Article 16A (7) of the Planning and Development Regulations, 2001 (as amended).

1.1 LRD Meeting

The LRD Meeting was held with Dublin Council on the 25 September 2025, and was attended by representatives of the Applicant, the Design Team and representatives of the Planning Authority from *inter alia* Planning, Drainage, Roads, Housing and Parks Sections.

The LRD Meeting was informed by the LRD Meeting Request, submitted to the Planning Authority electronically which consisted of a draft Planning Application, including a largely designed scheme and a wide range of supporting documents.

1.2 LRD Opinion

The LRD Opinion prepared by the Planning Authority, issued electronically on 21 October 2025, confirms that the documentation submitted at pre-application consultation does **"constitute a reasonable basis on which to make an application for permission for the proposed LRD"**. We welcome this conclusion by the Council.

Under the provision of Section 32D of the Act, the LRD Opinion identifies 5 no. items that require the Applicant's Response as part of the LRD Planning Application. These are addressed in Section 2 of this Report.



2 Response to LRD Opinion

Pursuant to Section 32D of the Planning and Development Act 2000 (as amended), the Planning Authority is of the Opinion the documents submitted do not constitute a reasonable basis on which to make the application – however the Planning Authority considers that the following issues, if addressed by the relevant documents, could result in the documents constituting a reasonable basis on which to make the application:

2.1 Item 1 – Planning Issues

“a) The applicant shall demonstrate how effective the proposed Stage 2 angled and louvre treatments to the eastern above-ground floor opes will be in ameliorating/redirecting potential viewing cones eastwards towards the rear gardens and back of properties of St. Attracta Road. Noting the type of occupation involved it is considered that there is always more scope for application of ameliorating measures to a student scheme than say a standard residential scheme in terms of impacts on outlook. Further treatments/measures should be considered so as to contain ‘overlooking’ within the site as best as possible - notwithstanding the ‘allowances’ provided under the 2024 Compact Settlement Guidelines.”

Applicant Response:

In response to LRD Opinion Item 1 (a), we refer the Planning Authority to drawing no. FAC-02-XX-Loo-DR-RAU-AR-1008 which shows the view lines of the proposed angled windows.

The proposed development has been designed with careful consideration of view lines to avoid undue impacts on the amenity of adjoining properties along the eastern boundary. The introduction of deep reveals, coupled with deliberately oriented windows toward the southern aspect along the eastern façade, fully mitigates any undue overlooking and supports the protection of existing residential amenity.

b) A good quality brick treatment shall be used as primary finish on all new elevations – with overall a limited palette of high-quality materials to be applied throughout the scheme. Service doors and other external fittings shall be finished/treated to blend with their host finish as best as possible.

Applicant Response:

In response to LRD Opinion Item 1 (b), the proposed development features a limited palette of high-quality, robust materials through the scheme. A textured blond coloured brick throughout, altering orientation or pattern in areas to distinguish use, or for way-finding purposes. The boundary walls and additional structures such as the substation and refuse area all feature the same brick as the main block on site in order to maintain material continuity. Service doors and other external fittings are designed to be visually recessive and sympathetic, continuing the narrative of a simple material palette that unifies the built form.



Figure 1 - Proposed Materials

c) Further enlivening of the front ground floor elevations onto the streetscape shall be considered in the interests of vitality of the local streetscapes. To provide for a much firmer urban edge onto the existing fragmented streetscape. Consideration of further works is required on proposed materials and planting – which should both order and soften the floorscape fronting the development – which will in turn help relieve the existing somewhat ‘harsh’ immediate streetscape.

Applicant Response:

In response to LRD Opinion Item 1 (c), it is noted to the Planning Authority that the front elevation has been tested extensively to ensure it responds appropriately to the existing streetscape through improved architectural treatment, landscaping, and potential active frontage to create a more engaging and pedestrian-friendly environment. By landscaping the street frontage and creating seating and contemporary art displays it encourages use and interaction with the site in a productive manner.

In addition, it is noted that the scheme has been designed to deliver an active and engaging frontage through the strategic placement of high-quality, transparent student amenity spaces at both ground and first floor levels, which will be visible from the public realm and contribute to street-level animation throughout the day and evening. In addition, the proposal includes the creation of a publicly accessible plaza at the corner of Fassagh Avenue, designed as a vibrant and welcoming space that will encourage pedestrian activity, enhance the public realm, and improve social interaction in the area. Together, these measures will activate the frontage and positively contribute to the vibrancy of Fassagh Avenue

d) The Stage 3 application should demonstrate as to how the proposed scheme accounts for and/or overcomes any previous reasons for refusal on site.

Applicant Response:

In response to LRD Opinion Item 1 (d), we acknowledge that the subject site’s planning history has a recently refused application by An Coimisiún Pleanála which sought the construction of an SHD scheme consisting of 117 no. build-to-rent apartments with all ancillary development (Reg. Ref. TA29N.312859, refers). The application was refused for 3 no. reasons and the applicant and design team responses are as follows:

“1. Having regard to the Urban Development Building Height Guidelines for Planning Authorities, issued by the Department of Housing, Planning and Local Government in December 2018, it is considered that the proposed development by reason of its design, scale, bulk and mass would be out of character with the context of the site, would represent a visually prominent and monolithic form of development relative to its immediate environment, would be visually obtrusive, and would seriously detract from the visual amenities and character of the area when viewed from the east and from the west, and in combination with the design in terms of façade treatment and architectural expression, would not constitute an adequate design response to the context and opportunity of this urban infill site, and would not, therefore, be in accordance with the criteria set out under section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities, issued by the Department of Housing, Planning and Local Government in December 2018.

Applicant Response to Reasons for Refusal

From the outset, we note to the Planning Authority that since the decision was made on the above mentioned application, the planning context has significantly changed including the publication of a the Dublin City Development 2022-2028 and the Sustainable Residential Developments and Compact Settlement Guidelines for Planning Authorities, 2024 which place significant emphasis on the sustainable and compact development.

We note that following this decision, the applicant, Grant Thornton, made a decision to consider in significant detail the commentary of the Council and An Bord Pleanála at that time (now An Coimisiún Pleanála), and identified the clear issues raised which would need to be brought forward and responded positively to in any new design proposal.

Reddy Architecture + Urbanism were appointed following a lengthy design competition process by the applicant, which involved a number of architectural practices and involved an assessment of site-specific design concepts envisioned for the subject location. The process for selecting a “site specific”

architectural response has, in our view, responded positively to the range of valid issues expressed through this LRD process and the previous SHD decision.

The proposed design of the buildings provides a contemporary architectural form which places a significant emphasis on protecting adjoining residential amenity through the modulation of heights, appropriate set back distances and provision of angled windows to prevent any overlooking. In addition, this site-specific design approach has resulted in the creation of an active and attractive street frontage and public plaza area fronting Fassauga Avenue.

The criteria set out under Section 3.2 of the Building Height Guidelines are as follows, followed directly by our response:

“At the scale of the relevant city/town:

- ***The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.***
- ***Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.***
- ***On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.”***

Applicant Response

- The site is well served by public transport as follows:
 - **Urban Bus:** The subject site is located in close proximity to high-frequency urban bus stops. There are several bus stops in the immediate vicinity of the site offering connections to Dublin City Centre, Dublin Airport and other employment, educational and recreational amenities and services in the wider Dublin area. There is a bus stop (No. 4485) located directly across from the subject site. There is another bus stop (no. 4371) located 255 m from the subject site on Drumcliffe Drive.
 - **BusConnects:** The subject site is located approx. 1 km from the Navan Road Bus Stop No. 4498 which is serviced by BusConnects route N2 which runs at a frequency of 15 minutes. The subject site will be in proximity to the B Spine / Branch Route, Peak Time Routes, Local Routes, Orbital Routes and Other City Bound Routes as the BusConnects scheme continues to roll out. Further, we note that the Navan Road approx. 1 km from the subject site is a Core Bus Corridor.
 - **Luas:** The subject site sits approx. 750 m / 10-minute walk from the Cabra Luas stop which is serviced by the Green Luas line between Broombridge and Brides Glen. The peak time frequency of the Luas is 4-6 mins.
 - **DART:** The site is also located approx. 1.2km (16-minute walking distance) from the Broombridge Train Station. This station is serviced by InterCity and Commuter Trains with destinations to Connolly Station, Dun Laoghaire, Grand Canal Dock, Sligo, M3 Parkway, Longford and Maynooth.
 - **Proposed MetroLink:** The subject site currently sits approx. 1.5 km from the planned Glasnevin Metro stop.
- Every effort has been made by the scheme architect and landscape architect to visually assimilate the development with the surrounding built and natural environments to provide a vibrant scheme.
- The proposed development makes a positive contribution to the built and natural environment of this urban area. The proposal provides generous circulation spaces, paths,

public, private and communal open spaces, public plaza and active ground floor frontages creating a visual interest in the streetscape.

“At the scale of district/neighbourhood/street:

- *The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape*
- *The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.*
- *The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).*
- *The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.*
- *The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.”*

Applicant Response

- The landscape proposal greatly enhances tree and shrub planting on site with pockets of planted communal and public open spaces dispersed throughout the development, creating an improved sylvan residential setting.
- Materials and finishes shall be well considered as the design of the scheme progresses to respond to the surrounding environment.
- The proposal submitted enhances the urban design context and provides generous public and private open spaces, paths, public plaza and active uses and creates a visual interest in the streetscape and enhances a sense of scale and enclosure.
- The proposal makes a positive contribution to the improvement of legibility through the subject site into the wider urban area through the provision of active frontages at ground floor level.
- The orientation of the blocks and setbacks from the front boundary is appropriate and in keeping with the surrounding settings.
- The proposed development brings a new use to the locality contributing positively by adding a wider and varied mix of uses in the area.

“At the scale of the site/building

- *The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.*
- *Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment’s ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’.*
- *Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.”*

Applicant Response

- The form, massing, and height of the proposed development have been thoughtfully and strategically designed to optimise environmental quality both within the site and in relation to its surroundings. Careful modulation of the building envelope ensures that access to natural daylight and ventilation is maximised for both future occupants of the development and neighbouring properties. Additionally, the orientation and stepped massing have been arranged to preserve key view corridors and reduce visual bulk, contributing to a more harmonious integration into the existing urban fabric.
- To assess the potential effects on surrounding properties, a preliminary daylight and sunlight study has been undertaken in accordance with recognised guidelines. The findings of this initial assessment indicate that the proposed development will not result in any significant or unacceptable loss of daylight or sunlight to adjacent residential buildings. Overshadowing has been minimised through strategic placement and variation in building heights, ensuring that the amenity of neighbouring occupiers is safeguarded. This demonstrates a commitment to responsible design and sensitivity to the existing context.

2. The proportion of single aspect apartments in the proposed development and quality of the internal layout, specifically the design of excessively long internal corridors with lack of natural light and adequate ventilation, in addition to the design and location of balconies, and positioning of windows giving rise to overlooking between apartments, would fail to provide an adequate level of residential amenity for future occupants of the scheme and would be contrary to guidelines issued for Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities issued by the Department of Housing, Planning and Local Government in December 2020.”

Applicant Response

It is acknowledged that the proposed development is intended for use as student accommodation, a typology which is typically subject to different design standards compared to conventional apartment or residential schemes. While student housing does not require adherence to the same stringent internal space or amenity benchmarks as standard residential developments, the design team has nonetheless adopted best practice principles throughout the scheme to ensure a high-quality living environment for future occupants. For a student accommodation development, it is reasonable to expect occupants to spend more time in their ‘bedrooms’ than in a typical dwelling, as these rooms also serve as study and private living areas. In recognition of this, a higher SDA target value of 150 lux has been applied to bedrooms, exceeding the 100 lux level recommended by the BRE Guidelines. Despite this higher standard, a high compliance rate (c. 99% without trees and c. 97% with trees) has been achieved.

In particular, the layout avoids the use of long, enclosed internal corridors; an approach that not only enhances wayfinding and safety but also contributes to a more comfortable and sociable internal environment. The design ensures adequate levels of natural ventilation and provides access to both sunlight and daylight within habitable rooms and shared spaces, creating a healthy and welcoming internal atmosphere. Furthermore, the development has been carefully planned to prevent any overlooking into adjacent residential properties, thereby preserving the privacy and amenity of neighbouring occupiers. We specifically highlight that the proposed windows on the eastern elevation will be angled so as to prevent undue overlooking into the rear of the properties on St. Attracta’s Road.

These measures collectively demonstrate a thoughtful and responsible approach to student housing that aligns with contemporary expectations for sustainability, liveability, and contextual sensitivity.

3. The Board is not satisfied on the basis of the Daylight, Sunlight and Shadow Report submitted, that the proposed development would not be detrimental to the established residential amenity of existing dwellings to the east, and the failure of a number of proposed apartments to reach minimum daylight target standards in the absence of robust mitigating compensatory measures, would result in poor residential amenity for future occupants. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.”

Applicant Response

We refer the Planning Authority to the accompanying Daylight and Sunlight Assessment Report prepared by 3D Design Bureau and the results can be summarised as follows:

Effect to Daylight – Vertical Sky Component (VSC):

In total, 71 no. windows were assessed across 23 no. properties from 285 to 329 St. Attracta Road. As the proposed development is on a greenfield site, some level of effect is expected.

The effect on 9 no. of the assessed windows (across 5 properties) has been categorised as ‘moderate adverse’. It is important to note that all windows showing a ‘moderate adverse’ effect are part of rear extensions. These extensions bring the windows closer to the site boundary, resulting in a higher level of impact than would be experienced on the original building facade.

Of the remaining windows, approximately half meet the BRE recommendations for VSC impact and are categorised as ‘negligible’. The impact on the other half is considered ‘minor adverse’.

The results of the impact assessment indicate that the vast majority of neighbouring residential windows will experience a ‘negligible’ or ‘minor adverse’ level of effect. This is consistent with urban regeneration on a mostly vacant site that is somewhat constrained. Regarding the ‘moderate adverse’ impacts to daylight (VSC) identified at 289, 293, 295, 297 and 299 St. Attracta Road, this report demonstrates that the higher level of effect, in these instances, when compared with the ‘minor adverse’ level of effect in similar receptors, is attributable to the existing ground-floor rear extensions of those properties. Consequently, the development potential of the subject site may be restricted unless this level of effect is deemed acceptable by the planning authority.

Effect to Sun on Ground (SOG):

A SOG impact assessment conducted on 29 no. rear gardens at 273 to 329 St. Attracta Road on March 21st shows that all gardens will comfortably continue to meet the relevant BRE Guidelines, meaning sunlight access will not be adversely affected. The one exception is the garden of 277 St Attracta Road, which is categorised as ‘non-applicable’ (n.a.). This classification is used because its baseline sunlight access is already extremely low, with only 0.4% of the garden receiving two hours of direct sunlight on March 21st. Since this value remains unchanged at 0.4% in the proposed state, the actual effect on this garden should be considered negligible.

Scheme Performance – Spatial Daylight Autonomy (SDA)

For a student accommodation development, it is reasonable to expect occupants to spend more time in their ‘bedrooms’ than in a typical dwelling, as these rooms also serve as study and private living areas. In recognition of this, a higher SDA target value of 150 lux has been applied to bedrooms, exceeding the 100 lux level recommended by the BRE Guidelines. Despite this higher standard, a high compliance rate (c. 99% without trees and c. 97% with trees) has been achieved.

Scheme Performance – Sunlight Exposure

All proposed ‘units’ meet the recommended level of ‘Sunlight Exposure’ because while some individual bedrooms may have low sunlight access due to their orientation, they are clustered with a well-sunlit communal room (LKD). This design ensures all students have access to an internal space with sufficient sunlight, with the majority of those spaces achieving ‘high’ sunlight levels.

Scheme Performance – Sun on Ground

All assessed spaces comfortably exceed the recommended minimum levels for Sun On Ground as set out in the BRE Guidelines. This indicates that future occupants will have access to communal outdoor spaces with excellent neighbouring potential while neighbouring occupants will also benefit from a well sun-lit public open space.

The results show that the proposed development has been designed in a way, in so far as possible, to respect existing residential amenity and the proposed development will achieve acceptable levels of sunlight / daylight.

We trust that the submitted scheme addresses the concerns of the Planning Authority in this regard. Further, we emphasise to the Planning Authority that the principle of a student accommodation development has been established as acceptable on the subject site by way of Reg. Ref. TA29N.300666.

e) A study should be provided that compares the Stage 3 development to previous relevant baseline impacts upon the site and environs.

Applicant Response:

In response to LRD Opinion Item 1 (e), we refer the Planning Authority to the following drawings prepared by Reddy Architecture + Urbanism which compares the proposed development vs previously refused SHD development (Reg. Ref. TA29N.312859, refers):

- FAC-02-XX-L00-DR-RAU-AR-0005 and;
- FAC-02-XX-XXX-DR-RAU-AR-2003 prepared by Reddy Architecture + Urbanism.



Figure 2 - Refused SHD Scheme (Red Hatch) overlay on Proposed Development

As evidenced in the elevational comparison above, the majority of the proposed development is lower in height than the previously refused SHD scheme, with a more consistent reduction in height across large portions of the elevation. While a limited area of the proposed scheme marginally exceeds the height of the refused SHD at a localised point, this does not surpass the maximum height envelope of the SHD proposal.

Importantly, the proposed Stage 3 scheme demonstrates a significantly improved approach to massing and height distribution, with greater modulation and stepped transitions that break down the overall scale of the buildings. This results in a reduced perception of bulk and a more coherent relationship with the surrounding context, notwithstanding the localised increase in height at one portion of the elevation.

On balance, the proposed development represents a qualitative improvement over the refused SHD scheme in terms of height strategy, massing articulation, and visual impact, when assessed against the relevant baseline conditions for the site and its environs.

f) A full daylight / Sunlight / Shadow study shall be submitted at Stage 3.

Applicant Response:

In response to LRD Opinion Item 1 (f), we now refer the Planning Authority to the accompanying Daylight and Sunlight Assessment Report (including a shadow study) prepared by 3D Design Bureau for further information in this regard.

g) Any proposed signage shall be well designed.

Applicant Response:

In response to LRD Opinion Item 1 (g), no formal signage is proposed as part of this application. Any future signage would be dealt with by way of a separate permission, as required.

h) The applicant should consider consulting the DAA and Air Nav Ireland if proposed solar panels/PV are to be cumulatively over 300m2."

Applicant Response:



In response to LRD Opinion Item 1 (h), we confirm to the Planning Authority that no solar / PV panels are proposed as part of this development.

2.2 Item 2 – Drainage

“a) No attenuation tanks and Green/blue roofs are proposed are proposed which are welcomed.

Applicant Response:

In response to LRD Opinion Item 2 (a), we refer the Planning Authority to Section 9 of the accompanying Engineering Services Report prepared by Lohan & Donnelly Consulting Engineers. We confirm that no changes to the previous Stage 2 LRD submission have been made in relation to attenuation tanks and green / blue roofs. No attenuation tanks have been proposed and all available roof area are proposed to be green / blue roofs. We refer the Planning Authority to drawing no. 24227-LDE-ZZ-ZZ-DR-C-1C01 for further information in this regard.

b) It was mentioned that there were discussions with Irish Rail regarding installing a pipe over the existing bridge, there does not seem to be a deep enough roadway within the bridge to install the pipe. The proposal is to now connect to the combined sewer. Further Information will be required to clarify this matter at Stage 3.

Applicant Response:

In response to LRD Opinion Item 2 (b), it is confirmed that Lohan & Donnelly Consulting Engineers have liaised with DCC's Drainage Division. It was agreed in principle that feasibility of installing a pipe over the existing bridge will be confirmed via trial holes where necessary at post planning stage. The proposal remains to connect to the combined sewer.

c) Further Information regarding the exceedance, i.e., where the water will flow to in event of a blockage, should be added to the flood risk assessment.

Applicant Response:

In response to LRD Opinion Item 2 (c), we now refer the Planning Authority to Section 5.2.1 of the accompanying Flood Risk Assessment prepared by Lohan & Donnelly Consulting Engineers. This new section includes overland flows for the proposed development during an exceedance event. The section shows and highlights the differences between the existing site and proposed development with regards to the overland flow routes.

d) If infiltration is assumed on the permeable paving to the embankment side of the proposed development, this needs to be agreed with Irish Rail as it could potentially pose an issue.

Applicant Response:

In response to LRD Opinion Item 2 (d), it is noted that the proposed permeable paving along the embankment side of the development will be a tanked system. This means that the surface water won't be allowed to infiltrate into the ground but instead it will be directed and flow at a controlled rate into the proposed drainage network. The proposed grassed landscape in this area will not be tanked but instead allow to infiltrate. This is because by tanking any grassed areas, it could harm or damage any proposed planting in this areas. Furthermore, in the existing condition, the entire embankment side of the site is currently all grassed which means just by tanking the permeable paving, this will greatly improve upon the current condition.

e) The proposed landscaping areas should tie into the permeable paving. Tree pits, raingardens, swales, should all connect with the permeable paving to add more biodiversity and interception storage.

Applicant Response:





In response to LRD Opinion Item 2 (e), we confirm that 4 no. raingardens have been proposed within the development, two towards the front of the site and a further two more within the central courtyard area. These rain gardens sit slightly lower than the surrounding paving so that when the permeable paving fills or during heavier rainfall, water can naturally flow into them. This means the paving and the soft SuDS features work together rather than as separate elements. The rain gardens provide extra interception storage, improve treatment of runoff, and introduce more varied planting to support biodiversity.

f) It shall be confirmed whether any part of this shall be taken in charge by DCC.

Applicant Response:

In response to LRD Opinion Item 2 (f), we confirm that the proposed development will be privately managed. We refer the Planning Authority to the accompanying Taken in Charge plan on drawing no. FAC-02-XX-Loo-DR-RAU-AR-0008 prepared by Reddy Architecture which denotes that the area of lands within the application red line boundary in the Council's ownership will remain to be managed by the Council. The remainder of the development including the proposed public plaza will be privately managed.

g) In advance of the final application the applicant is advised to consult with the DPPDCCC section to ensure the above concerns are adequately addressed."

Applicant Response:

In response to LRD Opinion Item 2 (g), it is confirmed that Lohan & Donnelly Consulting Engineers have liaised with DCC's Drainage Division. The above concerns and how they have been addressed by the design team has been approved by the DPPDCCC prior to the lodgement of this application.

2.3 Item 3 – Transportation

"a) Clarification is required on the exact location of the set down accessible car parking space.

Applicant Response:

In response to LRD Opinion Item 3 (a), we refer the Planning Authority to the Proposed Site Layout Plan on drawing no. FAC-02-XX-Loo-DR-RAU-AR-003 which identifies the location of the proposed accessible car parking space within the subject site adjacent to Block A and we refer to the extracted figure below for convenience.





Figure 3 - Location of proposed accessible car parking space

b) A justification should be provided for the reduction in car parking spaces from stage 1 (5 no. spaces) to 1 no. space.

Applicant Response:

In response to LRD Opinion Item 3 (b), given the nature of the development as PBSA in a highly accessible urban location, car parking provision is wholly eliminated in line with national policy. The scheme proposes 1 no. accessible car parking space. In addition, section 15.13.1.4 of the City Development Plan states that designated car parking will not be supported in student accommodation schemes in the city.

c) Details are required on proposed bicycle parking stands and locations.

Applicant Response:

In response to LRD Opinion Item 3 (c), a total of 308 no. bicycle parking spaces are proposed (258 no. long-stay bicycle parking spaces including 12 no. cargo bike spaces and 50 no. visitor bicycle parking spaces).

The proposed bicycle stands are dispersed throughout the outdoor communal open space and visitor bicycle parking is also proposed within the public plaza.

We refer the Planning Authority to the accompanying Landscape Masterplan on drawing no. 25D06-DR-1000 for further information on the locations of the proposed bicycle stands. In addition, we refer to the Landscape Report which details the design and type of bicycle stands proposed.

d) A bicycle design statement is required.

Applicant Response:

In response to LRD Opinion Item 3 (d), we refer the Planning Authority to the accompanying Bicycle Design Statement prepared by Lohan & Donnelly Consulting Engineers.



e) Details are required on how servicing the site will take place – a service strategy is required. The preference is for servicing within the curtilage of the site. Auto tracking details are required for any servicing vehicles.

Applicant Response:

In response to LRD Opinion Item 3 (e), it is confirmed that site servicing will be carried out within the curtilage of the site. Vehicles will enter the site through the entrance gates and service from within the site.

Further, we refer the Planning Authority to Section 10.2 of the accompanying Mobility Management Plan prepared by Martin Rogers Consulting Limited which details the proposed servicing and delivery arrangements. In addition, we refer the Planning Authority to the following drawings prepared by Lohan & Donnelly Consulting Engineers for the autotracking details:

- 24227-LDE-ZZ-ZZ-DR-SC-1To1 for the high reach fire tender.
- 24227-LDE-ZZ-ZZ-DR-SC-1To2 for the refuse truck swept path.
- 24227-LDE-ZZ-ZZ-DR-SC-1To3 for the general car swept path.

f) Details of refuse and delivery vehicles access and egress and set down areas are required.

Applicant Response:

In response to LRD Opinion Item 3 (f), as noted in response to LRD Opinion Item 3 (e), all site servicing will occur within the site. There will be no vehicles stopping along Fassagh Avenue to service the site. The future management company will be responsible for handling vehicular access into the site through the proposed entrance gates.

g) Clarification on the public realm with regards taken in charge / privately managed (areas to the rear of the public footpath).

Applicant Response:

In response to LRD Opinion Item 3 (g), it is confirmed that the public plaza (areas to the rear of the public footpath) will be privately managed by a full-time professional management company specialising in purpose-built student accommodation. We refer the Planning Authority to the accompanying Taken in Charge plan on drawing no. FAC-02-XX-L00-DR-RAU-AR-0008 prepared by Reddy Architecture which denotes that the area of lands within the application red line boundary in the Council's ownership will remain to be managed by the Council. The remainder of the development including the proposed public plaza will be privately managed.

h) Details are required on the works to the public roadway to incorporate the vehicular entrance. Is any pedestrian priority proposed, or tactile paving provided in order to aid pedestrian access across the site? Application site red line extending into the public roadway will require a Letter of Consent from DCC.

Applicant Response:

In response to LRD Opinion Item 3 (h), we refer the Planning Authority to the Landscape Masterplan drawing no. 25D06-DR-1000. It is confirmed that tactile paving is proposed to aid pedestrians across the existing public footpath.

In addition, we refer the Planning Authority to the accompanying Letter of Consent from DCC dated 9th December 2025.

i) A Transport Assessment is required and associated reports as outlined in Chapter 15 of the City Development Plan 2022-2028.

Applicant Response:

In response to LRD Opinion Item 3 (i), we refer the Planning Authority to the accompanying Traffic Assessment / Servicing and Delivery Plan prepared by Martin Rogers Consulting Ltd. The report



concludes that the development will generate very low traffic volumes, will have no measurable impact on the road network capacity, and includes a clear plan to manage all student and servicing-related vehicle activity on-site.

j) Clarification on how the vehicles will interact with pedestrians and cyclists, this will require a Stage 1 / 2 Road Safety Audit.

Applicant Response:

In response to LRD Opinion Item 3 (j), we refer the Planning Authority to the accompanying Stage 1 & 2 Road Safety Audit prepared by Bruton Consulting Engineers which includes the design teams responses to the problems identified in the RSA. Removable bollards and tactile paving are now proposed to eliminate any potential conflicts between pedestrian, cyclist and vehicular movements into and through the site.

k) The areas for taken in charge should be indicated on taken in charge drawings.”

Applicant Response:

In response to LRD Opinion Item 3 (k), we confirm that the proposed development will be privately managed. We refer the Planning Authority to the accompanying Taken in Charge plan on drawing no. FAC-02-XX-L00-DR-RAU-AR-0008 prepared by Reddy Architecture which denotes that the area of lands within the application red line boundary in the Council’s ownership will remain to be managed by the Council. The remainder of the development including the proposed public plaza will be privately managed.

2.4 Item 4 – Parks, Biodiversity & Landscaping Issues

“a) A review of the Reactional Facilities shall be provided so as to include additional active recreational elements along the ground level circuit path and also Block B 5th floor roof.

Applicant Response:

In response to LRD Opinion Item 4 (a), we refer the Planning Authority to the Landscape Masterplan on drawing no. 25Do6-DR-1000 prepared by Áit Urbanism + Landscape. Proposed recreational facilities at surface level include a half basketball court, outdoor chess, 2 x table tennis, calisthenics equipment, BBQ area, picnic areas and a walking / running loop. It is envisaged that the proposed roof terrace is utilised as more passive open space with proposed seating areas both covered and uncovered and loungers. It is noted that there is ample space on the roof terrace should future students wish to engage in outdoor yoga for more active, recreational use.

b) Roof gardens: It is recommended that a continuous screen planter should be included on the east/residential side of the roof facilities to provide screening of existing residential areas.

Applicant Response:

In response to LRD Opinion Item 2 (a), we refer the Planning Authority to the accompanying Roof Garden Plan on drawing no. 25Do6-DR-1001. A continuous 1.2 m wide raised planter is proposed along the entire extent of the roof terrace. In addition it is noted that a 1.8 m high privacy boundary screen is proposed on the eastern side of the terrace.

c) Public plaza: It is recommended that the surface material should be of natural stone, while the further use of large canopy tree species would be welcome.

Applicant Response:

In response to LRD Opinion Item 4 (c), we confirm that the surface material of the public plaza is proposed to be of natural stone. In addition, a mix of large, medium and small canopy tree species are proposed throughout the public plaza area. We refer the Planning Authority to the Landscape



Masterplan on drawing no. 25Do6-DR-1000 and Landscape Report prepared by Áit Urbanism + Landscape for further information in this regard.

d) Block A East Façade: It is recommended that vertical greening be applied to brick façades facing existing residential area to continue the green boundary approach to be considered.

Applicant Response:

In response to LRD Opinion Item 5 (d), it is noted that external amenity areas, such as roof top terraces are thoughtfully located to support activation, urban outlooks, and biophilic principles. Service elements and façade treatments are integrated within a restrained material palette that unifies the built form. The eastern angled brick façade provides a strong and legible architectural outcome, and additional elements such as a green wall are not considered necessary, as they would detract from the clarity of the design intent.

e) Bike/bin units: It is recommended that there is a coordinated façade design, e.g. wood plank finish in associated landscape setting.

Applicant Response:

In response to LRD Opinion Item 5 (e), it is confirmed that the bicycle store is expressed through wood plank finishes, creating a tactile and natural ground-level interface that reflects sustainable design principles.

f) The following documents are required to be submitted

- **Landscape Masterplan**
- **Hard works/soft works outline plans**
- **Landscape Sections & Elevations**
- **Landscape Design Statement**
- **Open Space Key Plan with public and communal open spaces calculations and schedule of requirement and provision.**
- **Boundary Plan with details,**
- **Birds Eye CGIs over public open spaces**
- **Green Roof Plan with biodiverse planting**
- **AA Screening Report**
- **Ecological Impact Assessment (Include Invasive Species & Bat survey with roost survey assessment)**
- **A bio-diversity enhancement plan shall be provided (including details of 'bat friendly' lighting). The impact of artificial lighting on habitats, foraging species etc should be considered."**

Applicant Response:

In response to LRD Opinion Item 5 (f), we confirm that the additional documentation requested by the Planning Authority have been provided as follows:

- Landscape Masterplan on drawing no. 25Do6-DR-1000 by Áit Urbanism + Landscape.
- Section 3 of the Landscape Report details the Hard Landscape Materials. Section 4 and 5 of the Landscape Report details the Soft Landscape Materials and Specifications.
- Section 2 of the Landscape Report includes Landscape Sections & Elevations.
- A Landscape Report has been prepared by Áit Urbanism + Landscape.
- Section 2 (p.g. 14) of the Landscape Report includes a diagram showing the breakdown of public vs communal open space. A total of 405.5 sqm of public open space is proposed and a total of 2,971.4 sqm of communal open space is proposed.
- Section 3 of the Landscape Report includes a boundary treatment plan and elevations of the proposed type of boundary treatments.
- A birds eye CGI over the public open spaces has been prepared by 3D Design Bureau and we refer the Planning Authority to the accompanying Visuals Booklet.
- An Ecological Impact Assessment including invasive species and bat survey has been prepared by DNV.





- For details on biodiversity enhancement, we refer the Planning Authority to the accompanying Landscape Report and the public lighting layout prepared by OCSC.

2.5 Item 5 – Archaeology

“A detailed desktop Archaeological Impact Assessment shall be provided at Stage 3. The Archaeological Impact Assessment should be prepared in consultation with the City Archaeologist and in accordance with the archaeological policies, objectives and standards in the City Development Plan (2022-8) and the Framework and Principles for the Protection of the Archaeological Heritage (Section 3.6 1999). The Archaeological Impact Assessment should take account of any sites listed on the Dublin City Industrial Heritage Record and provide an outline mitigation strategy for archaeological and industrial heritage, to be developed by the design team and archaeologist prior to construction.”

Applicant Response:

In response to LRD Opinion Item 5, we refer the Planning Authority to the accompanying Archaeological Impact Assessment Report prepared by Archaeological Consultancy Services Unit for further information in this regard.





3 Conclusion

This report, read in conjunction with the Design Team's accompanying reports and drawings addresses, in full the issues raised by the Planning Authority in the LRD Opinion dated 21 October 2025.

It is submitted that the proposed development is in accordance with the proper planning and sustainable development of this area, and we trust that the above report and enclosed documentation fully addresses the issues raised in DCC's LRD Opinion.

All relevant details are further addressed in the revised design, now proposed and we ask the Planning Authority to refer to the complete application package for full details of the proposal now put forward.





Appendix I – Copy of DCC LRD Opinion





Planning and Development Act 2000, as amended

Planning and development (Large Scale Residential Developments) Act 2021

Notice of LRD Opinion

Planning Authority Reference No: LRD6094/25-S2

Location: 2A Fassauga Avenue, Cabra, Dublin 7

Description: Large-Scale Residential Development (LRD) of 249 no. student accommodation bedspaces in 32 no. clusters including 13 no. accessible units and 10 no. studio units with associated internal and external amenity spaces, public open space, bicycle parking and 1 no. accessible car parking space on lands at 2A Fassauga Avenue, Dublin 7, D07 TH77.

Applicant: R&D Developments Limited (in receivership), Grant Thornton

The Planning Authority refers to your request pursuant to section 32 of the Planning and development (Large Scale Residential Developments) Act 2021. Section 32D of the Act provides that the planning authority shall provide an opinion as to whether or not the documents submitted for the purposes of the meeting constitute a reasonable basis on which to make an application for permission for the proposed LRD.

Following consideration of the issues raised during the LRD meeting the Planning Authority is of the opinion that the documentation submitted constitute a reasonable basis on which to make an application subject to the issues raised below being addressed in any documents submitted in a future planning application.

Furthermore pursuant to article 16A of the Planning and Development (Large-scale Residential Development) Regulations 2021 the applicant is hereby notified that, in addition to the requirements of section 32D, notify the prospective LRD applicant that specified information in addition to the requirements of article 23, the following specific information should be submitted with any LRD application for permission for the proposed development:

The Planning Authority refers to your request pursuant to section 32 of the Planning and Development (Large Scale Residential Developments) Act 2021. Section 32D of the Act provides that the planning authority shall provide an opinion as to whether or not the documents submitted for the purposes of the meeting constitute a reasonable basis on which to make an application for permission for the proposed LRD.

Following consideration of the issues raised during the LRD meeting, the Planning Authority is of the opinion that the documentation submitted in accordance with Section 32B of the Act constitutes a reasonable basis for an application for Large-scale Residential Development subject to the applicant addressing the issues outlined below in any future application.

In the event that the applicant proceeds to submit a planning application, the Applicant is advised that the LRD application should be accompanied in the first instance by:

- Statement of response to the issues set out in the LRD opinion.
- Statement that in the applicant's opinion the proposal is consistent with the relevant objectives of the development plan for the area.

Furthermore, in accordance with Section 32D (a) and (b) of the LRD Act, the Applicant is hereby notified that the documents submitted constitute a reasonable basis on which to make an application subject to the issues raised below being addressed in any documents submitted in a future planning application.

Recommendations:

1. Planning Issues

- a) The applicant shall demonstrate how effective the proposed Stage 2 angled and louvre treatments to the eastern above-ground floor opes will be in ameliorating/redirection potential viewing cones eastwards towards the rear gardens and back of properties of St. Attracta Road. Noting the type of occupation involved it is considered that there is always more scope for application of ameliorating measures to a student scheme than say a standard residential scheme in terms of impacts on outlook. Further treatments/measures should be considered so as to contain 'overlooking' within the site as best as possible - notwithstanding the 'allowances' provided under the 2024 Compact Settlement Guidelines.
- b) A good quality brick treatment shall be used as primary finish on all new elevations – with overall a limited palette of high-quality materials to be applied throughout the scheme. Service doors and other external fittings shall be finished/treated to blend with their host finish as best as possible.
- c) Further enlivening of the front ground floor elevations onto the streetscape shall be considered in the interests of vitality of the local streetscapes. To provides for a much firmer urban edge onto the existing fragmented streetscape. Consideration of further works is required on proposed materials and planting – which should both order and soften the floorscape fronting the development – which will in turn help relieve the existing somewhat 'harsh' immediate streetscape.
- d) The Stage 3 application should demonstrate as to how the proposed scheme accounts for and/or overcomes any previous reasons for refusal on site.
- e) A study should be provided that compares the Stage 3 development to previous relevant baseline impacts upon the site and environs.
- f) A full daylight / Sunlight / Shadow study shall be submitted at Stage 3
- g) Any proposed signage shall be well designed
- h) The applicant should consider consulting the DAA and Air Nav Ireland if proposed solar panels/PV are to be cumulatively over 300m2.

2. Drainage:

- a) No attenuation tanks and Green/blue roofs are proposed are proposed which are welcomed.
- b) It was mentioned that there were discussions with Irish Rail regarding installing a pipe over the existing bridge, there does not seem to be a deep enough roadway within the bridge to install the pipe. The proposal is to now connect to the combined sewer. Further Information will be required to clarify this matter at Stage 3.
- c) Further Information regarding the exceedance, i.e., where the water will flow to in event of a blockage, should be added to the flood risk assessment.
- d) If infiltration is assumed on the permeable paving to the embankment side of the proposed development, this needs to be agreed with Irish Rail as it could potentially pose an issue.

- e) The proposed landscaping areas should tie into the permeable paving. Tree pits, raingardens, swales, should all connect with the permeable paving to add more biodiversity and interception storage.
- f) It shall be confirmed whether any part of this shall be taken in charge by DCC.
- g) In advance of the final application the applicant is advised to consult with the DPPDC section to ensure the above concerns are adequately addressed.

3. Transportation

The applicant is advised that the following points be addressed within the final LRD application documentation:

- a) Clarification is required on the exact location of the set down accessible car parking space
- b) A justification should be provided for the reduction in car parking spaces from stage 1 (5 no. spaces) to 1 no. space
- c) Details are required on proposed bicycle parking stands and locations
- d) A bicycle design statement is required
- e) Details are required on how servicing the site will take place – a service strategy is required. The preference is for servicing within the curtilage of the site. Auto tracking details are required for any servicing vehicles.
- f) Details of refuse and delivery vehicles access and egress and set down areas are required.
- g) Clarification on the public realm with regards taken in charge / privately managed (areas to the rear of the public footpath)
- h) Details are required on the works to the public roadway to incorporate the vehicular entrance. Is any pedestrian priority proposed, or tactile paving provided in order to aid pedestrian access across the site? Application site red line extending into the public roadway will require a Letter of Consent from DCC.
- i) A Transport Assessment is required and associated reports as outlined in Chapter 15 of the City Development Plan 2022-2028
- j) Clarification on how the vehicles will interact with pedestrians and cyclists, this will require a Stage 1 / 2 Road Safety Audit
- k) The areas for taken in charge should be indicated on taken in charge drawings

4. Parks, biodiversity & Landscaping issues

- a) A review of the Reactional Facilities shall be provided so as to include additional active recreational elements along the ground level circuit path and also Block B 5th floor roof
- b) Roof gardens: It is recommended that a continuous screen planter should be included on the east/residential side of the roof facilities to provide screening of existing residential areas.
- c) Public plaza: It is recommended that the surface material should be of natural stone, while the further use of large canopy tree species would be welcome
- d) Block A East Façade: It is recommended that vertical greening be applied to brick façades facing existing residential area to continue the green boundary approach to be considered.
- e) Bike/bin units: It is recommended that there is a coordinated façade design, e.g. wood plank finish in associated landscape setting
- f) The following documents are required to be submitted
 - Landscape Masterplan
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 - Open Space Key Plan with public and communal open spaces calculations and schedule of requirement and provision.

- Boundary Plan with details,
- Birds Eye CGIs over public open spaces
- Green Roof Plan with biodiverse planting
- AA Screening Report
- Ecological Impact Assessment (Include Invasive Species & Bat survey with roost survey assessment)
- A bio-diversity enhancement plan shall be provided (including details of 'bat friendly' lighting). The impact of artificial lighting on habitats, foraging species etc should be considered.

5. Archaeology

- a) A detailed desktop Archaeological Impact Assessment shall be provided at Stage 3. The Archaeological Impact Assessment should be prepared in consultation with the City Archaeologist and in accordance with the archaeological policies, objectives and standards in the City Development Plan (2022-8) and the *Framework and Principles for the Protection of the Archaeological Heritage* (Section 3.6 1999). The Archaeological Impact Assessment should take account of any sites listed on the Dublin City Industrial Heritage Record and provide an outline mitigation strategy for archaeological and industrial heritage, to be developed by the design team and archaeologist prior to construction.

Other Documents required as outlined above

The relevant required documentation as set out in Table 15.1 of the Dublin City Development Plan 2022 – 2028 Planning Application Documentation - Planning Thresholds shall be provided in addition to the specified reports requested above and as outlined in the applicant's Stage 2 Planning Letter.

Please Note:

Under section 32E of the Act of 2021 neither the taking place of an LRD meeting nor the provision of an LRD opinion shall prejudice the performance by the planning authority of its functions under this Act or any regulations under this Act or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.


 Brian Keane
 Acting Deputy City Planner