LARGE SCALE RESIDENTIAL DEVELOPMENT – LRD APPLICATION LRD6098/25-S3

PLANNING REPORT & STATEMENT OF CONSISTENCY

FOR ZONES 7, 8 & 9 AT LANDS AT CLONGRIFFIN, DUBLIN 13

BSM Est. 1968

Brady Shipman Martin

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Place Making **Built Environment**

Client

The Land Development Agency

Date

May 2026

DOCUMENT CONTROL SHEET

Project No. 7128
Client: The Land Development Agency
Project Name: LDA Clongriffin
Report Name: Planning Report & Statement of Consistency
Document No. RPRL01
Issue No. 04
Date: 11 May 2026

This document has been issued and amended as follows:

Issue	Status	Date	Prepared	Checked
01	Planning Report – LRD Opinion	15 Oct 2025	ST	PB
02	Planning Report – LRD Opinion Final	20 Oct 2025	ST	PB
03	Planning Report – LRD Application Draft	01 May 2026	ST	PB
04	Planning Report – LRD Application Final	15 May 2026	ST	PB

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1. INTRODUCTION

This Planning Report has been prepared in support of a Large-Scale Residential Development (LRD) Stage 3 Application to Dublin City Council (DCC) on behalf of The Land Development Agency (the 'applicant'). The subject application site (hereafter called 'the site') is located along Clongriffin Road in north Dublin, within the Clongriffin - Belmayne area. It forms part of the wider Clongriffin–Belmayne Strategic Development and Regeneration Area (SDRA) and is situated in close proximity to Clongriffin DART Station.

This LRD application falls under the definition of Large-Scale Residential Development as set out under Section 2 of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 (LRD Act 2021) as it is "*the development of 100 or more houses"* situated on residential zoned land.

The LRD Act 2021 requires prospective applicants to have:

- Had an initial consultation meeting with the planning authority pursuant to Section 247 of the amended the Planning and Development Act, 2000 (as amended) (the "Principal Act of 2000")
- Had a subsequent consultation meeting ('LRD Meeting') with the planning authority pursuant to Sections 32B and 32C of the amended Principal Act of 2000.
- Obtained an opinion ('LRD Opinion') from the Planning Authority in relation to the proposed large scale residential development pursuant to Section 32D of the amended Principal Act of 2000, inserted under Section 3 of the LRD Act 2021.

Pre-planning consultation meetings, as provided for under Section 247 of the Act, was held with Dublin City Council on 22nd July 2025 and 15th September 2025 (LRD6098/25). Subsequently an LRD Opinion Request was lodged with Dublin City Council on 21st November 2025 and an LRD Meeting was held on the 13th January 2026. An LRD Opinion was issued by DCC on 9th February 2026. The LRD Opinion concluded that:

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 2021 Act, requires further consideration and amendment to constitute a reasonable basis for an application for Large-scale Residential Development.

The proposed development, as now submitted for LRD Application, has taken account of the items raised by DCC in the LRD Opinion. This is addressed throughout the various consultant documents and drawings and in the Response to LRD Opinion Report.

The development for which an LRD application is being made, as set out in the Statutory Notices, is as follows:

The proposed development will consist of:

1. *The construction of a residential development with a gross floor area (GFA) of c. 73,641.91 sq.m set out in 3 no. residential blocks, ranging in height from 5 to 10 storeys, to accommodate 711 no. apartments, with associated ground floor retail/café/restaurant units and community/arts/cultural uses, and a standalone childcare facility. The site will accommodate a total of 335 no. car parking spaces and 1,605 no. bicycle parking spaces. Landscaping will include new public realm and communal courtyards at podium level. The proposed development sits as part of the wider Land Development Agency landbank at Clongriffin which includes the under-construction Blocks 5 & 6 to the north of Market Street (as permitted under LRD6064/24-S3).*

2. *The 3 no. residential buildings range in height from 5 to 10 storeys, accommodating 711 no. apartments comprising 50 no. studios, 304 no. 1-bed units, 351 no. 2-bed units (68 no. 2-bed (3P) & 283 no. 2-bed (4P)) and 6 no. 3-bed (5P) units. The breakdown of residential accommodation is as follows:*

    - *Zone 7 is a 5 to 7 storey building, including setbacks and balconies, accommodating 280 no. units (5 no. studios, 117 no. 1-bed units, 16 no. 2-bed (3P), 136 no. 2-bed (4P) and 6 no. 3-bed (5P) units). Communal Amenity Space of c.2,202 sq.m is provided at podium level. The ground floor includes for 1 no. community/cultural/arts unit of c.781 sq.m, ground floor own door residential units, cycle parking, waste stores and plant areas. It includes for below podium/undercroft parking in Zone 7 containing 130 no. car spaces.*
    - *Zone 8 is a 6 to 8 storey building, including setbacks and balconies, accommodating 263 no. units (29 no. studios, 106 no. 1-bed units, 21 no. 2-bed (3P) and 107 no. 2-bed (4P)). Communal Amenity Space of c.1,600 sq.m is provided at podium level. The ground floor includes for 2 no. community/cultural/arts units of c.199 sq.m and c.346 sq.m, ground floor own door residential units, cycle parking, waste stores and plant areas. It includes for below podium/undercroft parking in Zone 8 containing 82 no. car spaces.*
    - *Zone 9 is a 6 to 10 storey building, including setbacks and balconies, accommodating 168 no. units (16 no. studios, 81 no. 1-bed units, 31 no. 2-bed (3P), and 40 no. 2-bed (4P)). Communal Amenity Space of c.969 sq.m is provided at podium level. The ground floor includes for 2 no. retail/café/restaurant units of c. 140 sq.m and c.482 sq.m, ground floor own door residential units, cycle parking, waste stores and plant areas. It includes for below podium/undercroft parking in Zone 9 containing 40 no. car spaces.*

3. *A standalone two-storey crèche of c. 911 sq.m (with an external play area of c. 509 sq.m) is provided to the north of Zone 9 along Market Street and Clongriffin Road.*

4. *The proposed development also includes for the completion of the eastern section of Market St, which is currently under construction, to where it meets Clongriffin Road/Station Square. The remainder of Market St, north of Zone 8 and 9, will be a landscaped pedestrianised/cycle route, containing seating, external community/cultural space, cycle parking and planting.*

5. *The site will accommodate a total of 335 no. car parking spaces (317 no. for residents and 18 no. for visitors/crèche) and 1,605 no. bicycle parking spaces including cargo bikes, EV charging and shared bikes (1,193 for residents/staff and 412 no. for visitors) in separate secure below podium areas and at surface level. A total of 317 residents car parking spaces are provided with 252 spaces located below podium/undercroft and 65 spaces provided at surface level. A total of 1,178 no. resident's bicycle stores and 15 no. staff parking, including cargo spaces are provided at below podium/ground level within the blocks. In addition, 18 no. car parking spaces are located at surface level to include visitor, childcare facility parking, accessible and car club as well as 412 no. short stay bicycle parking spaces.*

6. *The proposed application includes all site landscaping works, green and blue roofs, lighting, servicing, signage, junction upgrades, ESB Substations, solar PV panels at roof level and all associated and ancillary works, including site development works above and below ground including site drainage and infrastructure.*

This report examines the site location, context, and planning history. It also has regard to issues of compliance with relevant legislation, the Dublin City Development Plan 2022-2028, Section 28 Guidelines, and other relevant guidance against which the development will be considered having regard to principles of proper planning and sustainable development.

This Planning Report should be read in conjunction with the other documentation (reports and drawings) accompanying this LRD Application, set out in the schedule included in the Cover Letter to DCC.

2. SITE LOCATION AND CONTEXT

The subject site is located along Clongriffin Road in the northern suburbs of Dublin, within the Clongriffin–Belmayne Strategic Development and Regeneration Area (SDRA). It occupies a prominent position immediately west of Clongriffin DART Station and forms part of a mixed-use urban quarter that is currently under phased development. The subject site lies within the Wider Clongriffin Lands which sit at the edge of the established Belltree and Clongriffin neighbourhoods and is constituted of 3 no. non-contiguous land parcels generally located to the north, west, and south of Clongriffin railway station (as per Fig. 2-1 below)



Figure 2-1 Wider Lands (in Red), Subject Site (in Yellow) and Phase 1 (in Dashed blue line) in Context (HJL)

The surrounding context is characterised by a mix of residential, educational, and recreational uses. To the west, the site is bound by the Belltree residential area, beyond which lies Father Collins Park, a significant public open space serving the wider community. To the east, the Clongriffin Railway Station provides direct access to Dublin city centre, enhancing the area's connectivity and supporting transit-oriented development. To the immediate north, the site adjoins permitted and currently under construction housing development, identified as Blocks 5 and 6, by the Land Development Agency (LRD6064/24-S3). To the south the site is bound by the Main Street. Further south lies residential and educational facilities such as Grange Community College and Gaelcholáiste Reachrann. The site is c. 350m south of the River Mayne and c. 1.2km west of the Baldoyle Estuary.

The wider Clongriffin area has been planned as a high-density, mixed-use urban centre, combining residential, retail, educational, and community facilities within a sustainable urban framework. The site benefits from close proximity to local services such, and is within walking distance of retail and community amenities in Clongriffin Town Centre. The combination of established infrastructure, public transport access, and surrounding green space positions the site as a key component in the continued development and consolidation of the Clongriffin–Belmayne urban area.

3. PLANNING HISTORY

The LDA Clongriffin Lands fall within the wider Clongriffin masterplan which was originally granted planning permission in 2003 and was updated in 2018 which formed the basis for recent SHD Planning Applications. There is a history of planning permissions for these lands all of which have expired.

The application site, and adjacent lands, have been subject to a number of planning applications in recent years as set out below.

BLOCKS 5 & 6 (DCC Reg. Ref: LRD6064/24-S3)
Planning permission was lodged by the Land Development Agency on 16th August 2024 to Dublin City Council under the Large-Scale Residential Development (LRD) process.

Permission was sought for a mixed-use residential development comprising two blocks (Blocks 5 and 6) providing a total of 408 no. apartments.

Block 5 ranges from 3 to 6 storeys and includes 138 apartments (58 one-bed, 78 two-bed, and 2 three-bed units). All apartments include private balconies/terraces. The block includes 879 sq.m of communal open space (736 sq.m at podium level, including play space, and 143 sq.m at roof level). At ground floor level, 502 sq.m of Community Arts and Cultural space is proposed. Parking provision includes 79 spaces (45 on-site, 34 on-street), 4 motorcycle and 290 bicycle spaces (220 resident, 70 visitor). Ancillary facilities include bin stores, energy centre, plant rooms, an ESB substation, and an on-street loading bay on Park Street.

Block 6 ranges from 4 to 7 storeys and includes 270 apartments (122 one-bed, 148 two-bed units), all with private balconies/terraces. Communal open space of 2,678 sq.m (including play areas) is provided in a central courtyard at podium level. Ground floor uses include 711 sq.m of Community/Arts and Cultural space and a 413 sq.m childcare facility with an ancillary play area of 125 sq.m. Parking provision includes 181 car spaces (118 on-site, 63 on-street), 9 motorcycle and 568 bicycle spaces (418 resident, 136 visitor, 14 childcare facility). Ancillary facilities include bin stores, energy centre, plant/tank rooms, two ESB substations, and a loading bay on Dargan Street.

The development includes associated public realm and infrastructure works comprising:

- New and extended streets including Dargan Street, Market Street (with a 315 sq.m multifunctional events space) and sections of Lake Street.
- A 1,433 sq.m landscaped public open space (“Grant Park”) located east of Lake Street.
- Street planting, public lighting, underground services and all associated site works.

Planning permission was granted by Dublin City Council on 27th November 2024 and has an expiry date of 10th January 2030 (allowing for Christmas period). This permission is the only current and valid permission on the LDA lands. The scheme has commenced construction and is due for completion in Q1 2027.

CLONGRIFFIN SHD 1 (ABP - 305316-19)
Planning permission was lodged in August 2019 to An Coimisiún Pleanala (previously An Bord Pleanala) under the Strategic Housing Development (SHD) process.

Permission was sought for 1,030 apartments over 9 blocks (678 of which were identified as BTR). The development would include two childcare facilitys with a total floor area of 926m2, a gym of 254m2 and 9 retail units with a total

floorspace of 1,105m2, 2,421m2 of shared facilities are proposed to support the 678 build-to-rent apartments. The gross floor area of the overall development is given as 78,742m2. The development would be in 9 blocks numbered 6, 8, 11, 17, 25, 26, 27, 28 and 29. A summary of the blocks is set out as follows:

- Block 29- 4 storeys, containing 20 apartments, 2 of which would be social housing under Part V. 20 car parking spaces at surface level on and off the street.
- Block 17- 6-17 storeys, containing 210 apartments built to rent. 75 car parking spaces all but 4 of which would be at basement
- level. 4 retail units with a total floor area of 430m2.
- Block 28- 7 storeys, containing 122 apartments. Gym of 254m2
- and 5 retail units with a total area of 688m2 on the ground floor. 112 car parking spaces. Communal open space would be provided on a podium over the car parking behind the building beside the railway.
- Block 11- 6 storeys, containing 98. They are proposed as social housing under Part V. Communal open space would be provided at the back of the building at ground level.
- Block 8- 8 storeys, containing 114 apartments. 103 car parking spaces. Communal open space would be provided at podium level over the car parking behind the building. A public open space of 1,200m2 would be provided to the south of the block.
- Block 25- 15 storeys, containing 78 BTR, 52 car parking spaces.
- Block 26- 8 storeys, containing 63 BTR apartments, 39 car parking spaces.
- Block 27- 6 storeys, containing 57 BTR apartments, a childcare facility of 508m2 on the ground floor and 27 car parking spaces.
- Block 6- 5 buildings up to 7 storeys, containing 270 BTR apartments, a childcare facility of 418m2 and 184 car parking spaces. Communal open space would be provided at podium in a courtyard over car parking. A public open space of 1434m2 would be provided to the south-east of this block.

The overall development would provide 673 car parking and 1,883 bike parking spaces at surface and basement level. The level of communal open space for the 9 blocks was stated to be 12,046m2. 2 public open spaces with a combined area of 2,634m2 were included.

The permission was granted by An Coimisiún Pleanala on 13th December 2019 and had an expiry date of 22nd March 2025 (allowing for Christmas period and covid period). Block 8 was omitted from the permission and conditioned to be reserved for a period of 5 years for a school.

CLONGRIFFIN SHD 2 (ABP - 305319-19)

Planning permission was lodged in August 2019 to An Coimisiún Pleanala under the Strategic Housing Development (SHD) process.

Permission was sought for 500 apartments over 3 blocks (265 of which were identified as BTR). The development would include a childcare facility of 304 m2, a community centre or men's shed of 417m2; 6 retail units with a total floorspace of 1,520m2; and 3 cafes with a combined floorspace of 884m2 and 1,309m2 of shared facilities are proposed to support the 265 build-to-rent apartments. The gross floor area of the overall development is given as 39,441m2.

The development would be in 3 blocks numbered 4, 5 and 14. A summary of the blocks is set out as follows:

- Block 4- 2 buildings of 2 and 6 storeys, with 74 BTR apartments. A childcare facility, a café and a community centre located at ground floor.
- Block 5- 3-7 storeys, with 138 apartments. Commercial uses at ground floor.
- Block 4- 2 buildings of 6 to 8 storeys, with 288 apartments. One building would contain 97 apartments provided as social housing under Part V, the other would have 191 BTR apartments.

The overall development would provide 357 car parking and 1,007 bike parking spaces at surface and basement level. The level of communal open space for the 3 blocks was stated to be 4,450m2. No public open space is provided.

The permission was granted by An Coimisiún Pleanala on 13th December 2019 and had an expiry date of 22nd March 2025 (allowing for Christmas period and covid period).

BLOCKS 3, 13 & 15 (DCC Reg. Ref: 3894/19)
Planning permission was lodged in August 2019 to Dublin City Council seeking permission for a mixed-use development (within 3 no blocks, i.e. Blocks 3, 13 and 15) comprising of 420 no. apartment of which 233 no. units are residential and 187 no. units are 'build to rent' with ancillary residential amenity facilities; 14 no. retail units, 1 no. 8 screen cinema, 4 no. cafes/restaurants and 10 no. floors of commercial office suites. A summary of the blocks is set out as follows:

- Block 3 containing a total of 141 no. residential apartments, in 3 no. buildings ranging from 5 to 6 storeys in height, with ancillary residential amenity facilities, 2 no. retail units at ground floor level with 5 no. floors of commercial office suites at first to fifth floor level.
- Block 13 containing a total of 187 no. residential build to rent apartments in 3 no. buildings ranging from 5-7 storeys in height, with ancillary residential amenity facilities as follows: games room, gym, conference room, amenity room, laundry, bulk store
- and guest suites; 6 no. retail units and 1 no. cafe/restaurant all at ground floor level, 5 no. floors of commercial office suites at first to fifth floor level.
- Block 15 containing a total of 92 no. residential in 2 no. buildings
- ranging from 3 to 6 storeys in height, with ancillary residential amenity facilities; 1 no. 8 screen cinema, 5 no. retail units and 3 no. cafes/restaurants at ground floor level, 1 no. retail unit split over ground and first floor level.

The proposed development provides for a total of 328 no. car parking spaces and 635 no. bicycle spaces all across surface and undercroft levels. Planning permission is also sought for landscaping, roads, footpaths, boundary treatments and all associated engineering and site works necessary to facilitate the development. An Environmental Impact Assessment Report has been prepared in respect of the proposed development.

The permission was granted by DCC on 20th March 2020 and has an expiry date of 27th June 2025 (allowing for Christmas period and covid period). This permission has now expired.

BLOCK 9- HOTEL SITE (DCC Reg. Ref: 2569/17)
Planning permission was lodged in August 2019 to Dublin City Council seeking permission for a hotel on the Block 9 site. The development included for the development of a building of 4 to 7 storeys containing 209 guest bedrooms, hotel bar/restaurant/front of house reception areas, main and secondary function rooms and meeting

rooms, kitchen/service/ancillary facilities, fitness suite, service and plant areas, 20 apartments (with balconies) for short term letting for holiday and business use, basement carpark, and associated facilities.

The permission was granted by DCC on 28th June 2017 and had an expiry date of 6th October 2022 (allowing for Christmas period and covid period). This permission has expired.

4. PRE-PLANNING CONSULTATION

4.1 PLANNING AUTHORITY

Both the context and approach to the application site and the design rationale for the proposed development, have been subject to consultation with the DCC Planning Department under Section 247 of the *Planning and Development Act 2000* (as amended). Pre-planning consultation meetings were held with Dublin City Council on 22nd July 2025 and 15th September 2025 (LRD6098/25), with an LRD Meeting held on the 13th January 2026, and further pre-planning occurring prior to lodgement of this LRD Application.

Specific issue meetings have also taken place with the Transportation Planning Department, Active Travel Unit, Drainage Department and North Fringe Area Office of Dublin City Council.

4.2 COMMUNITY ENGAGEMENT

As part of the pre-planning process the Land Development Agency undertook consultation with local community groups and residents. The process aimed to ensure that the proposed community/cultural/arts facilities, as required under CUO25, reflect actual local demand and are designed to support a diverse range of uses.

Consultation was undertaken, in June 2025 and February 2026, to gather community views on the scale, pace, and nature of proposed development. Feedback reflected strong aspirations for a balanced approach that delivers new housing alongside the timely provision of essential social infrastructure, transport upgrades, and local amenities. The key themes raised are summarised below and considered in further detail in the Community, Cultural, Arts & Social Infrastructure Report, which is submitted separately with the application.

- Infrastructure and Services Deficit
- Housing Mix
- Connectivity
- Commercial
- Green Space and Sustainability
- Community Safety
- Transparency and Phasing

These items have been considered in the finalisation of this LRD Application.

5. STATEMENT OF CONSISTENCY

The key provisions of national (including relevant Section 28 guidelines) and regional planning policy as it relates to the proposed development is set out in the following sections. A detailed consideration of the relevant polices of the Dublin City Development Plan 2022-2028 is contained in Section 6 of this Report.

5.1 NATIONAL AND REGIONAL POLICY

The key policy and guidance documents of relevance to the proposed development are as follows:

- Delivering Homes, Building Communities 2025-2030: An Action Plan on Housing Supply and Targeting Homelessness
- Project Ireland 2040 - National Planning Framework First Revision (April 2025)
- Climate Action Plan 2025
- Eastern and Midland Regional Assembly - Regional Spatial & Economic Strategy 2019-2031 (RSES)
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)
- Delivering Homes, Sustaining Communities (2008) and the accompanying Best Practice Guidelines - Quality Housing for Sustainable Communities.
- Planning Design Standards for Apartments, Guidelines for Planning Authorities (July 2025)
- Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)
- Design Manual for Urban Roads and Streets (2019)
- Guidelines for Planning Authorities on Childcare Facilities (2001)
- Transport Strategy for the Greater Dublin Area 2022-2042

5.1.1 DELIVERING HOMES, BUILDING COMMUNITIES 2025-2030: AN ACTION PLAN ON HOUSING SUPPLY AND TARGETING HOMELESSNESS

Delivering Homes, Building Communities 2025-2030: An Action Plan on Housing Supply and Targeting Homelessness is the latest Housing Plan prepared by Government. Launched in November 2025 it replaces the previous Housing for All Plan.

The plan targets the construction of 300,000 homes up to 2030, including 72,000 social homes and 90,000 affordable housing supports and there is no upper limit on housing delivery envisaged over the plan period.
The Plan sets out an approach to housing delivery focussed on 2 key pillars:

1. Pillar 1: Activating Supply
2. Pillar 2: Supporting People

The Plan identifies a key role for the Land Development Agency in delivery housing supply under the Plan with additional equity funding of €2.5 billion is to be provided to the LDA, bringing total funding to €8.75 billion. It sets out that the LDA are active on over 40 sites and working on a pipeline of 27,000 units which include the Clongriffin lands.

The Plan expands the remit of the LDA enabling them to operate in a wider range of towns to deliver mixed tenure communities including more social homes and private housing within larger developments. The LDA will also continue to develop State-owned lands and strategically assemble land from both public and private sources to create a more stable and affordable housing market.

The subject site has been acquired by The Land Development Agency with a view to delivering approximately 1,700+ homes altogether. Phase 1 which is under construction is delivering 408 no. residential units and Phase 2, which is subject of this LRD Application will deliver a further 711 no. residential units. These will be affordable (cost rental) homes delivered by the LDA.

5.1.2 PROJECT IRELAND 2040 - NATIONAL PLANNING FRAMEWORK (FIRST REVISION- APRIL 2025)

Project Ireland 2040 is the Government's plan to 're-imagine' Ireland and prepare for the future. The National Planning Framework (NPF) was initially published in 2018 and following a decision of Government in June 2023, the preparation of a revised National Planning Framework was commenced. This was completed in early 2025 with the Government approving the First Revision on 8th April 2025 and subsequently it was approved by both Houses of the Oireachtas.

Project Ireland 2040 seeks to achieve ten strategic outcomes (common to both Plans), building around the overarching themes of wellbeing, equality and opportunity, including:

1. Compact Growth
2. Enhanced Regional Accessibility
3. Strengthened Rural Economies and Communities
4. Sustainable Mobility
5. A Strong Economy, supported by Enterprise, Innovation and Skills
6. High-Quality International Connectivity
7. Enhanced Amenity and Heritage
8. Transition to a Low Carbon and Climate Resilient Society
9. Sustainable Management of Water and other Environmental Resources
10. Access to Quality Childcare, Education and Health Services

In April 2025, the Houses of the Oireachtas approved the adoption of the First Revision of the National Planning Framework which builds on the NPF which was initially drafted in 2018, to reflect the changing needs of Ireland in the time that has elapsed since. The revised NPF identifies that, as per updated projections, the population of Ireland will increase to approximately 5.7 million by 2030 and to 6.1 million by 2040, which is an increase of 250,000 people over that planned for in 2018. The scale of growth that is projected in Ireland to 2040 coupled with the need to transition to a lower carbon society requires an increased delivery of housing and the improved integration of land use and transport.

One of the key objectives of the NPF relates to compact growth. The plan seeks to carefully manage the sustainable growth of compact cities, towns and villages and to add value and create more attractive places in which people can live and work. The NPF identifies that activating *"strategic areas and achieving effective density and consolidation, rather than more sprawl of urban development"* (page 6) as a top priority.

With regards to Dublin the NPF identifies that the city needs to *"accommodate a greater proportion of the growth it generates within its metropolitan boundaries, while offering improved housing choice, transport mobility and quality of life"* (page 31).

Having regard to the proposed development, the following National Policy Objectives (NPO's), *inter alia*, are highly relevant:

- **NPO 4***: "A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs"*.
- **NPO 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"*.

- **NPO 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"*.
- **NPO 10***: "Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth."*.
- **NPO 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"*.
- **NPO 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."*.
- **NPO 37***: "Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages."*.
- **NPO 38***: "Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services."*.
- **NPO 43***: "Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location."*.
- **NPO 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."*.
- **NPO 67***: "Support the circular and bio economy including in particular through greater efficiency in land and materials management, promoting the sustainable re-use and refurbishment of existing buildings and structures while conserving cultural and natural heritage, the greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development."*.

The NPF notes that half of the future (50%) population and employment growth is to be included in the existing five cities and suburbs, including Dublin. The proposed development will provide 711 no. high-quality residential homes which will assist with the future growth of the city.

The proposed layout has been carefully considered to promote lower car usage given the site's location to high accessibility transport links. The proposed development will provide a safe and secure development designed in compliance with national, regional and local planning policy.

The development is being proposed by The Land Development Agency (LDA). In respect of the LDA the NPF includes NPO 21 which states that '*The Government will support the LDA, in association with Local Authorities, to fulfil its statutory mandate to deliver a significant number of homes on State lands in major mixed tenure developments, with a particular focus on brownfield and infill urban sites in the five main cities and regional centres as a priority'.*

The proposed development is considered consistent with the National Policy Objectives of the Planning Framework 2040 First Revision.

5.1.3 CLIMATE ACTION PLAN 2025

The Climate Action Plan 2025 (CAP25) is the fifth annual update to Ireland's Climate Action Plan 2019 and sets out the roadmap to deliver on Ireland's climate ambition. Climate Action Plan 2025 builds upon last year's Plan by

refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings. The Plan provides a roadmap for taking actions to reduce greenhouse gas emissions by 51% by 2030 and achieve climate neutrality by no later than 2050.
CAP25 strengthens Ireland's commitment to ensuring a just transition through its four-principle framework, focusing on evidence-based planning, skills development, equitable cost distribution, and social dialogue.

The Climate Action Plan 2025 includes set of Actions that will support the delivery of Ireland's climate action ambition. These actions are set across a range of chapters and disciplines. The proposed development has been designed to assist in achieving actions and policies as set out in the Climate Action Plan 2025 (CAP25).

In terms of transport, CAP25 pledges to adopt the 'Avoid – Shift – Improve' approach, and targets a 50% reduction in emissions by 2030. It also aims to:

- TR/25/7: Advance roll-out of walking/cycling infrastructure in line with National Cycle Network and Cycle Connects plans.
- TR/25/9: BusConnects Dublin: At least one Core Bus Corridor approved at Approval Gate 3 and start construction.
- TR/25/23: Prioritise the delivery of further phases of the BusConnects Network Design Plan.

With particular relevance to this residential development, CAP25 identifies that 'the residential sector is on track to meet its 2025 sectoral emissions ceiling'. In respect of actions in 2025 seeks to:

- BE/25/4 : Publish bill to transpose Energy Performance of Buildings Directive.

As such, the proposed development has taken into consideration the Climate Action Plan and measures have been included within the design of the development to reduce carbon emissions.

5.1.4 EASTERN AND MIDLAND REGIONAL ASSEMBLY – REGIONAL SPATIAL & ECONOMIC STRATEGY 2019-2031

The Regional Spatial and Economic Strategy (RSES) is a strategic plan and investment framework to shape the future development of the Eastern & Midland Region to 2031 and beyond. The region is the smallest in terms of land area but the largest in population size and is identified as the primary economic engine of the state.

The Strategy identifies that the region '*is home to over 800,000 households, with 4 out of 5 living in conventional housing while apartments account for around 18% or our housing stock. One of the challenges facing the region is the continued growth rates of household formation coupled with a severe slowdown in the development of new housing stock during the economic recession, resulting in housing supply and affordability pressures in both sale and rental markets, particularly in Dublin and urban areas but affecting all of the region'.*

The Strategy is underpinned by key principles that reflect the three pillars of sustainability; Social, Environmental and Economic, and expressed in a manner which best reflects the challenges and opportunities of the Region. The plan identifies that the central need is for the RSES to be people focussed, as 'quality of life' encapsulates strong economic output and stability, good environmental performance and a good standard of living for all.

The subject site is located within the Dublin Metropolitan Area (DMA), as designated by the Strategy. The Metropolitan Area Strategic Plan (MASP) which is part of the RSES seeks to focus on a number of large-scale strategic sites, based on key corridors that will deliver significant development in an integrated and sustainable

fashion. To achieve the overall vision the MASP identifies a number of guiding principles of sustainable development within the DMA including:

- *Integrated Transport and Land Use - To focus growth along existing and proposed high quality public transport corridors and nodes on the expanding public transport network and to support the delivery and integration of 'BusConnects', DART expansion and LUAS extension programmes, and Metro Link, while maintaining the capacity and safety of strategic transport networks.*

The NPF also sets out ambitious targets to achieve compact growth with 50% of housing to be provided within or contiguous to the built-up area of Dublin city and suburbs. To achieve this *'the MASP identifies strategic residential and employment corridors along key public transport corridors existing and planned, that contain development opportunities*.' The site is located in the 'North – South Corridor' strategic development corridor as designated by the Metropolitan Area Strategic Plan (MASP) which supports ongoing large-scale urban expansion.

Section 4.4 of the RSES supports continued population and economic growth in Dublin City and suburbs, with high quality new housing promoted and a focus on the role of good urban design, brownfield redevelopment and urban renewal regeneration. The RSES is further referenced in section 1.9.6 of the Dublin City Development Plan 2022-2028 (page 34) and notes that the MASP supports a sequential approach to residential development with a primary focus on the consolidation of sites within or contiguous to Dublin City and Suburbs.

Policy Objective relating to Housing Delivery include:

- **RPO 3.2:** *"Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built up area of Dublin city and suburbs and a target of at least 30% for other urban areas."*
- **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 project."*
- **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."*
- **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 Draft 'Urban Development and Building Heights Guidelines for Planning Authorities'.*
- **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 MASP identifies a 'Strategic residential and employment development corridors' in order to create sustainable compact communities with improved housing choice, access to social and economic opportunities, enhanced services and amenities for the residents of Dublin.

The subject site is well served by public transport with Clongriffin Railway Station within walking distance from the site. In addition, there are multiple bus services located within Bus Connects proposals. Four new bus routes are to run to and from Clongriffin Station. The D1 and D3 arterial routes and the N8 and L80 orbital/local routes will be within c.100m from the front of the site. In addition to these, it is proposed to extend the H1 arterial route, which currently runs between Dublin City Centre and Baldoyle, as far as Clongriffin Station. This is however contingent on the completion of a bus ramp over the railway line to provide a direct road connection between Station Square and Red Arches Road.

5.1.5 SUSTAINABLE RESIDENTIAL DEVELOPMENT AND COMPACT SETTLEMENT GUIDELINES FOR PLANNING AUTHORITIES (2024)

These Guidelines replace the *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009)* which in turn replaced the Residential Density Guidelines in 1999.

The Guidelines set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements.

Density

Since the publication of the Residential Density Guidelines 1999 and subsequent 2009 guidelines, planning authorities have been recommended to promote increased residential densities at appropriate locations. The 2024 Guidelines note that '*given the NPF priorities for compact growth […] , the Government considers that it is necessary to expand on the number of density bands contained in the 2009 Guidelines in order to ensure that densities are efficient while, at the same time, tailored to settlement context.*'

Table 3.1 of the Guidelines sets out the area and density range applicable to Dublin and Cork City and Suburbs. The subject site in Clongriffin is considered as 'City – Urban Neighbourhoods' as follows:

City - Urban Neighbourhood
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.

In terms of the above the site is identified as a *'(ii) strategic and sustainable development locations'* noting footnote 7 of the Guidelines which states *'Described in Section 4.4.4 of the Development Plans Guidelines for Planning Authorities 2022. The Dublin City Development Plan 2022-2028 details Strategic Development and Regeneration Areas in Chapter 13'*. The site is within an identified Strategic Development & Regeneration Area (SDRA).

The site can also be considered as being *(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.* In line with Table 3.8 the site can be

considered as being on a High-Capacity Public Transport Node or Interchange noting its proximity to BusConnects Core Bus Corridor No. 1 between Clongriffin Station and Dublin City Centre and Clongriffin Railway Station.

In this respect, a density of 206 dph will be achieved which complies with the density parameters 50 dph to 250 dph set out above. This is discussed further in Section 6 of this Report.

Section 5 of the Guidelines sets out development management standards which reinforces that the planning authority '*is required to have regard to the polices and objective of the Guidelines and to apply the specific planning policy requirements (SPPRs)'.*

The guidelines have introduced 4 no. SPPRs in relation to separation distances (SPPR 1), minimum private open space standards for houses (SPPR 2), car parking (SPPR 3), and cycle parking and storage (SPPR 4). SPPR 2 does not apply to the proposed development as it is applicable to houses only.

Further details on the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)* in relation to the proposed development is set out below in Section 6 of this Report.

5.1.6 PLANNING DESIGN STANDARDS FOR APARTMENTS GUIDELINES FOR PLANNING AUTHORITIES, 2025

In July 2025, the Minister for Housing, Local Government and Heritage issued the *Planning Design Standards for Apartments: Guidelines for Planning Authorities, 2025* ('the design standards') under Section 28 of the Planning and Development Act 2000, as amended. The design standards supersede the previous guidelines in relation to apartment design; *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2022 (updated July 2023)*, which are now revoked. These Guidelines are the subject of a judicial review however remain the relevant Guidelines that development should be assessed against.

The Guidelines are cognisant of the latest updates to the NPF and increasing pressure to accelerate the delivery of housing. The matters dealt with in the guidelines include apartment mix, internal space standards, dual aspect ratios, floor to ceiling heights, apartment to stair/lift core ratios, storage space, and amenity space.

Please refer to the *Housing Quality Audit* prepared by HJL for a detailed demonstration of the compliance of the proposed units with the relevant guidelines, design standards and SPPRs as appropriate.

The subject site represents a significant redevelopment of underutilised brownfield lands in Dublin and as such represents a project that is fully supported by these Guidelines.

Further details of the proposed development in accordance with the design standards are set out in Section 6 of this Report.

5.1.7 URBAN DEVELOPMENT AND BUILDING HEIGHTS GUIDELINES FOR PLANNING AUTHORITIES (DECEMBER 2018)

The Urban Building Height Guidelines identify that as reflected in *'the National Planning Framework …. that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas'* and that '*securing compact and sustainable urban growth means focusing on reusing previously developed 'brownfield' land, building up infill sites (which may not have been built on before) and either reusing* ***or redeveloping existing***

sites and buildings, in well serviced urban locations, particularly those served by good public transport and supporting services, including employment opportunities'.

The Guidelines reference NPO 13 (from the NPF) which states that *'in urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected'.*

It recognises that in meeting the challenge set out above new approaches to urban planning and development are required and that securing an effective mix of uses within urban centres is critical. To bring about this increased density and increased residential development in urban centres the Guidelines state that *'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'.*

It is considered that these Guidelines have been incorporated into the Dublin City Development Plan 2022-2028, in Appendix 3, and as such the Development Plan is the relevant criteria for assessment of the height and density proposed under this scheme.

Section 1.0 of Appendix 3 of the Development Plan states:

'The purpose of this Appendix is to set out guidance on how to achieve appropriate and sustainable compact growth in the city and specifically, to ensure consistency with the Urban Development and Building Heights Guidelines for Planning Authorities (December 2018) and the SPPR's contained therein. Guidance is set out regarding appropriate areas for increased density and height.'
Section 4.1 of Appendix 3 states:

'This section sets out a policy approach for the assessment of development of increased height, scale and density in the city that aligns with the Section 28 Guidelines. In accordance with the guidance set out therein and specifically SPPR 1, areas are identified where increased height will be supported. As per the requirements of SPPR 3, a series of performance based development management criteria are set out to ensure protection of residential, heritage, streetscape and landscape amenity. ***All proposals with significant increased height and density over the existing prevailing context must demonstrate full compliance with the performance criteria set out in Table 3'.***

The proposed scheme, as set out in this LRD Application seeks to achieve height and density in line with the SDRA Objectives. The site's suitability for this approach is set out in detail, as considered against Appendix 3 of the Development Plan, in Section 6.5 of this Planning Report.

5.1.8 DESIGN MANUAL FOR URBAN ROADS AND STREETS (DMURS) (2019)

The Design Manual for Urban Roads and Streets (DMURS) was adopted by the Department of Transport and the Department of Environment (now Housing) in 2013, and updated in 2019. It sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas. The Traffic & Transport Assessment, prepared by CS Consulting on the permitted development sets out how the scheme is in compliance with DMURS.

The scheme proposals are the outcome of an integrated urban design and landscaping to create lower traffic speeds through the development and thereby facilitating a safer environment for pedestrians and cyclists. CS Consulting along with the rest of the design team have interrogated the DMURS principles to ensure the layout provides a high-quality development which integrates with an established urban development.

The design aims to:

- Provide a connected network with strong permeability for pedestrians for the benefit of future and existing residents alike;
- Facilitate high levels of walking and cycling through prioritisation, shared space and the provision of quality infrastructure;
- Limit impact on the surround road network and enhance it as possible;
- Provide access to existing public transport networks in the area;
- Limit the impact on the surrounding area; and
- Ensure the safety of all users across all modes.

The Transport Assessment prepared by CS Consulting demonstrates that the roads layout and access arrangements have been designed to comply with the standards and principles set out in DMURS, as well as the National Cycle Manual and the DCC Development Plan and reflect the balance of modes accessing the site.

5.1.9 TRANSPORT STRATEGY FOR THE GREATER DUBLIN AREA 2022-2042

This strategy provides the framework for the planning and delivery of infrastructure and services in the Greater Dublin Area up to 2042 and replaces the previous Transport Strategy for the Greater Dublin Area 2016 – 2035. The framework aims to "To provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region's climate change requirements, serves the needs of urban and rural communities, and supports the regional economy". The transport measures encompass the strategy's principles of effective, efficient and sustainable transport whilst helping to reduce modal share of car based commuting to a maximum of 45%.

To achieve these principles, future developments must:

- Have transport as a key consideration in land use planning – integration of land use and transport as to reduce the need to travel, reduce the distance travelled, reduce the time taken to travel, promote walking and cycling especially within development plans;
- Protect the capacity of strategic road network;
- Ensure a significant reduction in share of trips taken by car, especially those trips which are shorter or commuter trips;
- Take into account all day travel demand from all groups; and
- Provide alternate transport modes in order to reduce strain on M50 as current increase in traffic is unsustainable.

The strategy also highlights how it is necessary for the expansion of attractive public transport alternatives to car travel, to reduce congestion and emissions and enable the transport sector to cater for the demands associated with longer term population and employment growth in a sustainable manner.

5.2 LOCAL PLANNING POLICY

The subject site is located within the administrative area of Dublin City Council. The Dublin City Development Plan 2022-2028 sets the statutory planning policy for development within the City Boundary, having regard to national

and regional plans and policies. The Development Plan provides the planning policy framework and design and development standards for development of the subject lands.

The proposed development supports the achievement of DCC Development Plan objectives in a number of key areas which are discussed below. The consideration of the scheme in respect of the relevant development management standards and specific relevant objectives, as set out in Chapter 15 of the Development Plan, in included in Section 6 of this Report.

5.2.1 STRATEGIC CONTEXT & CORE STRATEGY

The Development Plan sets out *'an integrated, coherent spatial framework to ensure our city is developed in an inclusive way which improves the quality of life for its citizens, and ensures that it is an attractive place to live, work and visit'*.

Section 1.2 outlines how to achieve this and the following is of relevance:

a) Social/Residential – creating a more compact city with a network of sustainable neighbourhoods (aligned with the principle of the 15 minute city) which have a range of facilities and a choice of tenure and house types, promoting social inclusion and integration of all ethnic/minority communities.

d) Cultural/Built Heritage – making provision for cultural facilities throughout the city and increasing awareness of our cultural and built heritage and promoting safe and active streets through the design of buildings and the public realm.

e) Urban Form – creating a connected, legible and liveable city with a distinctive sense of place, based on active streets, quality public spaces and adequate community and civic infrastructure.

f) Healthy Placemaking - ensuring quality architecture, urban design and green spaces to provide quality of life and good health and wellbeing for all.

The key data used to inform the preparation of the Cores Strategy as being:

- *Eastern Midland and Regional Assembly: Population Allocation for Dublin City Council (July 2020);*
- *Department Housing, Local Government and Heritage, Housing Targets for Dublin City Council (December 2020).*

Table 2-7 of the Core Strategy identifies 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. The housing demand calculated sets a requirement for the Development Plan to provide for approximately 40,000 housing units between 2022 and 2028.

Section 2.4.1 of the Core Strategy notes that Z14 lands have been identified as one of the nine zoning objectives which can accommodate residential development. Table 2-8 sets out the breakdown of zoned lands, and primarily accounting for SDRA zoned lands, which would include the subject lands. Table 2-9 sets out the capacity of existing zoned lands outside of SDRAs. The proposed residential development supports the achievement of Core Strategy targets.

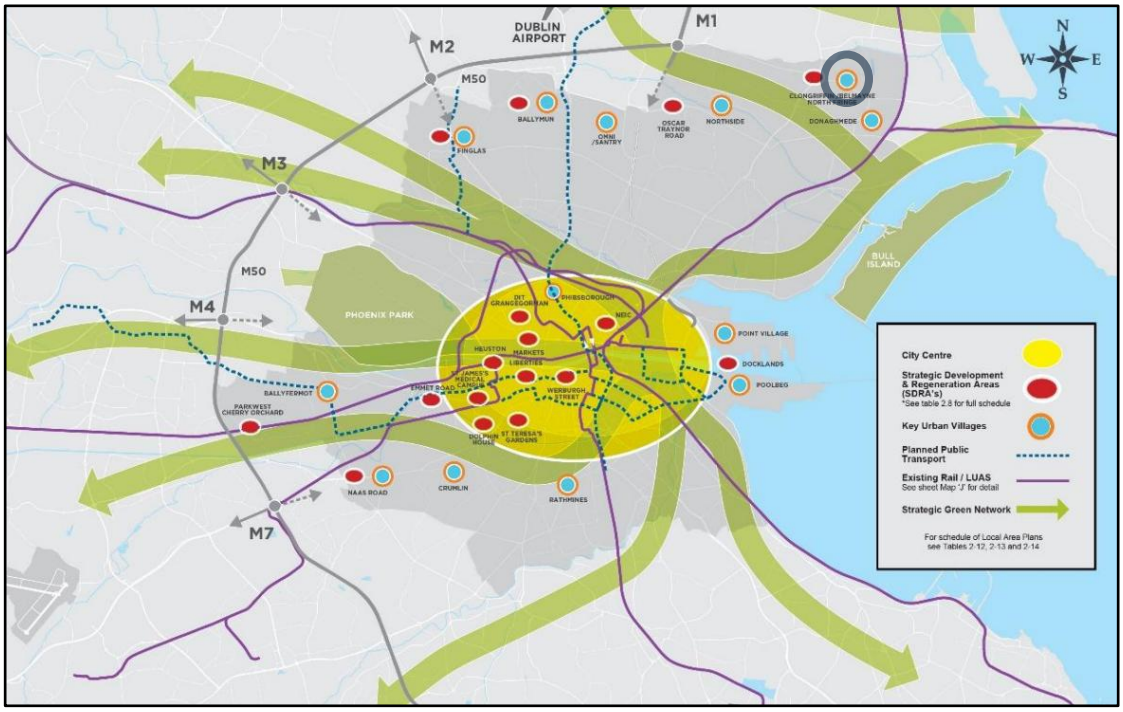


Figure 5-1: Development Plan Core Strategy Map- Site Indicated as SDRA & Key Urban Village (Source: DCC).

Overall the proposed development has had careful regard to the policies and objectives contained within the Development Plan. In particular the proposed development supports the achievement of Objective CS07:

> *CS07: 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.*

In summary, the proposed development supports the achievement of the Development Plan objectives, by providing high quality residential development in proximity to public transport corridors. This proposed development will foster a new community through its landscaped and open space strategy; mix of unit types and sizes; provision of community/cultural and retail facilities; and high-quality architectural design.

5.2.2 RESIDENTIAL DEVELOPMENT

Chapter 5 of the Development Plan relates to Quality Housing Objectives. The Development Plan identifies that the provision of quality homes which provide for the needs of the city's population, and which contribute to the making of good, connected neighbourhoods as a key priority. In this regard it is the policy of DCC:

QHSN10: To promote residential development at sustainable densities throughout the city in accordance with the core strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.

The Development Plan further notes that, in Dublin City, it is envisaged that the majority of new housing in the city area will be apartments or another typology that facilitates living at sustainable urban densities. With regards apartments, the DCC policies are as follows:

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.

QHSN38: To encourage and foster the creation of attractive, mixed use, sustainable residential communities which contain a wide variety of housing and apartment types, sizes and tenures, in accordance with the Housing Strategy and HNDA, with supporting community facilities and residential amenities. Further detail in regard to unit mix is set out in Chapter 15: Development Standards. Unit mix requirements for the Liberties and the North Inner City are set out in Section 15.9.1 and Table 37 of the Housing Strategy in Appendix 1

The scheme as proposed introduces a mix of residential unit types and sizes to a modern, developing residential suburb in Dublin City.

5.2.3 LAND USE ZONING

The subject site is zoned Z14 *'Strategic Development and Regeneration Areas (SDRAs)*', which has the stated aim "*To seek the social, economic and physical development and/or regeneration of an area with mixed-use, of which residential would be the predominant use'.*

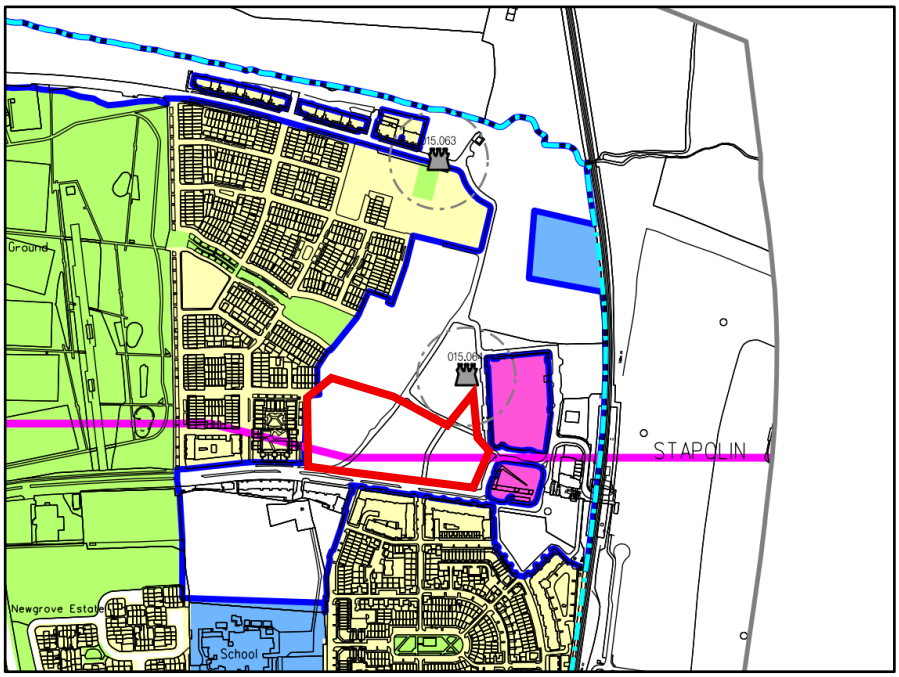


Figure 5-2: Development Plan Zoning Map-(Source: DCC). Subject lands in red

The development as proposed is compliant with the Z14 Zoning and provides for the regeneration of significant areas of brownfield lands, adjacent to public transport and proximate to the city. Lands directly adjacent forming part of the SDRA are identified as Z4- Key Urban Village. These blocks have been built out with a mix of uses.

5.2.4 BUILT HERITAGE

The Development Plan, in Chapter 11, sets out its role in '*valuing and safeguarding built heritage and archaeology for future generations*' and how '*The plan guides decision-making through policies and objectives and the implementation of national legislation to conserve, protect and enhance our built heritage and archaeology'*.

Policy BHA26 of the Development Plan deals with Archaeological Heritage and require as follows:

1. *'1. To protect and preserve Sites and Zones of Archaeological interest which have been identified in the Record of Monuments and Places and the Historic Environment Viewer (www.archaeology.ie).*
2. *To protect archaeological material in situ by ensuring that only minimal impact on archaeological layers is allowed, by way of re-use of standing buildings, the construction of light buildings, low impact foundation design, or the omission of basements (except in exceptional circumstances) in the Zones of Archaeological Interest.*
3. *To seek the preservation in situ (or where this is not possible or appropriate, as a minimum, preservation by record) of all archaeological monuments included in the Record of Monuments and Places, and of previously unknown sites, features and objects of archaeological interest that become revealed through development activity. In respect of decision making on development proposals affecting sites listed in the Record of Monuments and Places, the Council will have regard to the advice and/or recommendations of the Department of Housing, Heritage and Local Government.*
4. *Development proposals within Sites and Zones of Archaeological Interest, of sites over 0.5 hectares size and of sites listed in the Dublin City Industrial Heritage Record, will be subject to consultation with the City Archaeologist and archaeological assessment prior to a planning application being lodged.*
5. *To preserve known burial grounds and disused historic graveyards. Where disturbance of ancient or historic human remains is unavoidable, they will be excavated according to best archaeological practice and reburied or permanently curated.*
6. *Preserve the character, setting and amenity of upstanding and below ground town wall defences.*
7. *Development proposals in marine, lacustrine and riverine environments and areas of reclaimed land shall have regard to the Shipwreck Inventory maintained by the Department of Culture, Heritage and the Gaeltacht and be subject to an appropriate level of archaeological assessment.*
8. *To have regard to national policy documents and guidelines relating to archaeology and to best practice guidance published by the Heritage Council, the Institute of Archaeologists of Ireland and Transport Infrastructure Ireland.*

There are two recorded archaeological sites within the proposed development area, which comprise a burnt mound (DU015-096) and an enclosure (DU015-064001). No archaeological, architectural or cultural heritage potential impacts have been identified in relation to the proposed development area. The site has been fully stripped of topsoil and any archaeological remains were preserved by record in 2004. No architectural or cultural heritage sites are located within the site or the study area, which would be affected by the proposed development. This is considered in more detail in the EIAR Chapter 15- Cultural Heritage prepared by IAC, which accompanies this planning application.

5.2.5 COMMUNITY, SOCIAL & CULTURAL INFRASTRUCTURE

The Dublin City Development Plan 2022-2028 notes that the need for community and cultural offering will grow in tandem with the continuous growth in Dublin. As part of the Development Plan, a cultural infrastructure study of the city was undertaken, and the following polices are in place:

CUO25 – SDRAs and Large Scale Developments

All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area must provide at a minimum for 5% community, arts and culture spaces including exhibition, performance, and artist workspaces predominantly internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate*

vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need.
**Such developments shall incorporate both cultural/arts and community uses individually or in combination unless there is an evidence base to justify the 5% going to one sector.*

QHSN48 - Community and Social Audit

To ensure that all residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development. Refer to Section 15.8.2 of Chapter 15: Development Standards.

A Community, Cultural, Arts & Social and Infrastructure Report has been prepared by BSM which sets out how the proposed development responds to this objective. This is set out in detail in Section 6.8.

5.2.6 SDRA 1 – CLONGRIFFIN/BELMAYNE AND ENVIRONS

The Clongriffin/Belmayne and Environs Strategic Development and Regeneration Area (SDRA) focuses on creating a sustainable, mixed-use neighbourhood. The SDRA designation provides a coordinated framework for completing approximately 52 hectares of undeveloped land, aligning with the objectives of the City Development Plan and regional strategies (RSES and MASP) to promote compact growth within the Dublin Metropolitan Area. These lands are strategically positioned to deliver significant new residential and mixed-use development, particularly around Clongriffin's transport hub.

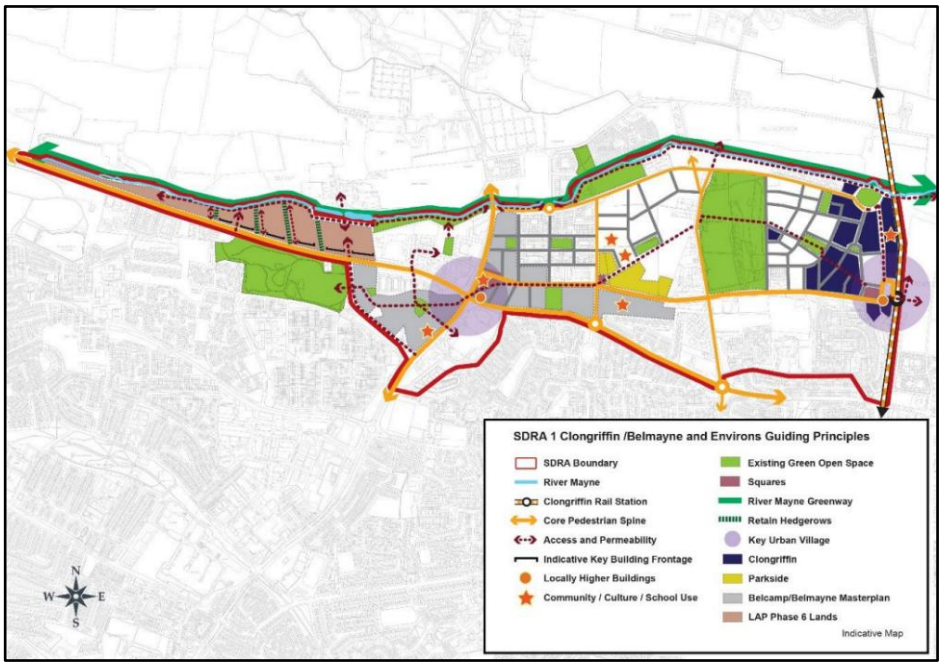


Fig 5-3 SDRA 1 Guiding Principles Map (Source: Dublin City Development Plan 2022-2028).

The proposed scheme is fully supportive of the SDRA Objectives. The development aligns with the SDRA Objectives and provides for an enhanced and optimised scheme, ensuring delivery of the specific objectives under the SDRA. This is considered further in Section 6.2.1.

6. PROPOSED DEVELOPMENT

6.1 CLONGRIFFIN MASTERPLAN FRAMEWORK

Since the granting of the previous SHD permissions for the Clongriffin Lands, the Land Development Agency has acquired the lands recognising the potential of the lands to deliver a significant number of new social and affordable homes within an area of high demand which is well served by local services and excellent public transport links. The previous permissions, expired in early 2025, shortly after the LDA acquired the lands, so as a result the LDA is now advancing the delivery of the lands through new planning applications. This commenced with the LDA obtaining planning for the delivery of Phase 1 of the Clongriffin Lands (Blocks 5 & 6) which are now under construction. This LRD Application now seeks to advance Phase 2 of the wider lands.

As set out in the Masterplan Framework, prepared by Henry J Lyons Architects, which accompanies this LRD Application, the subject site (relating to Zone 7, 8 & 9) sits within the wider Clongriffin Lands under the control of the LDA. The Framework Objectives include:

- **Develop an affordable, compact, and sustainable community** that is resilient and adaptive to climate change, fostering long term environmental and economic sustainability.
- **Create a vibrant, mixed-use neighbourhood** that is inclusive, diverse, accessible, permeable, and safe, promoting a high quality of life for all residents.
- **Provide attractive, well-designed, and high-quality homes** that are liveable and accessible, ensuring a mix of secure, affordable rental options and homes for sale to support future residents.

The Framework Masterplan has been guided by the SDRA Objectives, the existing and planned infrastructure, zoning restrictions and access to open space and the environment.

6.2 PROPOSED SCHEME RATIONALE & JUSTIFICATION

This section sets out the rationale and justification for the scheme when considered against some of the strategic and overarching objectives of the Development Plan including:

- Zoning & SDRA Objective
- Quality Housing

6.2.1 COMPLIANCE WITH THE ZONING & SDRA OBJECTIVE

As outlined above, Z14 lands and the Strategic Development Regeneration Area (SDRA), form the majority of the subject lands and have specific requirements and objectives that have to be met in the proposed development of residential on the lands.

In this section we have set out the development proposals and how they comply with the key aspects of both the overarching SDRA principles and the specific SDRA 1 objectives.

Architectural Design and Urban Design: *All development within the SDRAs must be of the highest architectural quality and adhere to the key architectural and urban design principles set out in Chapter 15 in order to create long term, viable and sustainable communities aligned with the principles of the 15- minute city.*

The site's design prioritises connectivity through integrated green routes and residential streets. All residential areas are within a 10-minute walk to key destinations. The proposal centres on consolidating and developing a

diverse mix of retail, commercial, and civic amenities. The goal is to create and reinforce a vibrant and dynamic central hub for the community.

The plan aims to reinforce the town centre as a focal point for:

- Social activities,
- Cultural life,
- Economic development.

The Main Street boulevard is designed to encourage people to meander, linger, and enjoy a vibrant setting. This will be achieved through landscaping measures such as wide pavements, street furniture, green spaces, and robust materials. Retail space is located along the street to promote public interaction and activity.

Lush planting and street furniture will create a biodiverse Market Street that connects residents with Father Collins Park. The green route links into existing green spaces, extending and strengthening the natural environment. Open spaces are incorporated into the streetscape to encourage social interaction, relaxation, and community gatherings. These green areas enhance both the liveability and attractiveness of the area. The design of the residential streets creates a safe, friendly, and well-connected environment for pedestrians, cyclists, and vehicles. Carefully considered north–south alignments and enhanced public spaces ensure pleasant streets that enable community interaction. The overall layout supports a well-connected neighbourhood.

The residential podiums in each zone will provide high-quality communal open spaces for residents. These will be accessed directly at podium level from either the core or shared corridor. Landscaped spaces will include robust planting, seating, and play areas. The podiums are designed as an integral part of the overall development. The proposed block footprints and urban form has been designed in mind with the existing services already in-situ, to minimise disruption and cost associated with diversion of existing services during the future construction of phases at the Wider Lands. The footprint of the blocks works with this approach as a coordinated strategy.

Phasing: *Large scale development proposals should be developed in accordance with agreed phasing plans to ensure that adequate social and physical infrastructure is delivered in tandem with development.*

The area of the wider lands, subject to his LRD Application, is designated as Phase 2, with Phase 1 having been permitted and under construction. Future development areas are preliminarily outlined but remain flexible to accommodate evolving requirements.

- **Phase 1:** Blocks 5 & 6 - currently under construction.
- **Phase 2:** Southern Sector- Development of Apartment buildings in the southern sector of the site. Zones 7, 8 & 9 submitted to DCC (this application).
- **Phase 3:** Northern Sector- Low-rise residential typologies in the northern sector, along the crescent of the pond. Affordable purchase homes for families. Zones 1, 2, 3 & 4 to be submitted to DCC.
- **Phase 4:** Indicative.
- **Phase 5:** Indicative.

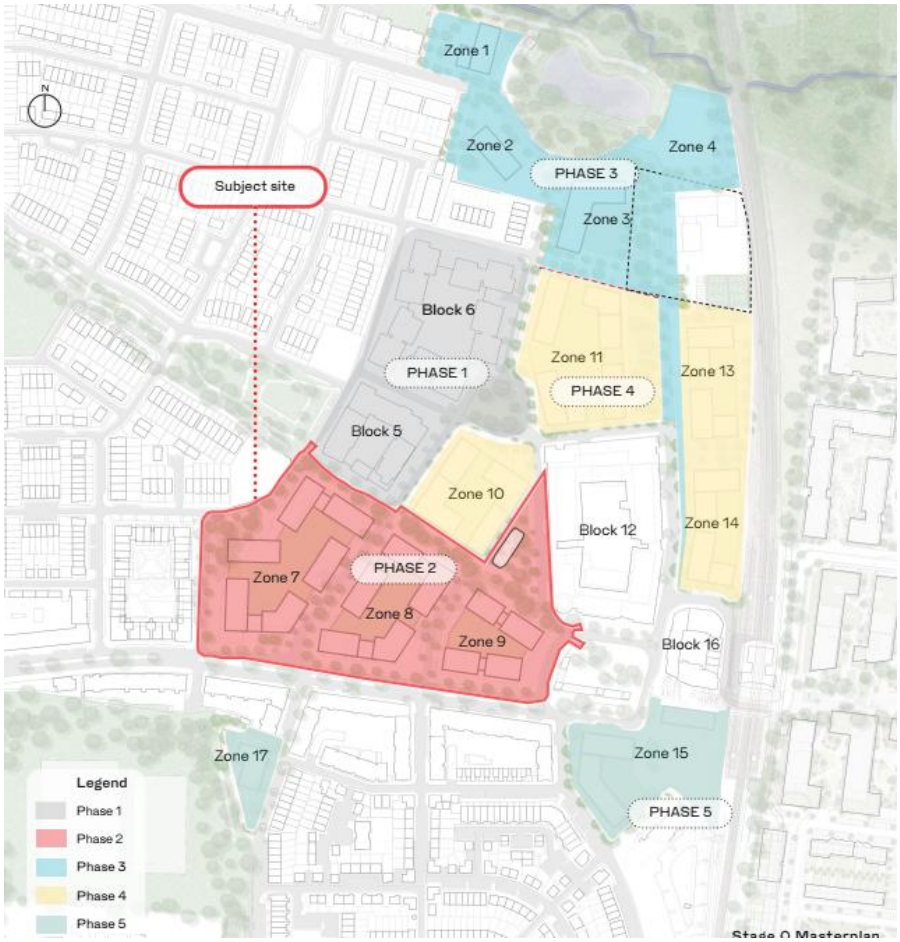


Fig 6-1 Proposed Wider Lands Phasing Plan (Source: HJL, 2026)

Access and Permeability: *Development proposals should ensure adequate permeability and connectivity to surrounding neighbourhoods and public transport infrastructure through the provision of high quality, accessible public realm and high-quality walking and cycling infrastructure. Access and layout should accord with the principles of DMURS.*

The site's design prioritises connectivity through integrated green routes and residential streets, with a hierarchical road network (primary, secondary, tertiary) and 30km/h design speeds in residential areas. Strategically positioned parking facilities minimise surface parking. Planned service and emergency vehicle access routes and dedicated drop-off zones near key facilities are incorporated into the design. Safe, interconnected pathways with minimum 2m-wide footpaths are provided for, and all residential areas are within a 10-minute walk of key destinations. In addition, accessible design with gentle gradients and clear wayfinding, and strategic crossings with traffic calming measures which prioritise pedestrians and create safe routes for crossing roads, with traffic calming measures are integrated into the road layouts. High-quality public spaces encourage walking. A comprehensive network of cycle paths connects to Dublin's wider cycling system. Dedicated, segregated cycle lanes (minimum 2m wide) are provided on main routes, with secondary connections through residential areas, and cyclist-priority features at junctions. Abundant bicycle parking is provided throughout the development.

On the local streets, we have incorporated building entrances, cycle access points, and ground-floor units with their own dedicated outdoor spaces. This design not only animates the public realm but also improves natural surveillance throughout the development. Cycle storage is integrated into the building's ground floor, offering direct access from the public street and ensuring it is close to building entrances for improved security. Additionally,

the proposed childcare facility and its outdoor play area are ideally located along Market Street. This location serves a dual purpose: providing natural surveillance and creating a sunny, sheltered outdoor play area for children.
Bin storage areas are accessed directly from the street with staging areas in close proximity to both the stores and road edges. ESB substations have also been located to ensure that the required vehicular access has been implemented in the design. The loading strategy for the non-residential spaces will include loading bays at street level to minimise any vans or trucks stopping dangerously and blocking streets for residents to access.

Height: *Guiding principles regarding height are set out for each SDRA. Where development adjoins lower scaled residential communities, development must be appropriately designed so that no significant adverse impacts on the residential amenities of adjacent residential properties arises. The performance criteria set out in Appendix 3 should be adhered to for developments of significant scale and/or density*

The residential blocks are strategically arranged in a north-south orientation, facing on to Main Street and Market Street, to minimise the number of north-facing apartments, thereby maximising sunlight exposure and enhancing the quality of life for residents. The design of the blocks follows the LDA's typical block typologies, featuring a regular and rational architectural language that promotes consistency, efficiency, and a cohesive urban aesthetic. Heights are concentrated around the town centre, main streets and green avenues. Heights have been reduced locally to enhance daylight in central communal courtyards. Blocks in more sensitive locations have been further scaled down to align contextually with the existing surroundings. Building heights range from 5 – 10 storeys. The taller buildings (8-10 storeys) are located to Zones 8 and 9. Zone 7 ranges in height from 5-7 storeys.

Urban Greening and Biodiversity: *Development proposals within the SDRA must ensure the integration of greening and biodiversity measures including high quality public open space as well as micro greening measures including green walls, green roofs, parklets etc. In general, unless otherwise specified under a separate LAP/SDZ Planning Scheme/other statutory plan policy/objective or site-specific guiding principle, a minimum of 10% public open space should be provided as part of all development proposals in SDRAs. A financial contribution in lieu of same will only be considered in exceptional circumstances.*

The Clongriffin Masterplan Framework promotes the enhancement of the urban environment, creating interconnected green spaces that support ecological and social functions. Tree planting and green corridors which are part of the phase 2 delivery will enhance biodiversity, improve air quality, and promote wildlife movement. The use of native plants reduces maintenance and preserves the area's natural character, contributing to climate resilience, water management, and community well-being.

Having regard to the historic planning strategy for Clongriffin, it is noted that there are two remaining pocket parks to be delivered on the infill lands to comply with the overall Clongriffin lands requirement for 10% public open space, which falls outside of Phase 2 red line boundary:

- Grant Park will be delivered as part of the blocks 5 and 6 which is currently under construction.
- Railway Park as noted on the plan is proposed to be slightly relocated to the linear park, which runs north-south to better align with the masterplan design. This will be delivered as part of the future phases by the LDA.

This is considered in more detail in Section 6.3.10 below.

Surface Water Management: *All development proposals should provide for sustainable surface water management including climate change provisions and the installation of sustainable drainage systems (SuDS) in order to reduce surface water runoff and potential flooding. This should be considered in conjunction with open space design and green infrastructure, biodiversity initiatives and nature based solutions.*

Within the Clongriffin masterplan area, a local surface water drainage network was designed and constructed under the masterplan parent permission (Reg. Ref. 0132/02). These local surface water sewers remain under private ownership. All runoff collected by this network drains to the Clongriffin attenuation pond, which is located adjacent to the Mayne River, at the northern boundary of the masterplan area.

In the immediate vicinity of the subject development site, the local surface water drainage network includes surface water sewers along the existing extents of Belltree Avenue, Lake Street, and Park Street, as well as along the intended future alignment of these streets' as yet incomplete sections.

Based on the adopted attenuation storage strategy the proposed development shall include the following proposed Sustainable Drainage Systems (SuDS) measures. The proposed Sustainable Drainage Systems (SuDS) measures will be designed in accordance with the requirements of Dublin City Council and the Dublin City Development Plan objectives, to provide on-site first stage interception of surface water run-off, improving its overall quality prior to ultimate discharge. The SUDS plan includes:

- Blue Roofs
- Green Roofs
- Permeable paving
- Tree pits and bio-retention area
- Rain gardens and planter boxes

This is set out in detail in the Surface Water Management Plan prepared by CS Consulting.

Flood Risk: *All development proposals within the SDRA's will have regard to restrictions / measures to mitigate identified flood risk outlined in the Strategic Flood Risk Assessment (SFRA) and in particular, Appendices A, B and C including climate change provisions in the SFRA.*

A Site-Specific Flood Risk Assessment has been prepared in accordance with the requirements of the national flood guidelines and Dublin City Council's Development Plan. Its conclusions are summarised as follows:

- The subject site historically has no recorded flood events, as noted in the OPW's historical flood maps.
- Predicted flood hazard mapping for fluvial flood events shows that the development site is at low risk of flooding from this source.
- Predicted flood hazard mapping for coastal and pluvial flood events show that the development site is at low risk of flooding from these sources.
- The proposed development is in an area for which the risk of groundwater flooding is considered low.

The proposed development is deemed to be suitable for the site location, as historical and potential flood routes have been reviewed and the likelihood of the development being subject to flooding is low.

River Restoration: *Opportunities for enhanced river corridors are applicable to the following Strategic Development and Regeneration Areas (SDRAs) in order to harness significant opportunities for river restoration where feasible.*

The Phase 2 Lands do not sit adjacent to the River Mayne corridor and as such do not provide for river restoration nor does the proposed development negatively impact on the river corridor. The wider site lands do engage with

the River Mayne and future phases of development will be located adjacent to the river corridor and will address river restoration and enhancement of the river corridor.

Sustainable Energy: *Climate Action Energy Statements for significant new residential and commercial developments, in Strategic Development and Regeneration Areas (SDRAs), will be required to investigate local heat sources and networks, and, where feasible, to demonstrate that the proposed development will be 'District Heating Enabled' in order to facilitate a connection to an available or developing district heating network.*

Climate Change: *Proposed developments within the SDRA shall be required to apply innovative approaches to energy efficiency, energy conservation and the use of renewable energy in order to contribute to achieving zero carbon developments.*

A Climate Energy Statement is submitted as part of the LRD Application setting out the schemes approach to energy efficiency, and climate adaption.

Cultural Infrastructure: *All new regeneration areas (SDRAs) and large-scale development above 10,000 sq. m. in total area must provide at a minimum 5% community, arts and culture predominantly internal floorspace as part of their development.*

The total amount of community, arts and cultural space provided (c. 1,328 sq.m) equates to a total of c. 3.05% of the overall net residential floor area (c. 43,982 sq.m) based upon the requirement of DCC in the LRD Opinion (Planning Item 1) to *'provide 50% of the required CUO25 provision attributable to this phase of development within Blocks 7, 8, & 9 and the remaining 50% shall be allocated elsewhere within the Clongriffin area'.*

Site Specific SDRA Objectives

Section 13.3 of the Development Plan sets out the objectives for the Clongriffin/Belmayne and Environs SDRA It notes that the long-term vision for Clongriffin – Belmayne was first set out in the North Fringe Area Action Plan in 2000. A Local Area Plan was made in 2012 and subsequently extended in 2017. The overall SDRA structure is based on a connected urban framework linking Clongriffin and Belmayne through Main Street, complemented by greenways, parks, and new road infrastructure.

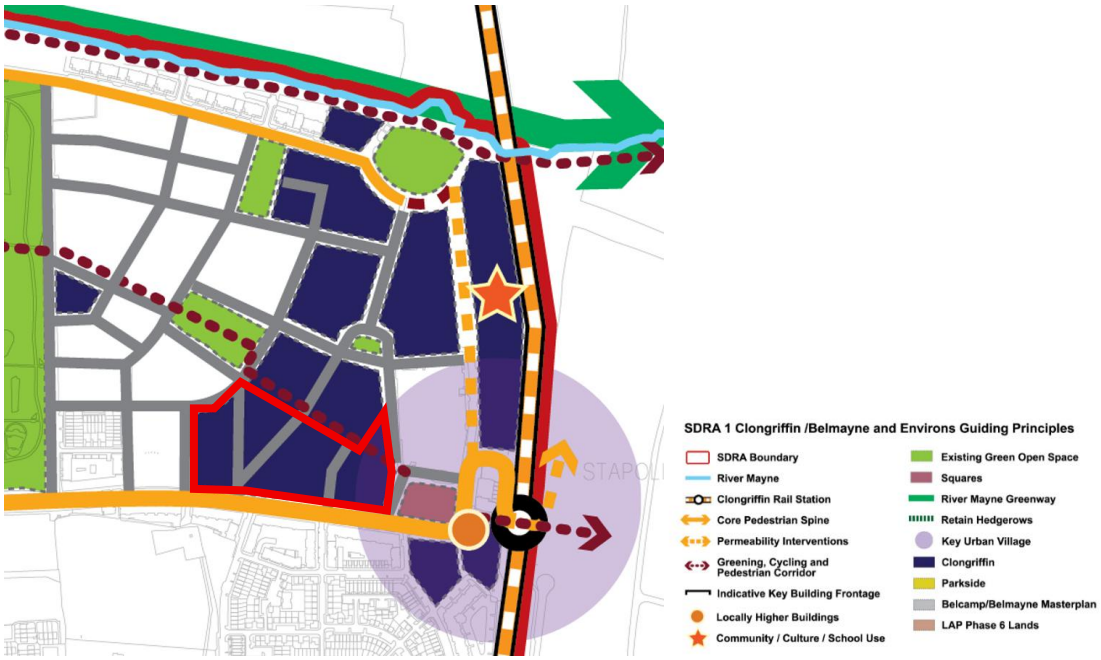


Fig 6-2 SDRA 1 - Clongriffin/Belmayne and Environs SDRA – Extract (Source: Dublin City Development Plan 2022-2028). (Subject Lands identified in red)

Key relevant objectives of the SDRA, relating to the subject lands, have been extracted and responded to as follows:

Urban Structure

- *Completion of Clongriffin KUV centre to include the development of key sites adjacent to the train station, east of Father Collins Park.*

The subject lands, identified as Phase 2, provides for the completion of the eastern side of Station Square. It also allows for the completion of Market St providing a key link from Father Collins Park, through Belltree and to Clongriffin Station.

- *Enhance and improve connections between Clongriffin and Baldoyle/Stapolin lands across the railway line at Clongriffin Train Station and at the River Mayne, in coordination with Fingal County Council.*

The subject lands, through providing for a western edge of Station Square and the completion of Market St will enhance connectivity from the wider Clongriffin to Clongriffin Train Station and to the Baldoyle/Stapolin Lands. This is set out in Section 6.0 of the Architects Design Statement. As DCC will be aware, the LDA are also in control of the Baldoyle/Stapolin lands and are advancing the delivery of these lands. As such the enhanced connectivity between the two landbanks are of key importance to the LDA in advancing both sites.

- *Urban Form and Block Layouts shall be arranged in a perimeter block configuration and shall form a continuous urban edge with the street in order to create enclosure, provide passive surveillance and animation. Typical block widths shall generally be in the range of between 45-50 m (lower scale housing) to 55-60 m (higher scale apartments). This will enable suitable separation distances to be achieved between the rear of blocks, as well as providing for private open space.*

The blocks are arranged in a perimeter configuration around central communal spaces at podium level. The bringing of communal spaces to podium level gives them a sense of enclosure and allows parking to be maximised within the building footprint thus allowing the street to be activated by own door units and active uses.

Land Use & Activity

- *A rich mix of uses to include retail, commercial, community, employment and residential uses will be sought on these lands, relative to the two KUV centres. At Belcamp the development will be primarily residential with a mix of typologies and tenures supported by community and social infrastructure. Commercial uses will be located along the Malahide Road and around the Town Squares at the Malahide Road junction.*

Acknowledging the extensive amount of commercial and retail space provided for in existing Blocks in the town centre, the proposed scheme seeks to complement rather than compete with these uses providing for a mix of retail unit sizes interspersed with community/cultural/arts spaces. It is considered that this mix will enhance future offerings in the larger floorplate units in the adjacent Block 12 and can provide for more local service needs.

- *Residential densities shall be highest within the two KUV centres and along Main Street, in proximity to the train station at Clongriffin and along the proposed Core Bus Corridor.*

As set out in the Masterplan Framework, the lands subject of this LRD Application, are the denser of the schemes proposed for the wider Clongriffin Lands. As other phases are developed, which move north from the train station, more gradual reduction in densities will occur with lower-level apartments, adjacent to the existing 2-3 storey housing. Given this sites proximity to the KUV, and critically forming the western edge of Station Square, density and heights have been maximised, in line with relevant residential and daylight standards, to provide for a greater level of accommodation and focal buildings.

- *Reserve a school site at Clongriffin, subject to the requirements of the Department of Education and Skills.*

The proposed development does not contain any of the Z15 lands, identified for a future school site, which are contained within a future development phase. As identified in the Masterplan Framework, the zoning for the school site within the Z15 lands is being maintained in accordance with the Development Plan, with ongoing discussions with the Department of Education and Youth, to align the site's potential with their requirements. The BusConnects D3 route and existing services significantly influence the design of the overall masterplan, shaping accessibility, connectivity, and infrastructure. Their impact on the Z15 lands is a key consideration, ensuring the site is integrated into the broader framework and prepared for future development.

Heights

- *Building heights shall respond to the proposed urban structure and land uses and activities. In general, the KUV centres at Belmayne Town Centre and Clongriffin Train Station shall contain the greatest building heights, in order to reinforce their status as a KUV, subject to amenity and design safeguards.*

As set out in the Architects Design Statement, the residential blocks are strategically arranged in a north south orientation to minimise the number of north-facing apartments, thereby maximising sunlight exposure and enhancing the quality of life for residents.

- Heights are concentrated around the town centre, main streets and green avenues.
- Heights have been reduced locally to enhance daylight in central communal courtyards.
- Blocks in more sensitive locations have been further scaled down to align contextually with the existing surroundings

- *Gateway buildings form a key structuring element, enhancing legibility and avoiding the proliferation of monolithic heights. As such, locally higher buildings shall be located within the KUV and along the Belmayne-Belcamp link, as illustrated.*

The taller building, proposed at 10 storeys, is located on the western edge of Station Square. Putting a prominent building at the Station Square and Main Street junction helps to enhance legibility at Clongriffin Town Centre.

- *The following building heights shall be applied:*
  - *Minimum heights of 5 storeys to the Key Urban Village centres at Clongriffin Rail Station and Belmayne Town Centre at the R139/R107 junction.*
  - *Minimum heights of four to five storeys for Main Street Boulevard.*
  - *A locally higher building adjacent to the rail station and at the junction of Malahide Road / R152.*

The proposed development is compliant with the building heights set out, with a minimum of 5 storeys proposed rising to predominantly 7/8 storeys and one taller element of 10 storeys adjacent the KUV and train station. The massing strategy adopts a gradual transition in building heights, with higher buildings concentrated towards the town centre and lower buildings positioned near the adjacent existing houses. This approach ensures a balanced urban scale, maintaining the prominence of the central area while respecting the character and privacy of existing residential neighbourhoods.

- *Any proposed height must have regard to existing neighbourhoods and character, in order to protect residential and visual amenity.*

As identified blocks in more sensitive locations, i.e. adjacent to lower rise housing to the west, have been scaled down to align contextually with the existing surroundings. Daylight and sunlight studies on these units show no adverse impacts.

Design

- *Architectural treatment shall be of the highest quality and allow for a range of building types and designs, creating a visually coherent urban form.*

As set out in the Architect's Design Statement the design intent for Clongriffin sets out a cohesive vision for a vibrant and resilient urban neighbourhood. Building massing is carefully arranged to create a legible streetscape, balancing scale and proportion while establishing a clear hierarchy of spaces and connections.

A robust material palette of brick, metal, and natural finishes anchors the architecture, chosen for durability, sustainability, and low maintenance. Variations in brickwork bring character and identity, while metal balconies and architectural detailing add depth and refinement to facades. The ground floor design plays a pivotal role in activating the street. Retail and food & beverage units create continuous engagement and vibrancy, with well-defined entrances to apartment blocks emphasising accessibility, security, and a strong sense of address.

The public realm draws together buildings and landscape into a coherent whole. Landscaped streets, green spaces, and podium gardens prioritise pedestrians and cyclists, integrating seating, planting, and SuDS features to foster social interaction and environmental comfort. Together, these elements combine architecture, materials, and landscape into a unified design that enhances daily life and strengthens the identity of Clongriffin.

Green Infrastructure

- *Tree planting, landscaping and SuDS features will be integrated into the urban structure and movement framework for the SDRA lands. Key green links shall provide additional landscaping in order to accentuate their strategic importance as amenity, sustainable movement and biodiversity corridors.*
- *All future developments shall comply with the SuDS Strategy outlined in the 2020 Masterplan.*

Based on the adopted attenuation storage strategy the proposed development shall include the following proposed Sustainable Drainage Systems (SuDS) measures. The proposed Sustainable Drainage Systems (SuDS) measures will be designed in accordance with the requirements of Dublin City Council and the Dublin City Development Plan objectives, to provide on-site first stage interception of surface water run-off, improving its overall quality prior to ultimate discharge. The SUDS plan includes:

- Permeable paving
- Tree pits and bio-retention area
- Rain gardens and planter boxes

This is set out in detail in the Surface Water Management Plan prepared by CS Consulting.

6.2.2 QUALITY HOUSING

The proposed scheme provides for 711 no. residential units, which by unit mix is as follows:

		No.	%
Unit Mix	Studios	50	7.0%
	1 bed 2 person	304	42.8%
	2 bed 3 person	68	9.6%
	2 bed 4 person	283	39.8%
	3 bed 5 person	6	0.8%
	Total	711	100.0%

Fig 6-3: Overall Unit Mix

The Development Plan identifies the provision of quality homes which provide for the needs of the city's population, and which contribute to the making of good, connected neighbourhoods as a key priority. In this regard it is a policy of DCC:

QHSN10: To promote residential development at sustainable densities throughout the city in accordance with the core strategy, particularly on vacant and/or underutilised sites, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.

Additionally, the Development Plan is centred around the premise of the 15 Minute City which is considered to be of relevance to the Clongriffin Lands.

QHSN11: To promote the realisation of the 15-minute city which provides for liveable, sustainable urban neighbourhoods and villages throughout the city that deliver healthy placemaking, high quality housing and well designed, intergenerational and accessible, safe and inclusive public spaces served by local services, amenities, sports facilities and sustainable modes of public and accessible transport where feasible.

The Development Plan further notes that, in Dublin City, it is envisaged that the majority of new housing in the city area will be apartments or another typology that facilitates living at sustainable urban densities. With regards apartments, the DCC policies are as follows:

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.

QHSN38: To encourage and foster the creation of attractive, mixed use, sustainable residential communities which contain a wide variety of housing and apartment types, sizes and tenures, in accordance with the Housing Strategy and HNDA, with supporting community facilities and residential amenities. Further detail in regard to unit mix is set out in Chapter 15: Development Standards. Unit mix requirements for the Liberties and the North Inner City are set out in Section 15.9.1 and Table 37 of the Housing Strategy in Appendix 1

Future population growth potential is strongly linked to a future consented planning pipeline. Both housing and population density within the existing 2km catchment of the Grange B Electoral Division (Clongriffin Site) are significantly lower than the core city centre area, and the targeted densities for the wider city.

The LDA has recognised the potential of the site to deliver a significant number of new social and affordable (cost rental) homes within an area of high demand which is well served by local services and excellent public transport links.

6.3 RESIDENTIAL DEVELOPMENT STANDARDS

The proposed development is fully in compliance with the Dublin City Council Development Plan Standards, as set out in Chapter 15. Since the adoption of the Development Plan the *'Planning Design Standards for Apartments- Guidelines for Planning Authorities, July 2025*' ["*the 2025 Guidelines"*] has replaced the *Sustainable Urban Housing: Design Standards for New Apartments- Guidelines for Planning Authorities' of July 2023* ["*the 2023 Guidelines"*] which are the standards included in the Dublin City Development Plan 2022-2028.

The 2025 Guidelines state:

'Planning authorities and An Coimisiún Pleanála are required to have regard to the Guidelines and are also required to comply with any specific planning policy requirements (SPPRs) of the Guidelines, within the meaning of Section 28 (1C) of the Planning and Development Act 2000 (as amended) in carrying out their functions under the Act. Accordingly, where SPPRs are stated in this document, they take precedence over any conflicting policies and objectives of statutory plans'.

As such the proposed development has been assessed against the 2025 Guidelines which take precedence over the Development Plan standards. This section of the Planning Report sets out compliance with these standards in tandem with the detail set out in the Housing Quality Assessment. These Guidelines are the subject of a judicial review and therefore, this section also sets out how the proposed development also complies with the Dublin City Council Development Plan 2022-2028.

6.3.1 UNIT MIX

The proposed mix is in compliance with the mix requirements of SPPR 1 of the 2025 Guidelines which states:

SPPR1

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

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

The mix for the overall development is as follows:

		No.	%
Unit Mix	Studios	50	7.0%
	1 bed 2 person	304	42.8%
	2 bed 3 person	68	9.6%
	2 bed 4 person	283	39.8%
	3 bed 5 person	6	0.8%
	Total	711	100.0%

Fig 6-4: Overall Unit Mix

	Studios	1 Bed (2P)	2 Bed (3P)	2 Bed (4P)	3 Bed (5P)	Total
Block 7	5	117	16	136	6	280
Block 8	29	106	21	107	0	263
Block 9	16	81	31	40	0	168
	50	304	68	283	6	711

Fig 6-5: Individual Zone Unit Mix

SPPR1 does not identify any restrictions on unit mix and as such the scheme is compliant with SPPR 1 of the 2025 Guidelines.

Section 15.9.1 of the Development Plan, in respect of Unit Mix, states:

Section 15.9.1
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 Development Plan HNDA does not identify a specific mix requirement for this site. The unit mix, not being more than 50% studios and 1-bed units, is therefore compliant with Section 15.9.1.

6.3.2 FLOOR AREAS

The proposed floor areas are in compliance with the requirements of SPPR 2 of the 2025 Guidelines which states:

SPPR2
The following minimum apartment floor areas shall apply, and statutory plans shall not specify minimum floor areas that exceed the minimum floor areas set out below:

- Studio apartment (1 person) 32sq.m
- 1-bedroom apartment (2 persons) 45 sq.m
- 2 bedroom apartment (3 persons) 63 sq.m
- 2-bedroom apartment (4 persons) 73 sq.m
- 3-bedroom apartment (4 persons) 76 sq. m
- 3-bedroom apartment (5 persons) 90 sq.m

The floor area parameters set out above shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing.

The proposed residential units meet or exceed the minimum standards for apartment sizes under SPPR 2. The proposed units also meet the minimum standards as set out in the previous 2023 Guidelines, ensuring no studio unit is less than 37sq.m.

In respect of Floor Areas the 2025 Guidelines also identify that *'In the interests of delivering sustainable and good quality urban development, these Guidelines should be applied in a way that ensures a good mix of apartment sizes.* ***Accordingly, at least 25% of units within a development shall exceed the minimum sizes set out in SPPR2 by 10%,*** *with the potential for more than 25% of units to exceed the sizes set out in SPPR2 to be provided as required on a scheme-by-scheme basis in apartment schemes in more suburban locations, social housing developments, social and affordable housing delivered under Part V and schemes to provide housing for older persons and/or persons with disabilities.*

The proposed scheme includes for 55% of units exceeding the minimum sizes, thereby in compliance with the 2025 Guidelines. Compliance with minimum aggregate floor areas and widths for living/dining/kitchen rooms and bedrooms is outlined in the HQA as prepared by HJL and accompanies the application.

Section 15.9.2 of the Development Plan states:

Section 15.9.2
Minimum Apartment Floor Areas:

- Studio apartment (1 person) 37 sq.m
- 1-bedroom apartment (2 persons) 45 sq.m
- 2-bedroom apartment (4 persons) 73 sq.m
- 3-bedroom apartment (5 persons) 90 sq.m

The floor area sizes in Section 15.9.2 are consistent with or greater than the 2025 Guidelines, noting the absence of a standard for a 3-bed (4 person) which is a new introduction, and as such the proposed development is considered in compliance with the Development Plan.

6.3.3 ASPECT

The proposed scheme is in compliance with the requirements SPPR 3 of the 2025 Guidelines which states:

SPPR3
In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:
(i) A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.
(ii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.

The proposed development includes for c. 53.2% of dual aspect units, in compliance with the 2025 Guidelines standards. This is also in compliance with the previous 2023 Guidelines which required a minimum dual aspect of 50% of units.

The 2025 Guidelines further state that:

Where single aspect apartments are provided, the number of south facing units should be maximised, with west or east facing single aspect units also being acceptable. Living spaces in apartments should provide for direct sunlight for some part of the day. North facing single aspect apartments may be considered, where overlooking a significant amenity such as a public park, communal space or some other amenity feature (subject to environmental considerations such the impact of lighting on natural habitats). Particular care is needed where windows are located on lower floors that may be overshadowed by adjoining buildings.

The proposed development includes for c. 4.64% single aspect north facing units, which equates to 33 units out of a total of 711 units. This is primarily as a result of the orientation of the blocks along the continued Market Street, the provision of which is set out in the SDRA Objectives. The orientation of Market St and the requirement to provide frontage to the street dictates the provision of a level of north facing single aspect units.

To mitigate the limitations associated with north-facing single-aspect apartments, the proposal incorporates a comprehensive package of compensatory measures to safeguard residential amenity and public realm quality.

A range of design responses have been applied:

- affected units have been increased in size to improve internal layouts and daylight distribution;
- window openings and sill heights have been optimised to maximise diffuse daylight; and enlarged, partly sheltered balconies provide usable private outdoor space.
- The Market Street frontage is designed as an active, landscaped pedestrian and cyclist route, prioritising greenery and seating and excluding through-traffic to improve outlook, air quality and acoustic comfort.
- High-performance glazing, targeted solar control and appropriate ventilation strategies are specified to maintain thermal comfort year-round.

Section 15.9.3 of the Development Plan states:

Section 15.9.3
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.
In prime city centre locations, adjoining or adjacent to high quality, high frequency public transport, 33% dual aspect may be accepted in locations where there are specific site constraints such as tight urban infill sites up to 0.25ha or where there is a need to maintain a strong street frontage. In the outer city (beyond the canal ring) and within the SDRA's, schemes with a minimum of 33% dual aspects units will only be considered in exceptional circumstances

The proposed development with a dual aspect ratio of 53.2% is in excess of the Development Plan requirements of both 33% and 50% and as such is compliant with the Development Plan standards.

6.3.4 FLOOR TO CEILING HEIGHTS

The proposed heights are in compliance with the requirements of SPPR 4 of the 2025 Guidelines which states:

SPPR4
Ground level apartment floor to ceiling heights shall be a minimum of 2.7m. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by case basis, subject to overall design quality.

The 2025 Guidelines identify that 2.4m is standard good practice however 2.7m would be a minimum standard for ground floor apartments but a higher ground floor should be considered where apartments are not proposed at ground level.

The proposed scheme has increased ground floor heights as commercial uses and plant areas are located at ground floor, and all residential units are compliant with the 2025 Guidelines. Detailed daylight assessment has been carried out on the proposed development by OCSC and is outlined in greater detail in their accompanying report.

Section 15.9.4 of the Development Plan states:

Section 15.9.4
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.

The proposed development includes a range of ground floor heights,in the range of 3-4m, suitable to the various uses located at ground level. Commercial uses have an increased height in compliance with the above and own door units provided at ground level also have an increased floor to ceiling height in compliance with the Development Plan.

6.3.5 LIFT AND STAIR CORES

The proposed scheme is in compliance with the requirements of SPPR 5 of the 2025 Guidelines which states:

SPPR5
There shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number of units per floor per core.

The proposed development has sought to minimise the number of cores and maximise the number of apartments with no more than 12 units per core which is in compliance with the 2025 Guidelines, which have no limit.

Section 15.9.5 of the Development Plan states:

Section 15.9.5
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 apartments 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**.**

No block has more than 12 units per core and therefore is in compliance with the Development Plan.

6.3.6 STORAGE

The 2025 Guidelines state that minimum storage requirements must be met as follows:

- Studio 3 sq.m
- 1-bed 3 sq.m.
- 2-bed (3P) 5 sq.m.
- 2-bed (4P) 6 sq.m.
- 3-bed (4P) 6 sq.m.
- 3-bed (5P) 9 sq.m.

All units in the scheme meet or exceed the requirements. Compliance is set out in the HQA as submitted as part of the architects pack.

The proposed scheme is also in compliance with the requirements of Section 15.9.6 of the Development Plan which states that:

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.

As there is no difference in the standards between the 2023 Guidelines and the 2025 Guidelines, the proposed units meet or exceed the requirements in respect of storage in both the 2025 Guidelines and the Development Plan. Compliance with minimum storage requirements is set out in the HQA as submitted.

6.3.7 PRIVATE AMENITY SPACE

The 2025 Guidelines require the following minimum private amenity sizes:

- Studio 4 sq.m
- 1-bed 5 sq.m.
- 2-bed (3P) 6 sq.m.
- 2-bed (4P) 7 sq.m.
- 3-bed (4P) 7 sq.m.
- 3-bed (5P) 9 sq.m.

The 2025 Guidelines identify that '*private amenity space shall be provided in the form of gardens or patios/terraces for ground floor apartments and balconies or terraces at upper levels. Where provided at ground level, private amenity space shall incorporate boundary treatment appropriate to ensure privacy and security'.*

As set out in the HQA private amenity space has been provided for all units, and in all cases meets or exceed the minimum standards for private open space as per the 2025 Guidelines.

Section 15.9.7 of the Development Plan states the following:

Section 15.9.7
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.

Private amenity space has been provided on all units, and in all cases meets or exceed the minimum standards for private open space. This is considered acceptable noting Section 15.9.7 of the Development Plan which references Appendix 1 and Section 3.35 to 3.39 of the Sustainable Urban Housing: Design Standards for New Apartments which has been superseded by Section 4.3 and Appendix 1 of the Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025. Both documents contain the same standards, so the proposed development is compliant with both.

6.3.8 COMMUNAL AMENITY SPACE

The 2025 Guidelines require the following minimum communal amenity areas:

- Studio 4 sq.m
- 1-bed 5 sq.m.
- 2-bed (3P) 6 sq.m
- 2-bed (4P) 7 sq.m.
- 3-bed (4P) 7 sq.m.
- 3-bed (5P) 9 sq.m.

As set out in the Architects Design Statement the communal amenity space is provided at landscaped first floor podium courtyards for each block in line with the required levels identified in the 2025 Guidelines.

Section 15.9.8 and 15.9.9 the Development Plan requires that communal amenity space must be provided within a scheme as follows:

Section 15.9.8
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.

Section 15.9.9
Roof terraces may be provided in certain circumstances subject to an assessment of accessibility, safety and micro-climatic impacts. Roof terraces will not be permitted as the primary form of communal amenity space but may contribute to a combination of courtyard and or linear green space.

This is considered acceptable noting Section 15.9.8 of the Development Plan which references Appendix 1 and Section 4.10 to 4.12 of the Sustainable Urban Housing: Design Standards for New Apartments which has been superseded by Section 4.3 and Appendix 1 of the Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025. Both documents contain the same standards, so the proposed amendments are compatible with both.

The scheme requires the following, in respect of communal amenity spaces:

		No.	Area	Total
Communal Open Spaces	Studios	50	4	200
	1 bed	304	5	1520
	2 bed (3P)	68	6	408
	2 bed (4P)	283	7	1981
	3 bed (5P)	6	9	54
	Total	6		4163

Fig 6-6: Overall Communal Space Requirement

Zone 7		No.	Area	Total
Communal Open Spaces	Studios	5	4	20
	1 bed	117	5	585
	2 bed (3P)	16	6	96
	2 bed (4P)	136	7	952
	3 bed (5P)	6	9	54
	Total	280		1707

Fig 6-7: Zone 7 Communal Space Requirement

Zone 8		No.	Area	Total
Communal Open Spaces	Studios	29	4	116
	1 bed	106	5	530
	2 bed (3P)	21	6	126
	2 bed (4P)	107	7	749
	3 bed (5P)	0	9	0
	Total	263		1521

Fig 6-8: Zone 8 Communal Space Requirement

Zone 9		No.	Area	Total
Communal Open Spaces	Studios	16	4	64
	1 bed	81	5	405
	2 bed (3P)	31	6	186
	2 bed (4P)	40	7	280
	3 bed (5P)	0	9	0
	Total	168		935

Fig 6-9: Zone 9 Communal Space Requirement

A total of 4,163 sq.m is required under the 2025 Guidelines and as set out in the Architects Design Statement a total of 4,771 sq.m is provided at podium level across the three blocks. Each podium area provided exceeds the minimum requirements. The courtyard areas are measured excluding non-amenity features such as vents, buffers areas etc. which occur in limited places in the courtyards.



Fig 6-10: Proposed Quantum of Communal Amenity Spaces (Source: HJL, 2026)

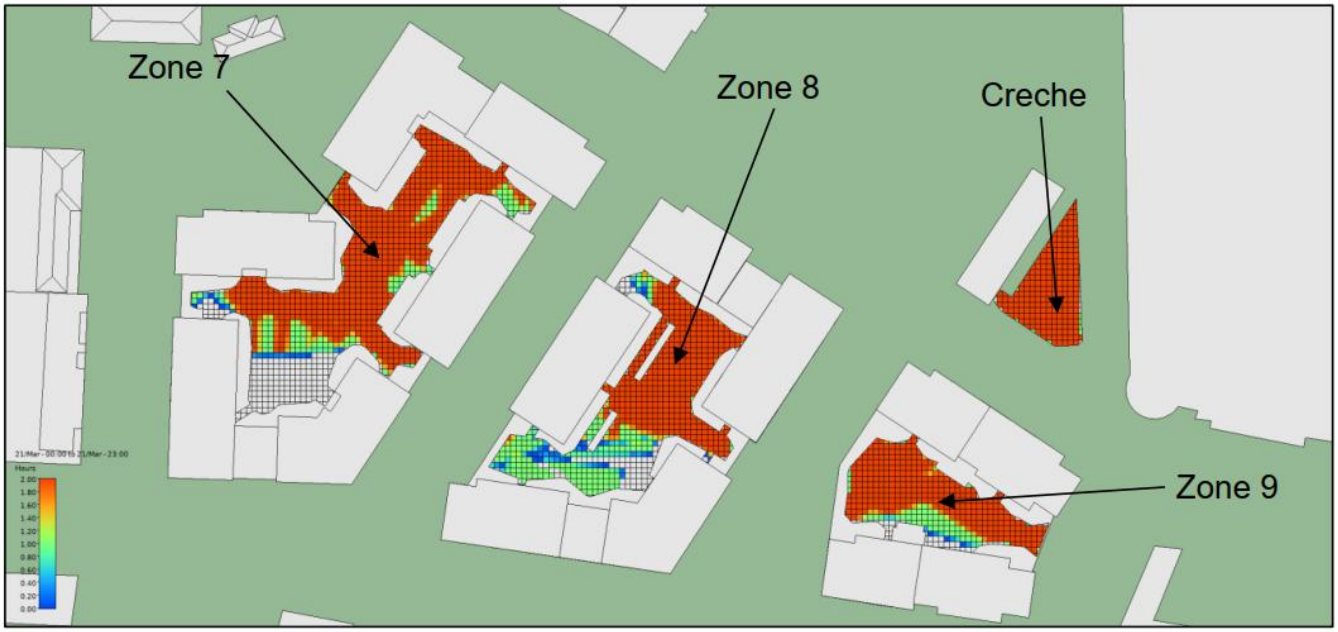


Fig 6-11: Sunlight to Communal Spaces Visual Results

The courtyard areas, at podium level, all receive in excess of the 50% of area for 2 hours sunlight required.

Unit Ref.	Area (m^2)	Area receiving over 2 hours of sunlight (%)	Portion of Amenity Space receiving ≥ 2 hours Sunlight on 21st March (%)
Zone 7	2206.06	1603.76	72.7%
Zone 8	1523.55	804.43	52.8%
Zone 9	934.49	702.74	75.2%
Creche	492.29	487.85	99.1%
Overall Total			69.8%

Fig 6-12: Sunlight to Communal Spaces Table Results

As seen in the table above, the overall amenity space areas comply with the BRE 209, 3rd Edition, regarding sunlight recommendations, as they receive at least 2 hours of sunlight on March 21st.

6.3.9 INTERNAL COMMUNAL FACILITIES

Section 15.9.10 of the Development Plan identifies, in respect of communal facilities:

Section 15.9.10
Large scale developments in excess of 100 or more units are encouraged to provide for internal communal facilities for use by residents. These facilitates include laundry rooms, community or meeting rooms, management offices, co – working spaces etc. Other uses such as gyms or co-working spaces can also be provided and available to non-resident users also. The range of uses proposed should be discussed with the planning authority at pre application stage.

While no dedicated internal communal facilitates are proposed within the scheme it is considered that future residents will have access to a significant range of community, cultural, arts & social spaces provided in this scheme and in the adjacent Blocks 5 and 6 which will be constructed and open prior to the completion of these blocks. These spaces will accommodate a range of uses, likely including community uses which will be available to all residents.

6.3.10 PUBLIC OPEN SPACE

The Development Plan sets out requirements for 10% Public Open Space for SDRAs. The open space strategy for the entire Clongriffin Lands was established in early planning permissions for the site, with the majority of space either provided upfront or in subsequent applications. The final elements of the Open Space strategy are to be delivered in Grant Park (as permitted an under construction under LRD6064/24-S3) and Railway Park (which is provided in future phases).

This approach was set out in the application for Blocks 5 & 6 (LRD6064/24-S3) which was granted permission by Dublin City Council. We note the Planner's Report states that:

Public Open Space proposed by the subject application is 1,433 sq.m (0.1434 ha); 6.5% of the site area. There has been 5.1326 ha permitted and delivered on the Clongriffin Lands under previous consents (0132/02, 5945/04 and 2610/16). As a result of the current proposal there would be provision of 5.276 ha (or 98.55%) across the wider Clongriffin Lands that extends to 53.56 ha. The remaining 0.08ha (or 0.15%) public open space delivery will be delivered as a future phase of development by the LDA. A Public Open Space Masterplan was submitted as part of the application. As noted within the report prepared by Parks, Landscape and Biodiversity Services: Public open space is provided for by Grant Park, consisting of an area of 1,433m2. This park provides for passive amenity as Fr Collins Park also services this area with multiple active recreational facilities. It is proposed by the applicant that this park is Taken in Charge. In keeping with the original open space masterplan it is intended that Grant Park will have

in particular dedicated evergreen tree planting. All details for the construction of the park, in particular existing ground clearance, sub-soil de-compaction and soil build-up, will require approval of Park Services before implementation.

As such it is considered that the public open space requirement, under the SDRA, has already been provided for, for this application. The scheme itself does supplement this through the delivery of Market Street as a pedestrianised route providing for public realm spaces including seating and ability for use for events.

6.4 PLOT RATIO & SITE COVERAGE

The Development Plan, in Table 2 of Appendix 3 of Volume 2, sets indicative plot ratio and site coverage levels, to be used as a tool to assess development proposals The Development Plan however acknowledges that in respect of plot ratio it cannot be used alone to determine development proposals and *'should, therefore, be considered in conjunction with other development control measures, including site coverage, building heights, public and private open space, and parking provision etc.'* and in respect of site coverage *'It is a tool that is particularly relevant in urban locations where open space and car parking standards may be relaxed*'.

The Development Plan sets an indicative plot ratio standard of 1.5 – 3.0 for 'Regeneration Area'. The proposed scheme has a plot ratio of 2.12.

The Development Plan sets an indicative site coverage standard of 50-60% for 'Regeneration Area'. The proposed scheme has a site coverage of 53%.

The proposed plot ratio and site coverage figures of the development are in line with the indicative levels set out in the Development Plan.

6.5 HEIGHT & DENSITY

Appendix 3 of the Development Plan sets out a building height strategy for the city. As set out in Section 5.1.7 of this Report, the Dublin City Development Plan 222-2028, in Appendix 3, has incorporated the Urban Development and Building Heights Guidelines For Planning Authorities (December 2018) into the Development Plan, and as such Appendix 3 is the relevant criteria for assessment of the height and density proposed under this scheme.

Section 1.0 of Appendix 3 of the Development Plan states:

'The purpose of this Appendix is to set out guidance on how to achieve appropriate and sustainable compact growth in the city and specifically, to ensure consistency with the Urban Development and Building Heights Guidelines for Planning Authorities (December 2018) and the SPPR's contained therein. Guidance is set out regarding appropriate areas for increased density and height.'

Section 4.1 of Appendix 3 states:

'This section sets out a policy approach for the assessment of development of increased height, scale and density in the city that aligns with the Section 28 Guidelines. In accordance with the guidance set out therein and specifically SPPR 1, areas are identified where increased height will be supported. As per the requirements of SPPR 3, a series of performance based development management criteria are set out to ensure protection of residential, heritage, streetscape and landscape amenity. ***All proposals with significant increased height and density over the existing prevailing context must demonstrate full compliance with the performance criteria set out in Table 3'.***

Appendix 3 notes that consideration of what constitutes a tall building can be subjective and also depends on surrounding context. It identifies that within Dublin there are three general categories of height to be considered:

- ***Prevailing Height:*** *This is the most commonly occurring height in any given area. It relates the scale, character and existing pattern of development in an area. Within such areas, there may be amplified height. This is where existing buildings within the streetscape deviate from the prevailing height context, albeit not to a significant extent, such as local pop-up features. Such amplified height can provide visual interest, allow for architectural innovation and contribute to a scheme's legibility.*
- ***Locally Higher Buildings****: These are buildings that are significantly higher than their surroundings and are typically up to 50 metres in height. Higher buildings can act as Local or District landmarks.*
- ***Landmark/Tall Buildings****: A landmark or tall building is one that is a significant intervention in the cityscape and skyline. They are typically located in an area that denotes a specific function such as a public transport interchange or a key urban quarter/ regeneration site. Landmark/tall buildings are typically in excess of 50 metres in height, of exceptional architectural quality, can help people navigate through the City and form memorable reference points.*



Figure 6-13: Proposed Heights adjacent existing, permitted and proposed heights (Source: HJL, 2026)

The proposed development aligns with both the categories of Prevailing Height, as most of the scheme is 5-8 storeys, and Locally Higher Buildings, with one block rising to 10 storeys. The predominant height in the proposed development is 7 storeys with Zone 7 being 5-7, Zone 8 being 6-8 and Zone 9 being 6-10. As set out in the SDRA Guiding Principles, discussed in Section 6.2.1 above, height in the area should:

- *Building heights shall respond to the proposed urban structure and land uses and activities.* ***In general, the KUV centres*** *at Belmayne Town Centre* ***and Clongriffin Train Station shall contain the greatest building heights, in order to reinforce their status as a KUV, subject to amenity and design safeguards****.*

- *Gateway buildings form a key structuring element, enhancing legibility and avoiding the proliferation of monolithic heights. As such,* ***locally higher buildings shall be located within the KUV*** *and along the Belmayne-Belcamp link, as illustrated.*
- *The following building heights shall be applied:*
    - *Minimum heights of 5 storeys to the Key Urban Village centres at Clongriffin Rail Station and Belmayne Town Centre at the R139/R107 junction.*
    - *Minimum heights of four to five storeys for Main Street Boulevard.*
    - *A locally higher building adjacent to the rail station and at the junction of Malahide Road / R152*

As set out above the heights are reduced to the west of the scheme, down to 5-6 storeys, where they meet existing residential development and rises as the scheme moves eastwards fronting on to Station Square and the KUV, up to 8 storeys with one block rising to 10 storeys to provide for a focal building.

The Development Plan in Section 4.1 of Appendix 3 states *'As a general rule, the development of innovative, mixed-use development that includes buildings of between 5 and 8 storeys, including family apartments and duplexes is promoted in the key areas identified below. Greater heights may be considered in certain circumstances depending on the site's location and context and subject to assessment against the performance-based criteria set out in Table 3'.*

As set out in table below, the proposed scheme is assessed against the criteria for assessing proposals for enhanced height, density and scale, as one block is proposed as being within the Locally Higher Buildings category, as per Table 3 of Appendix 3 of the Development Plan – Please also see design details in the accompany Architects Design Statement:

Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale:	**Clongriffin Zone 7, 8 & 9 Scheme Response:**
1. To promote development with a sense of place and character Enhanced density and scale should: • Respect and/or complement existing and established surrounding urban structure, character and local context, scale and built and natural heritage and have regard to any development constraints, • have a positive impact on the local community and environment and contribute to 'healthy placemaking', • create a distinctive design and add to and enhance the quality design of the area, • be appropriately located in highly accessible places of greater activity and land use intensity, • have sufficient variety in scale and form and have an appropriate transition in scale to the boundaries of a site/adjacent development in an established area,	A total height ranging from 5 – 10 no. storeys is proposed in respect of the surrounding height context; in this regard the taller elements (10 storeys) is located to Zone 9. The scheme provides for a high quality, and significant quantum of residential development on a site zoned for residential use and proximate to high frequency public transport within an existing established urban village of Clongriffin which supports compact growth of key urban villages. The scheme delivers 711 no. residential units in addition to crèche/retail uses, significant community/cultural space, and extensive public realm enhancements available to both the existing and future community. The location, height and orientation of apartment blocks has been carefully considered to enhance and protect

Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale:	Clongriffin Zone 7, 8 & 9 Scheme Response:
• not be monolithic and should have a well-considered design response that avoids long slab blocks, • ensure that set back floors are appropriately scaled and designed.	existing residential development but to also provide for variety and focal buildings. The proposed development has been designed to minimise the number of north-facing apartments, thereby maximising sunlight exposure and enhancing the quality of life for residents. A variation of façade materials are proposed across building elevations providing a diverse range of facades, that complement, and to assist with the breakdown of scale and mass. This allows for more varied frontages and streets creating a distinct sense of place.
2. To provide appropriate legibility Enhanced density and scale should: • make a positive contribution to legibility in an area in a cohesive manner, • reflect and reinforce the role and function of streets and places and enhance permeability.	The layout of the proposed scheme has been carefully considered with a focus on connectivity through residential streets to key movement streets of Market St and Main St. A variety of routes have been incorporated to traverse the site, North to South and East to West to the KUV and Train Station, to connect the spaces and provide maximum permeability and choice in a safe and pleasant environment. The transport and mobility strategy for the site seeks to capitalise on the site's accessible location and maximise opportunities for sustainable travel through a reduction in parking and extensive cycle parking.
3. To provide appropriate continuity and enclosure of streets and spaces Enhanced density and scale should: • enhance the urban design context for public spaces and key thoroughfares, • provide appropriate level of enclosure to streets and spaces, • not produce canyons of excessive scale and overbearing of streets and spaces, • generally be within a human scale and provide an appropriate street width to building height ratio of 1:1.5 – 1:3, • provide adequate passive surveillance and sufficient doors, entrances and active uses to generate street-level activity, animation and visual interest.	The urban design context of the scheme is based upon promoting connectivity and permeability to from Clongriffin Train Station and the KUV lands and the wider Clongriffin lands. The provision of Market Street, and the enclosure of it as a key route is central to the scheme. Market Street is a wider street, allowing for integration of active travel routes, and gathering and event spaces while the intermediary streets have a greater residential sense to them so are tighter in nature. Main St is further animated with community/cultural and retail uses, providing for key frontages on the more public facing streets. To the northeast of the site a standalone two storey childcare facility building and external play area is proposed providing for future residents. It provides an

Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale:	Clongriffin Zone 7, 8 & 9 Scheme Response:
	openness to the KUV end of Market Street, surrounded by taller buildings of 5-8 storeys. The residential buildings sit within the established form of the SDRA Guiding Principles and as such have elevations and facades on all sides ensuring passive surveillance and interest on all roads/streets in the scheme.
4. To provide well connected, high quality and active public and communal spaces Enhanced density and scale should: • integrate into and enhance the public realm and prioritises pedestrians, cyclists and public transport, • be appropriately scaled and distanced to provide appropriate enclosure /exposure to public and communal spaces, particularly to residential courtyards, • ensure adequate sunlight and daylight penetration to public spaces and communal areas is received throughout the year to ensure that they are useable and can support outdoor recreation, amenity and other activities – see Appendix 16, • ensure the use of the perimeter block is not compromised and that it utilised as an important typology that can include courtyards for residential development, • ensure that potential negative microclimatic effects (particularly wind impacts) are avoided and or mitigated, • provide for people friendly streets and spaces.	As noted, the urban design context of the scheme is based upon promoting connectivity and permeability to from Clongriffin Train Station and the KUV lands and the wider Clongriffin lands. The provision of Market Street, and the enclosure of it as a key route is central to the scheme. The permeability of the scheme provides for connections to the existing extensive public open space provided, and to existing local services. In addition, Grant Park will be delivered as part of the blocks 5 and 6 which is currently under construction. Market St is the critical component of the proposed development, as part provided under the permission for Block 5 & 6 and completed as part of this proposed development. It provides for a predominantly pedestrian/active travel focussed route with community/cultural uses and residential own door units. It is considered given its location directly from existing residential to the KUV/Train Station it is considered that this will be a highly active route. The proposed zones are each centralised around dedicated communal courtyards, which are of a high quality and provide for protected external spaces for residents. They are set at podium level and the blocks are broken up to ensure adequate sunlight can penetrate into the blocks. With regard to microclimate effects relative to the site, a Daylight and Sunlight has been a key consideration throughout the design process, and a Daylight Assessment has been prepared by OCSC as part of this

Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale:	Clongriffin Zone 7, 8 & 9 Scheme Response:
	LRD Application and a Wind Microclimate Assessment has been carried out as part of the EIAR.
5. To provide high quality, attractive and useable private spaces Enhanced density and scale should: • Not compromise the provision of high quality private outdoor space, • ensure that private space is usable, safe, accessible and inviting, • ensure windows of residential units receive reasonable levels of natural light, particularly to the windows of residential units within courtyards – see Appendix 16, • assess the microclimatic effects to mitigate and avoid negative impacts, • retain reasonable levels of overlooking and privacy in residential and mixed use development.	The site layout and building form has been designed to minimise north facing apartments and to take advantage of south facing light while also providing frontage onto Market St, as required. The massing strategy adopts a gradual transition in building heights, with higher buildings concentrated towards the KUV/Train Centre (to the east) and lower buildings positioned near the adjacent houses (to the west). The amount of natural light received from the units has been considered within the design and is discussed in the Daylight Assessment prepared by OCSC. All communal amenity spaces at podium are adequately overlooked by the proposed apartments. Terraces at ground floor level and balconies at upper levels ensures a good level of passive surveillance. Own door unis onto the street have adequate privacy and security with landscaped terraces provided. All of the public open space and communal amenity spaces meet the requirements with regards to daylight and this is set out in the OCSC Report.
6. To promote mix of use and diversity of activities Enhanced density and scale should: • promote the delivery of mixed use development including housing, commercial and employment development as well as social and community infrastructure • contribute positively to the formation of a 'sustainable urban neighbourhood' • include a mix of building and dwelling typologies in the neighbourhood, • provide for residential development, with a range of housing typologies suited to different stages of the life cycle	The proposed development is a primarily residential development however it does include for retail uses cognisant of its location adjacent the KUV lands and the need to animate public street. Additionally, elements of community/cultural/arts infrastructure are proposed including a childcare facility and community/cultural spaces. The proposed scheme meets the requirements of Objective CUO25 by providing for community/cultural space within the scheme. This development provides a range of affordable (cost rental) apartment units ranging from studios to 3 bed units ensuring that there is a typology mix and offering in the scheme suited to all stages of the lifecycle. The open and urban nature of the development, and the permeability through the residential zones will result in the proposed development sitting into its context and

Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale:	Clongriffin Zone 7, 8 & 9 Scheme Response:
	becoming a part of the existing communities that surround it rather than a gated or closed development. Each apartment block includes a number of 'Universal Design Accessible Units' suitable to accommodate those with accessibility difficulties. For further details on Universal Design Accessible Units, please refer to the Architectural Design Statement.
7. To ensure high quality and environmentally sustainable buildings • be carefully modulated and orientated so as to maximise access to natural daylight, ventilation, privacy, and views to minimise overshadowing and loss of light – see Appendix 16, • not compromise the ability of existing or proposed buildings and nearby buildings to achieve passive solar gain, • ensure a degree of physical building adaptability as well as internal flexibility in design and layout, • ensure that the scale of plant at roof level is minimised and have suitable finish or screening so that it is discreet and unobtrusive, • maximise the number of homes enjoying dual aspect, to optimise passive solar gain, achieve cross ventilation and for reasons of good street frontage, • be constructed of the highest quality materials and robust construction methodologies, • incorporate appropriate sustainable technologies, be energy efficient and climate resilient, • have appropriate and reasonable regard to quantitative approaches to assessing daylighting and sun lighting proposals. Where appropriate, satisfactory, alternative compensatory design solutions should be provided for a failure to meet reasonable daylighting provisions, in the context of a constrained site or securing wider objectives such as comprehensive urban regeneration or an effective urban design and streetscape solution – see Appendix 16, • incorporate an Integrated Surface Water Management Strategy to ensure necessary public	The layout of the blocks has been carefully considered and designed to minimise north facing apartments in order to maximise natural daylight. The blocks have been orientated to exploit solar orientation with a high percentage of apartments with dual aspect (at c.53%) which will also ensure adequate amounts of natural light. For details on daylight and sunlight please refer to Daylight Assessment prepared by OCSC. All dwellings are designed to be Part L compliant with the building fabric being high insulated with best practice measures employed for airtightness and ventilation. A Climate Action & Energy Statement is submitted with the LRD Application. A Surface Water Management Plan has been prepared by CS Consulting which assesses the existing surface water drainage infrastructure the proposed surface water design, SUDS and calculations. A Site Specific Flood Risk Assessment has also been prepared by CS Consulting and is submitted as part of this LRD Application Pack.

Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale:	Clongriffin Zone 7, 8 & 9 Scheme Response:
surface water infrastructure and nature based S UDS solutions are in place – see Appendix 13, • include a flood risk assessment - see SFRA Volume 7.	
8. To secure sustainable density, intensity at locations of high accessibility Enhanced density and scale should: • be at locations of higher accessibility well served by public transport with high capacity frequent service with good links to other modes of public transport, • look to optimise their development footprint; accommodating access, servicing and parking in the most efficient ways possible integrated into the design	The site is ideally situated with accessibility by all modes to local amenities, the range of which will be expanded through the completion of Blocks 5 & 6. The site is served by a number of high frequency bus services Clongriffin Mainstreet and Station Square. In addition, the site is within easy walking distance of Clongriffin Railway Station. There are also planned improvements to the service frequency and public transport priority along Clongriffin as part of the Bus Connects network redesign and Core Bus Corridors project. The cycle facilities along these routes will also be improved as part of this plan in conjunction with the Greater Dublin Area Cycle Network Plan. Cycle parking and car parking is provided at both street and podium level to optimise the sites building footprint.
9. To protect historic environments from insensitive development Enhanced density and scale should: • not have an adverse impact on the character and setting of existing historic environments including Architectural Conservation Areas, Protected Structures and their curtilage and National Monuments – see section 6 below. • be accompanied by a detailed assessment to establish the sensitives of the existing environment and its capacity to absorb the extent of development proposed, • assess potential impacts on keys views and vistas related to the historic environment.	There are no protected structures or conservation areas in the vicinity of the site and archaeological context has been addressed and considered. The location, height and orientation of apartment blocks have been carefully considered to enhance the existing urban environment and protect existing residential lands in the Clongriffin area. The EIAR, which accompanies the LRD Application and includes a dedicated Landscape & Visual Impact Assessment which identifies that the proposed development sits comfortably within its existing urban context.
10. To ensure appropriate management and maintenance Enhanced density and scale should • Include an appropriate management plan to address matters of security, management of public/communal areas, waste management, servicing etc.	An Estate & Property Management Strategy is submitted as part of the LRD Application which addresses safety and security, management of public and communal open spaces, waste management and servicing. The TTA prepared by CS Consulting sets out proposals in respect of the management of car parking, and refuse and servicing arrangements.

Appendix 3 of the Development Plan discusses the influence density has in delivering successful development and place making and considers that higher densities are appropriate when there is a combination of mixed tenure homes, public open space and community facilities.

The Development Plan, in respect of density for SDRAs, identifies that a range of 100-250uph (units per hectare) is supported. Additionally, the Sustainable Residential Development and Compact Settlement Guidelines identify, on the basis of the site being a '*High Capacity Public Transport Node or Interchange'* a density range 50 dph to 250 dph (dwellings per hectare).

The proposed development has a density of 205 uph/dph in accordance with both the Development Plan and the Compact Settlement Guidelines 2024.

As such it is considered that the proposed heights and density are acceptable in line with the SDRA Guiding Principles and as considered against Appendix 3 of the Development Plan.

6.6 ACCESS, CAR & CYCLE PARKING

6.6.1 CAR PARKING

The Urban Development and Building Height Guidelines seek to minimise car-parking in accessible locations and to maximise a modal shift to public transport. Similarly, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities identify in SPPR 3 that, *'In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling*.

Further the *Sustainable Urban Housing: Design Standards for Apartments (Guidelines for Planning Authorities)*, published by the Department of Housing, Planning and Local Government in July 2025 ('the Apartment Guidelines'), gives the following guidance on the provision of residential car parking:

"In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances. The policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such [as] rail and bus stations located in close proximity.

"These locations are most likely to be in cities, especially in or adjacent to (i.e. within 15 minutes walking distance of) city centres or centrally located employment locations. This includes 10 minutes walking distance of DART, commuter rail or Luas stops or within 5 minutes walking distance of high frequency (min 10 minute peak hour frequency) bus services.

The proposed development provides a total of 335no. car parking spaces, located as follows:

- 130 no. internal spaces at ground floor (undercroft) level within Block 7.
- 12 no. on-street spaces on Friar's Street, adjacent to Block 7.
- 13 no. on-street spaces on Park Street, adjacent to Block 7.

- 17 no. on-street car parking spaces on Lake Street, between Block 7 and Block 8.
- 82 no. internal spaces at ground floor (undercroft) level within Block 8.
- 21 no. on-street parking spaces on Market Lane, between Block 8 and Block 9.
- 40 no. internal spaces at ground floor (undercroft) level within Block 9.
- 10 no. on-street parking spaces on Main Street along the southern site boundary.
- 10 no. on-street parking spaces on Clongriffin Road, including 4no. set down spaces allocated to the proposed childcare facility.

The development's proposed overall car parking provision (excluding crèche spaces and visitor/commercial spaces) equates to a ratio of 0.46 spaces per residential unit. It is proposed to retain on-street car parking spaces on Friar's Street, Park Street, Market Lane and Lake Street within the ownership of the LDA who shall be responsible for the management and maintenance of these car parking spaces. Noting this approach was raised by DCC at LRD Opinion stage this is considered further in the Response to LRD Opinion.

This parking space ratio does not include the proposed on-street spaces on Main Street (10 no.) as these shall be offered for taking in charge by Dublin City Council and therefore cannot be restricted to use by residents of the development. The LDA is open to discussions regarding the implementation of a permit system in relation to parking spaces on the development's internal streets. The development's 2no. loading bays are also intended to be taken in charge.

All internal car parking spaces are located within the buildings' undercroft car parking areas and so will remain in the ownership of the LDA/ development's Management Company. Residential parking spaces shall not be assigned to individual apartment units; spaces shall instead be allocated and/or leased to residents on the basis of availability and need, in part by means of a permit/lottery system, in order to optimise the use of parking spaces.

Based on the site accessibility, the relevant guidelines and international best practice, this is considered the optimal number of spaces for the site that will ensure the sustainability of the site but facilitate a level of car storage. This is considered further in the accompanying Traffic & Transport Assessment prepared by CS Consulting. The management approach to these spaces is also set out in the Traffic & Transport Assessment.

6.6.2 CYCLE PARKING

The proposed development's bicycle parking provision has been assessed with respect to the *Dublin City Development Plan 2022–2028*, which defines the minimum standard bicycle parking provision for new developments by land use type. These bicycle parking standards are the same as those given in the *Design Standards for Apartments, Guidelines for Planning Authorities*.

The proposed development has a total bicycle parking provision of 1,605 no. spaces. These include:

- 512 no. standard residents' spaces in secure dedicated bicycle stores at ground floor (undercroft) level within Block 7.
- 25 no. residents' oversized cycle spaces in a secure dedicated bicycle store at ground floor (undercroft) level within Block 7.
- 384 no. standard residents' spaces in secure dedicated bicycle stores at ground floor (undercroft) level within Block 8.
- 21 no. residents' oversized cycle spaces in a secure dedicated bicycle store at ground floor (undercroft) level within Block 8.

- 234 no. standard residents' and childcare facility staff spaces in secure dedicated bicycle stores at ground floor (undercroft) level within Block 9.
- 12 no. residents' oversized cycle spaces in a secure dedicated bicycle store at ground floor (undercroft) level within Block 9.
- 412 no. standard visitor spaces provided externally within the Block 7, Block 8 and Block 9 (in the form of 206 no. Sheffield stands).

The proposed residential development will promote sustainable travel patterns due to its location, layout, design and proximity to the public transport and cycle networks. These will be complemented with a Residential Travel Plan, a draft of which is included in the LRD Application, and the appointment of a Mobility Manager to promote sustainable travel patterns by residents.

6.6.3 ACCESS

The proposed development includes the construction or extension of surrounding streets to enable access to the development via the existing Clongriffin road network. These street elements to be constructed include a section of Lake Street (located between Block 7 and Block 8), as well as Market Lane and sections of Market Street. It is also proposed to construct additional car parking along the existing streets of Main Street and Clongriffin Road. On-street parking to serve the proposed development will be constructed as part of this expansion of the existing Clongriffin road network; 2no. new loading bays will also be provided on the Main Street and Lake Street. A Servicing & Delivery Assess Strategy Report is prepared by CS Consulting is submitted as part of the planning application.

6.7 CHILDCARE FACILITY

A standalone two storey childcare facility is proposed to cater for the needs of the development. It is proposed to be located at the entrance to Market Street and will serve as a gateway into the wider lands and a landmark on the green route to Father Collins Park. The proposed childcare facility has an overall gross floor area of c. 911 sq.m. The childcare facility has a secure outdoor play area of 509 sq.m overlooking Market Street and Clongriffin Road.

Guidelines for Planning Authorities on Childcare Facilities (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing estates where planning authorities should require the provision of a minimum of one childcare facility with 20 places for each 75 dwellings.

The Planning Design Standards for Apartments Guidelines for Planning Authorities (2025) states that:

Notwithstanding the Planning Guidelines for Childcare Facilities (2001), which are subject to review, 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, the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. One-bedroom or studio type units should not generally be considered to contribute to a requirement for any on-site childcare provision and subject to the factors above, this may also apply in part or whole, to units with two or more bedrooms.

The proposed development includes for 50 no. studio units and 304 no. one-bedroom units which equates to 49.8% of the overall unit mix and are discounted from the unit mix in compliance with the above. As such, the proposed development consists of 351 no. two-bedroom units and 6 no. 3-bed units (357 no. units in total).

Applying the standard as set out in the Childcare Facilities Guidelines for Planning Authorities (2001) of 1 facility of 20 childcare spaces for each 75 units results in a requirement for c.95 No. places.

The childcare facility as proposed is c.911 sq.m which equates to c.120 spaces exceeding the requirements of the proposed scheme. It is noted that the LDA are also providing a crèche in the under-construction Block 5 & 6 scheme which has been provided based on exceeding the number of spaces required for the proposed development.

We submit that this crèche will meet the needs of future residents considering: the development characteristics, namely, the unit mix; the demographic profile of the area; and the existing and permitted provision of childcare facilities in the area. For further details on existing and proposed childcare demand and facilities, please refer to the Childcare Facilities and School Demand Assessment prepared by Brady Shipman Martin as part of this LRD Application.

6.8 COMMUNITY, CULTURAL & ARTS USES

The Dublin City Development Plan 2022-2028 (Development Plan) notes that the need for cultural offering will grow in tandem with the continuous growth in Dublin. As part of the Development Plan, a cultural infrastructure study of the city was undertaken, and the following polices are in place:

CUO25 – SDRAs and Large Scale Developments
All new regeneration areas (SDRAs) and large scale developments above 10,000 sq. m. in total area must provide at a minimum for 5% community, arts and culture spaces including exhibition, performance, and artist workspaces predominantly internal floorspace as part of their development at the design stage. The option of relocating a portion (no more than half of this figure) of this to a site immediately adjacent to the area can be accommodated where it is demonstrated to be the better outcome and that it can be a contribution to an existing project in the immediate vicinity. The balance of space between cultural and community use can be decided at application stage, from an evidence base/audit of the area. Such spaces must be designed to meet the identified need.*
**Such developments shall incorporate both cultural/arts and community uses individually or in combination unless there is an evidence base to justify the 5% going to one sector.*

QHSN20 – Community Facilities for People with Specific Planning and Design Needs
To facilitate the provision of community facilities for people with specific planning and design needs, such as family resource centres, Traveller resource centres, youth centres and youth cafes, skateboarding areas and kids clubs subject to compliance with normal planning criteria.

QHSN48 - Community and Social Audit
To ensure that all residential applications comprising of 50 or more units shall include a community and social audit to assess the provision of community facilities and infrastructure within the vicinity of the site and identify whether there is a need to provide additional facilities to cater for the proposed development. Refer to Section 15.8.2 of Chapter 15: Development Standards.

QHSNO14 – Community Infrastructure Audit SDRAs
To carry out and maintain an audit of community infrastructure for Strategic Development and Regeneration Areas, where appropriate.

The site forms part of the Clongriffin Lands identified under SDRA 1 – Belmayne/Clongriffin and Environs. As part of the proposed development a total area of c. 1,328 sq.m is proposed.

These Internal spaces have been located throughout Zones 7 & 8 and designed to allow for flexibility and adaptability to allow for a variety of uses, which will be determined prior to occupation of the scheme and will assist in providing facilities most required by the future population and community of Clongriffin.

The breakdown of community, arts, social and cultural space is as per below:

Internal Space	**sq.m**
Zone 7 – Community/ Social / Cultural/ Arts 1	781.7 sq.m
Zone 8– Community/ Social / Cultural/ Arts 2	199.6 sq.m
Zone 8– Community/ Social / Cultural/ Arts 3	346.8 sq.m
TOTAL:	**1,328.1 sq.m**

Figure 6.8: Proposed Community, Arts and Cultural Spaces (Source: HJL, 2026)



Fig 6-9: Proposed Community/Cultural/Arts Spaces (Source: HJL,2026)

The total amount of community, arts and cultural space provided (c. 1,328 sq.m) equates to a total of c. 3.05% of the overall net residential floor area (c. 43,982 sq.m) based upon the requirement of DCC in the LRD Opinion (Planning Item 1) to *'provide 50% of the required CUO25 provision attributable to this phase of development within Blocks 7, 8, & 9 and the remaining 50% shall be allocated elsewhere within the Clongriffin area'.*

A mix of sized spaces are provided to ensure flexibility and adaptability of the spaces for future occupants. The LDA will continue to work with DCC with regards to this and future CUO25 spaces.

For further details on existing and proposed community, cultural, arts, and social spaces please refer to the Community, Cultural, Arts & Social Infrastructure Report prepared by Brady Shipman Martin.

6.9 SUNLIGHT AND DAYLIGHT

The overall configuration and design of the proposed development has been influenced by the need to achieve the best possible levels of sunlight and daylight penetration into the development and minimising any impact on the existing permitted development. Detailed Daylight and Sunlight assessment has been carried out on the proposed development by OCSC and is outlined in greater detail in their accompanying Report and summarised below.

- **Internal Daylight**
  The analysis confirms that the majority of spaces not only meet but exceed the recommendations outlined within the Third Edition (2022) methodology, 99.9% for Criterion 1 and 98.9% for Criterion 2 within the proposed development has been achieved.

  In all cases, generous floor to ceiling heights have been designed into the project with glazing areas being increased to amplify the quality of daylight received. Careful consideration has been given to room layout design, generally aiming to allocate storage and circulation areas to the back of rooms, and living spaces to the front - where the highest level of daylight is expected. The results of the analysis are outlined in the accompanying tables.

  Where units are falling below the recommended levels compensatory measures have been identified at the end of each section of the OCSC Report. These include a range of measures including larger private amenity space, larger unit etc.

- **Sunlight**
  In relation to amenity space sunlight, the overall amenity space in the development show compliance with BRE Guide 3rd Edition recommendations, with more than 50% of the total amenity space receiving more than 2 hours of sunlight on March 21st test day.

- **Overshadowing**
  The proposed scheme demonstrates that there is a negligible impact on the surrounding properties when assessed on the 21st March test day.

- **Impact to neighbouring properties**
  The VSC has been assessed for all windows within the surrounding existing and permitted properties. The analysis shows that the majority of windows in the neighbouring buildings achieve more than 27% VSC. For the windows where the VSC falls below the BRE recommended value, the proposed scheme has been assessed against both the previously permitted scheme and a mirror image scenario (which assumes a building of the same height as the adjacent properties on the currently vacant site).

  This comparison demonstrates that no noticeable daylight impact is anticipated for sensitive receptors 1 to 12, as the VSC remains greater than 80% of its former value. Additionally, an internal daylight analysis has been undertaken for a selection of worst-case rooms within adjacent properties where low VSC values are recorded.

The majority of the rooms assessed meet the internal daylight levels required in accordance with BRE guidelines, confirming that no significant adverse impact on surrounding properties is expected as a result of the proposed development.

Based on the above summary along with detailed material provided in the report body and accompanying appendices, it is the opinion of the applicant that the proposed development (a) is aligned with policy in regard to natural light and (b) has given appropriate and reasonable consideration to maximising natural light during the design process.

7. PART V – SOCIAL HOUSING

The Development Plan identifies as a policy:

> *QHSN34- Social, Affordable Purchase and Affordable (cost rental) homes Housing*
> *To promote the provision of social, affordable purchase, affordable (cost rental) homes and rental housing in accordance with the Council's Housing Strategy, Part V of the Planning and Development Act, as amended by the Affordable Housing Act 2021 and government policy as outlined in the DHLGH 'Social Housing Strategy 2020' and support the realisation of public housing.*

The proposed scheme has been designed in a manner to ensure an appropriate mix and location of Part V units. The Part V units are identified and proposed to be incorporated into Block 8B in the northern eastern section of the scheme.

It is proposed to develop 711 no. units at the site, and the Applicant proposes 73 no. Part V units. It is hereby stated that the applicant is committed to providing the full requirement under their Part V obligations. The applicant has engaged will with Dublin City Council and a Part V Validation Letter from DCC Housing accompanies this application.

8. ENVIRONMENTAL CONSIDERATIONS

8.1 BIRDS AND HABITATS DIRECTIVE – APPROPRIATE ASSESSMENT

Under Article 6(3) of the EU Habitats Directive and Regulation 30 of SI no. 94/1997 European Communities (Natural Habitats) Regulations (1997) any plan or project which has the potential to significantly impact on the integrity of a Natura 2000 site (i.e. SAC or SPA) must be subject to an Appropriate Assessment. This requirement is also detailed under Section 177 (U) of the Planning and Development Act 2000-2010.

We refer Dublin City Council to the Appropriate Assessment Screening prepared by Brady Shipman Martin that accompanies this application which concludes that in view of best scientific knowledge that the proposed development, individually or in combination with another plan or project, will not have a significant effect on any European sites in view of the sites conservation objectives. This assessment was reached without considering or taking into account mitigation measures or measures intended to avoid or reduce any impact on European sites.

8.2 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.

As the proposed development is over 500 residential units, being a threshold for mandatory EIA, an Environmental Impact Assessment Report has been prepared for the LRD Application.

9. CONCLUSION

The statement set out herein demonstrates the consistency of the proposed development with the relevant national, regional and local planning policy context.

At a national and regional level, this report and accompanying submission documentation has demonstrated the consistency of the proposed development with National and Local Planning Guidelines and Policy as outlined in this report. Consistency with the policies and provisions of the Dublin City Council Development Plan 2022-2028 which is the key planning policy document at a local level, is also demonstrated within this report.

It is respectfully submitted that the proposed development will provide an appropriate form of high-quality residential development on these strategically identified regeneration lands. This Report demonstrates that the proposed development is consistent with the national, regional and local planning policy framework, and that the proposal will provide for an effective and efficient use of the lands which are highly accessible and well served by public transport.

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional and local planning policies and guidelines and we welcome a grant of permission from Dublin City Council.