LRD Application
Planning Report & Statement of Consistency
For Amendments to Permitted Development at Phase 2 of the Former Royal Liver Site

BSM Est. 1968 Brady Shipman Martin Built. Environment.

Place Making **Built Environment**

Client
The Land Development Agency

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1. INTRODUCTION

This Planning Report has been prepared in support of an LRD Application to Dublin City Council (DCC) (the 'application'), on behalf of The Land Development Agency (the 'LDA' and/or 'applicant'). The subject application site (hereafter called 'the site') is located at the former Royal Liver Assurance Retail Park, Old Naas Road, Dublin 12. The site is bounded by Kylemore Road (R112) to the west; Old Naas Road to the north; Naas Road (R810) to the south; and "Brooks" (Building Providers) to the east.

The development will consist of amendments to a permitted mixed-use development (DCC Reg. Ref.: 4238/19; ABP Ref. PL29S.307804, as amended by DCC Ref.:4436/23. A recent application for amendments to Phase 1 of the scheme, in respect of Block E1 was granted planning by DCC in August 2026 (DCC Reg. Ref.: 5050/26).

The site, since receiving permission for redevelopment has been acquired by the applicant who identified the potential of the site 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. In order to align the scheme with the remit and objectives of the LDA.

The application is being progressed through the LRD process as it involves the amendment of over 100 units. Noting that the parent permission was a standard Section 34 planning application.

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 Planning & Development Act 2000;
- Had a subsequent consultation meeting ('LRD Meeting') with the planning authority pursuant to Sections 32B and 32C of the amended Planning & Development Act 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 Planning & Development Act 2000 inserted under Section 3 of the LRD Act 2021.

A pre-planning consultation meeting, as provided for under Section 247 of the Act, was held with Dublin City Council on 2nd April 2026 (LRD9009/26). Subsequently an LRD Opinion Request was lodged with Dublin City Council on 22nd June 2026, and an LRD Meeting was held on 22nd July 2026. An LRD Opinion was issued by DCC on 18th August 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.

A further meeting took place with DCC to discuss the response to the LRD Opinion items on 10th September 2026. The proposed development 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 development will consist of amendments to a previously permitted mixed-use development (DCC Reg. Ref.: 4238/19; ABP Ref. PL29S.307804, as amended by DCC Ref.:4436/23 and DCC Reg. Ref.: 5050/26). The proposed

amendments relate solely to the permitted Blocks B1, B2, C1, C2, D1 and D2 (identified as Phase 2). No amendments are proposed to any other permitted blocks.

The proposed amendments consist of:

1. *The overall increase of 2 no. units increasing the total overall units from 1196 to 1198. The proposed amended residential development of Block B1, B2, C1, C2, D1 and D2 will consist of a total of 635 no. residential apartments (an increase from 633 no. as permitted), which includes 38 No. Studios, 269 No. 1-Bed, 288 No. 2-Bed- 4-Person and 40 No. 3-Bed- 5-Person, units as follows:*
   - *Alteration of Block B1 from a permitted 11-12-storey building providing for 90 no. apartment units to a 10-storey building providing for 107 no. apartments (17 No. Studios, 54 No. 1-Bed, 35 No. 2-Bed- 4-Person, 1 No. 3-Bed).*
   - *Alteration of Block B2 from a permitted 10 storey building providing for 90 no. apartment units to a 10-storey building providing for 89 no. apartments (43 No. 1-Bed, 37 No. 2-Bed- 4-Person, 9 No. 3-Bed).*
   - *Alteration of Block C1 from a permitted 10-storey building providing for 171 no. apartment units to a 10-storey building providing for 144 no. apartments (47 No. 1-Bed, 88 No. 2-Bed- 4-Person, 9 No. 3-Bed).*
   - *Alteration of Block C2 from a permitted 10-storey building providing for 89 no. apartment units to a 10-storey building providing for 98 no. apartments (61 No. 1-Bed, 37 No. 2-Bed- 4-Person).*
   - *Alteration of Block D1 from a permitted 9-storey building providing for 87 no. apartment units to a 9-storey building providing for 123 no. apartments (47 No. 1-Bed, 63 No. 2-Bed- 4-Person, 13 No. 3-Bed).*
   - *Alteration of Block D2 from a permitted 8-storey building providing for 106 no. apartment units to an 8-storey building providing for 74 no. apartments (21 No. Studios, 17 No. 1-Bed, 28 No. 2-Bed- 4-Person, 8 No. 3-Bed).*
2. *The reconfiguration of internal layouts of each of the blocks has resulted in the minor shift in the block footprints. The permitted podium between Block B2 and Block C1 is removed with additional public realm and connection to the south proposed. The block amendments result in amendments to permitted communal amenity space with the omission of permitted roof terraces on Blocks C1, C2 and D1 and amendment to existing roof terraces on Block B1 and B2.*
3. *Façade modifications are proposed to respond to the revised internal layouts including minor relocation of windows, balconies etc., the introduction of additional balconies, amendments to permitted materiality across all blocks and a revised approach to framing and setting of the primary Naas Rd façade.*
4. *Alteration of the permitted uses and facade at ground floor level and removal of permitted BTR tenant amenity spaces located in Blocks B1, B2, C1 & C2 to provide for a ground floor level that includes:*
   - *Blocks B1-B2: 1 no. retail/café/restaurant unit of c.282 sq.m, 1 no. café unit of c. 82 sq.m, 1 no. community unit of c.315 sq.m, an increased creche of c.600 sq.m (relocated from Block D1) with external amenity space of c. 189 sq.m, 1 no. mobility hub of c. 64 sq.m and associated cycle parking, plant areas and entrances.*
   - *Block C1-C2-D1-D2: 1 no. retail convenience unit of c.834 sq.m, 2 no. retail/cafe/restaurant units of c.89 sq.m and c.145 sq.m, own door residential units, undercroft parking and associated cycle parking, plant areas and entrances.*
5. *Alterations to the permitted undercroft and basement parking areas under Blocks B1, B2, C1, C2, D1, & D2 to include for alterations to permitted layouts of car parking, cycle parking, plant, waste stores and substation locations. The reconfiguration of these areas results in proposed car parking for Phase 2 of 510 no. spaces internally (175 below podium & 335 at basement level) and 4 no. external spaces. A total for Phase 2 of 1,016 no. long stay cycle parking spaces (all located in secure stores) and 88 short-stay cycle parking spaces are provided.*

6. *Amendment of Condition 3 (a) of the parent permission (DCC Reg. Ref.: 4238/19; ABP Ref. PL29S.307804) relating to the Build to Rent (BTR) covenant, and its removal as it relates to Blocks B1, B2, C1, C2 & D1.*
7. *All associated works to accommodate the proposed changes, including alterations to permitted open spaces, internal roads and paths, waste management, visitor cycle parking, ESB Substation locations and associated ancillary works.*

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 & Statement of Consistency should be read in conjunction with the other documentation (reports and drawings) accompanying this application, set out in the schedule included in the Cover Letter to DCC.

2. SITE LOCATION AND CONTEXT

The site (c.3.6 hectares) occupies the former Royal Liver Assurance Retail Park, Old Naas Road, Dublin 12 (Fig 1-1 below). The site is bounded by Kylemore Road (R112) to the west; Old Naas Road to the north; Naas Road (R810) to the south; and "Brooks" (Building Providers) to the east.

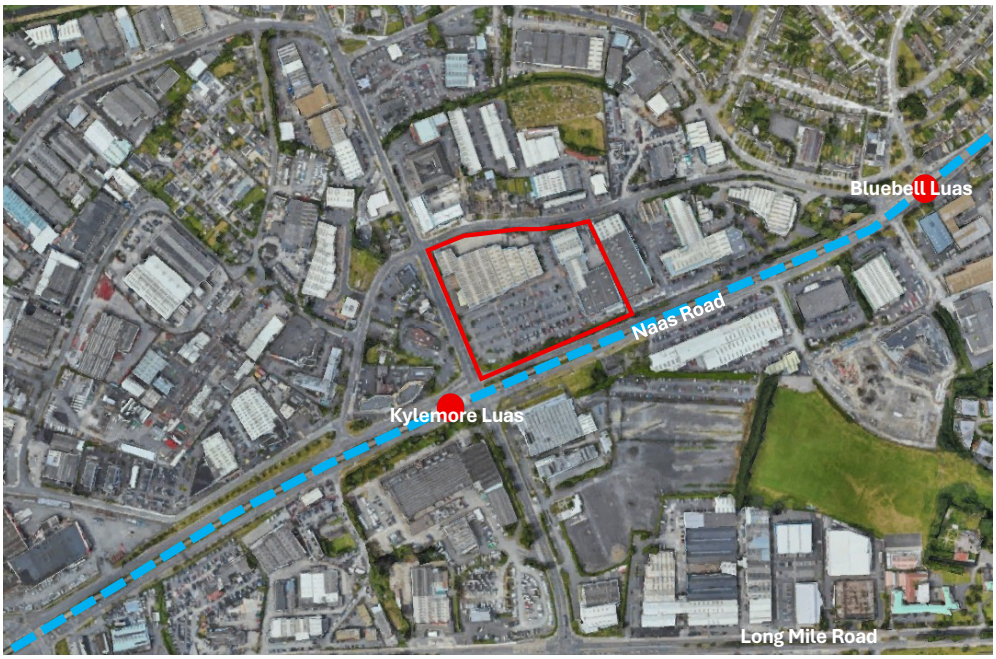


Fig 1-1: Subject Site in Context

The previous retail and other occupiers have vacated the Retail Park and the site is currently not in use, in preparation for commencement of development of the permitted scheme. Demolition of the existing buildings has now commenced.

As set out in the Transport Statement prepared by DBFL Consulting Engineers, the site is strategically located along existing public transport routes including the Luas Red Line, Bus Connects Core Bus Corridor with accessibility to the M50 to the west also.

3. PLANNING HISTORY

There have been two previous applications on the site related to its redevelopment. Since the granting of previous permissions, the site has been acquired by the Land Development Agency who are now seeking further amendments to enable greater optimisation of the site and to better align with the LDA's mandate and objectives.

Parent Permission (DCC Reg. Ref.: 4238/19; ABP: PL29S.307804)
Planning permission was granted on the 20th November 2020 by An Bord Pleanala ((DCC REG. REF. 4238/19; ABP REF. 307804-20) for the redevelopment of the Royal Liver Assurance Retail Park to provide a mixed-use development (comprising residential, office, crèche, community, retail, café /bar/restaurant, medical centre, pharmacy uses) and all ancillary works; comprising 9 No. buildings ranging in height from 7 to 18 storeys over basement level, with a total GFA of c.129,210m2 , plus c. 31,413m2 relating to ancillary car parking, bicycle parking, plant, waste storage facilities, storage, services, including at ground (sub-podium) and basement levels.



Fig 2-1: Permitted Scheme

Amendment Application (DCC Reg. Ref.:4436/23)
Amendments to the Permitted Scheme were granted on the 15th of February 2024. The amendments consisted of changes to the plans such that the parking is allocated on a proportional basis for each phase. The amendment application included removing the substantive basement under Phase 1 (Blocks E1, E2, F1 & F2), retention of the podium parking in support of that phase and inclusion of a new basement car park under Blocks B1 & B2.

For clarity in this report where reference is made to the 'permitted development' it is referring to the development as permitted under DCC Reg. Ref.: 4238/19; ABP: PL29S.307804 and as amended under DCC Reg. Ref.:4436/23.

Phase 1 Amendment Application (DCC Reg. Ref. 5050/26)
An application is currently with DCC for amendments to Phase 1 relating primarily to the replacement of the permitted shared accommodation block in Block E1 for an apartment block containing 98 units. The planning application was lodged with Dublin City Council on the 3rd March 2026 and a request for further information was issued by Dublin City Council on 27th April 2026. The response to RFI, relating to solely drainage/surface water management considerations, was submitted to DCC on 12th June 2026. A Final Grant was issued by DCC on 10th August 2026.

4. PRE-PLANNING CONSULTATION

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).

A formal pre-application meeting on the substance of the proposed development, was held on 2nd April 2026, with attendees from Planning, Transportation Planning, Drainage Departments of Dublin City Council.

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 7 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: An Action Plan on Housing Supply and Targeting Homelessness
- Project Ireland 2040 - National Planning Framework First Revision
- Climate Action Plan 2025
- Eastern and Midland Regional Assembly - Regional Spatial & Economic Strategy (RSES)
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)
- Planning Design Standards for Apartments, Guidelines for Planning Authorities (July 2025)
- Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)
- 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: AN ACTION PLAN ON HOUSING SUPPLY AND TARGETING HOMELESSNESS

Delivering Homes, Building Communities 2025-2030: Action Plan on Housing Supply and target Homelessness is the Government's latest Housing Plan, launched in November 2025 (the Plan). This Plan replaces the previous *Housing for All* (2021) Plan.

The new Plan's aim 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 contains two key pillars:

1. ***Pillar 1: Activating Supply***
   is about removing structural barriers to homebuilding — unlocking land, reforming planning, delivering infrastructure and creating conditions for investment. It also involves boosting construction capacity, adopting modern methods of construction and addressing vacancy and dereliction to bring homes back into use.
2. ***Pillar 2: Supporting People***
   is aimed squarely at making homes accessible and affordable, particularly those who are most at-risk of homelessness or those waiting on our housing lists around the country. It laser focuses on tackling homelessness and precarious living conditions, protecting children and families, increasing social and affordable housing output and seriously improving rental security. It supports homeownership — giving new buyers a chance to put down roots, while revitalising villages, towns and cities

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 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 Royal Liver 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 site has been acquired by the applicant with a view to delivering the permitted scheme of over 1000 units. Phase 1 which is due to commence construction shortly will deliver 563 no. homes (Blocks E1, E2, F1 & F2) and Phase 2 (Blocks B1, B2, C1, C2 D1 & D2) will deliver 635 no. homes, as well as retail, creche, community uses. These will be affordable homes delivered by the LDA.

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

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 (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

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 application seeks to align the scheme with the remit and objectives of the LDA. These amendments subject of this LRD Application seek to bring the scheme into closer alignment with LDA objectives. In overall terms the scheme will provide for an additional 2 no. affordable homes, as part of an overall development of 1,198 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.

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'*. This proposed amendment to permitted development at the former Royal Liver Retail Park is fully aligned with this objective with the LDA working to deliver significant housing in Dublin.

The permitted development, including this proposed amendment is considered consistent with the National Policy Objectives of the NPF 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. CAP25 builds upon previous plans by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings. CAP25 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 CAP25 includes a 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, as part of the wider permitted development, has been designed to assist in achieving actions and policies as set out in the 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.

The permitted development and the proposed amendments have taken into consideration the Climate Action Plan and measures have been included within the design of the development to reduce carbon emissions.

It is noted that the Department of Climate, Energy and the Environment are currently undergoing a public consultation period with regards to the updating the Climate Action Plan, which is planned for publication later this year.

5.1.4 EASTERN AND MIDLAND REGIONAL ASSEMBLY – REGIONAL SPATIAL & ECONOMIC STRATEGY

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 RSES 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 RSES 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 site is located within the Dublin Metropolitan Area (DMA), as designated by the RSES. 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 –

- 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*.' These include City Centre within the M50 and Metrolink - LUAS Corridor.

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 Objectives 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 '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 site is well served by public transport with Kylemore Luas Stop within c.100m from the front of the site and Bluebell Luas stop approximately c.550m from site. In addition, there are multiple bus services located on the Naas Road and Kylemore Road, which both bound the site. The site is located in the 'City Centre within M50' strategic development corridor as designated by the Metropolitan Area Strategic Plan (MASP) which encourages compact growth through providing residential developments in these locations.

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 Sustainable Residential Development and Compact Settlement Guidelines For Planning Authorities (2024) ["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 ranges applicable to Dublin and Cork City and Suburbs. The site on the Naas Road is considered as 'City – Urban Neighbourhood' 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 accessibility the site is classified as a High Capacity Public Transport Node or Interchange being within 1 km of one of the following;

- LUAS Redline (existing Kylemore Interchange circa 60 metres walk), or
- BusConnects Core Bus Corridor,
- LUAS Lucan and Kylemore Dart+ Railway Station.

In this respect, a permitted density of 300+ has already been achieved which exceeds 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)* as they apply to the proposed amendments is set out below in Section 6 of this Report.

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

The Sustainable Urban Housing Design Standards for New Apartments were approved by the Minister for Housing, Planning and Local Government and published in March 2018, and updated in December 2020, July 2023 and most recently superseded by the Planning Design Standards for Apartments Guidelines for Planning Authorities, in July 2025.

It is noted that the 2025 Guidelines are currently subject to a Judicial Review, although they remain in force. The Department has published the Draft National Planning Statement on Planning Design Standards for Apartments 2026 which will ultimately supersede the 2025 Guidelines. The standards contained within both documents are largely the same.
The current design standards came into effect after permission was granted for the parent permission and have been applied subsequently to this subject application. The design standards today generally provide more flexibility for the development of apartments, and the proposed scheme has been designed such that it exceeds the standards set by the current guidelines.

The guidelines update previous guidance and note that '*These Guidelines form a critical part of the suite of measures required to encourage the development of apartments, having regard to the essential role that apartments play in meeting the Government's overall objectives relating to housing supply'.*

The Guidelines have been updated, to address standards around:

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

The site represents a significant redevelopment of underutilised brownfield lands in Dublin and as such represents a project that is fully supported by these Guidelines. The proposed amendments to the permitted development are considered fully compliant with the Apartment Guidelines as set out in detail in Section 6 of this report.

These Guidelines are the subject of a judicial review and therefore for completeness, Section 6 also sets out how the proposed amendments comply with the Dublin City Council Development Plan 2022-2028.

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.

While the permitted development includes heights up to 18 storeys, the proposed amendments, the subject of this application, do not include any proposed increase to building heights and in respect of Block B1 propose a reduced height.

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 Assessment, prepared by DBFL on the permitted development set out how the scheme was in compliance with DMURS.

The proposed amendments to the permitted scheme are the outcome of further interrogation of the permitted design and operations, servicing and access. DBFL Consulting Engineers 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 surrounding road network and enhance it as much 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 DBFL Consulting Engineers demonstrates that the amendments to the permitted 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 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, set out in Chapter 15, is 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 Core Strategy was:

- *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 include the subject lands. Table 2-9 sets out the capacity of existing zoned lands outside of SDRAs. The proposed increase in residential development for the permitted scheme supports the achievement of Core Strategy targets.

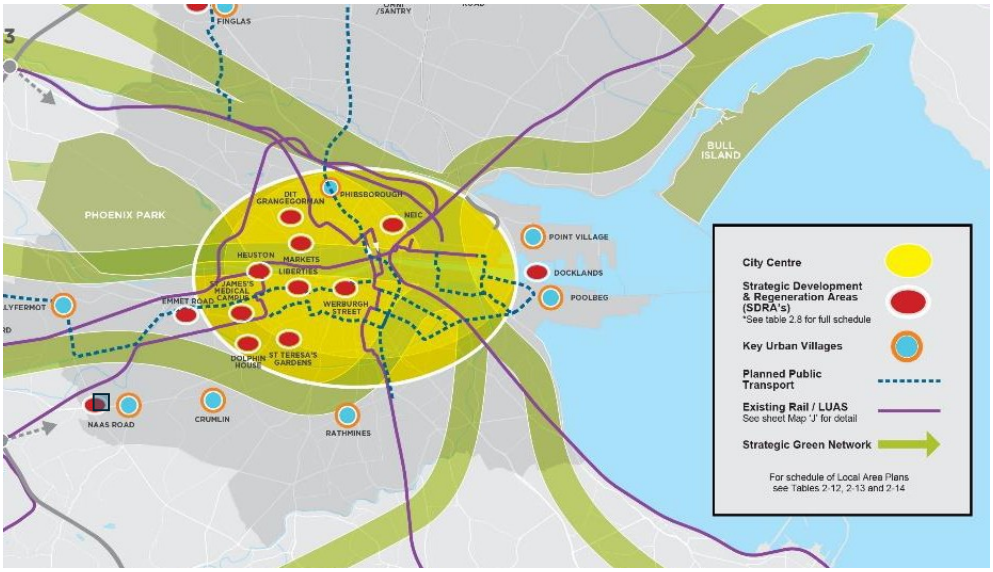


Figure 5-1: Development Plan Core Strategy Map- Site Indicated in Blue Square (Source: DCC).

Overall, the proposed development has had careful regard to the policies and objectives contained within the Development Plan. In particular the permitted development, and the amendments now proposed, 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.*

The proposed amendments will provide for improvements to the permitted affordable homes and enhance the permitted high-quality community and residential environment.

In summary, the proposed development supports the achievement of the above vision by providing improved high-quality residential development in proximity to public transport corridors. This permitted development will foster a new community through its landscaped and open space strategy; mix of unit types and sizes; and provision of residential 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 area 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 permitted provides for over 1000 new residential homes. The amendments the subject of this application seek to bring the scheme into alignment with LDA objectives.

5.2.3 LAND USE ZONING

The 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'.*

The development as permitted 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. The proposed amendments continue to support the zoning objective and ensures the delivery of much needed housing.

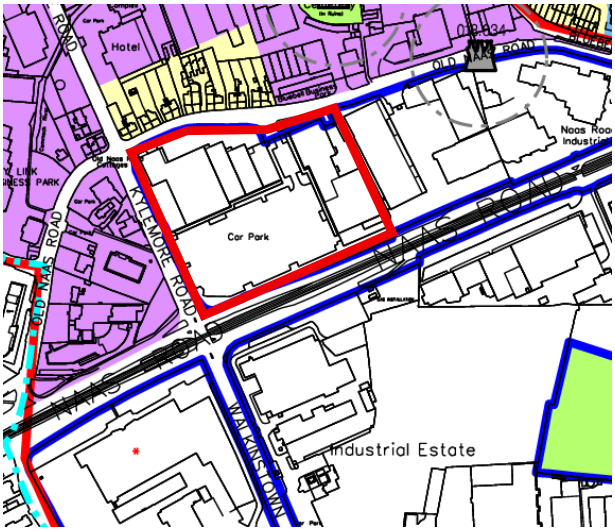


Figure 5-2: Development Plan Zoning Map-(Source: DCC).

5.2.4 STRATEGIC DEVELOPMENT & REGENERATION AREA (SDRA)

The Naas Road Strategic Development & Regeneration Area (SDRA) sets out guiding principles for designated lands which are broken down into 6 no. key re-development sites, namely:

1. Royal Liver Retail Park
2. Motor Distributors Ltd Site (Volkswagen Factory)
3. Nissan Plant Site
4. Bluebell Avenue
5. Former Bluebell Road Regeneration Area
6. Naas Road Industrial Estate and Surrounding Lands

The site forms part of the Royal Liver Retail Park (1) for which the key site-specific issues are identified as follows:

- *To encourage the sustainable redevelopment of this key site as part of the mixed-use core of the Key Urban Village containing office and residential uses with local scale retail and service uses. To provide for a boulevard leading to a pocket park and pedestrian and cycling connections through the site to increase connectivity and deliver the green infrastructure network.*
- *To provide for a sustainable approach to height within the site, with buildings addressing the Naas Road and Kylemore Road providing a strong building line with appropriate heights, marked at the corner with a landmark building of up to 17 storeys. Within the site, heights will be at sustainable level, appropriate to the uses proposed.*
- *Require setbacks to be agreed with Dublin City Council along the main road frontages at Naas Road, along the east side of Kylemore Road to facilitate upgrading of the road to provide for a bus lane, segregated cycleway, greening of the route and footpaths allowing for an attractive and vibrant street environment and to encourage pedestrian and cyclist activity.*

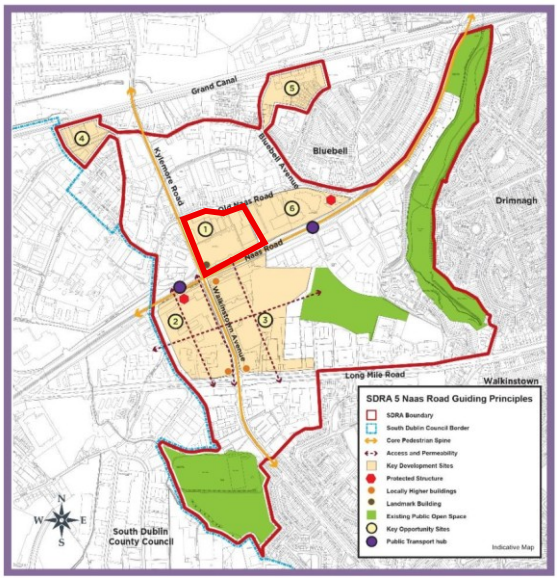


Fig 5-3 SDRA 5 Naas Road (Source: Dublin City Development Plan 2022-2028).

The SDRA Objectives are fully supportive of the permitted scheme and have been influenced by the permitted scheme. The proposed amendments, in enhancing the permitted scheme, continue to deliver the specific objectives under the SDRA.

5.2.5 CITY EDGE PROJECT STRATEGIC FRAMEWORK

The City Edge Project is a Strategic Plan across both Dublin City Council and South Dublin County Council which aims to reimagine a number of areas to the east of Dublin City, including Naas Road, to provide for 40,000 new homes and 75,000 new jobs. The Overarching Vision of the City Edge Strategic Framework is:

"to support the long-term, resilient growth of the Dublin region by making the most of City Edge. Create a major new Urban Quarter on the edge of Dublin City, providing much needed new homes and employment space for the city, whilst ensuring the area's rich industrial history can continue to play an important role into the future".

Under the Framework, the site is strategically located to the south of a Major Centre, at the intersection of Naas Road and Kylemore Road. The subject application, which results in the delivery of 1,198 No. residential homes (an increase from the 1,098 No. homes and 203 shared accommodation units as originally permitted under the parent permission) represents a major contribution to securing the 40,000 new homes as envisaged by the Framework Plan.

The overall development will act as a catalyst for the wider regeneration of the area and the implementation of the City Edge Project.

The proposed transport upgrades as set out in the City Edge Project, including the extension of the Luas Red Line and provision of a high capacity (public transport) orbital route on Kylemore Road, would further support a modal shift from private car to public transport for prospective residential and commercial communities at the subject site. We refer the Council to The Transportation Overview prepared by DBFL Consulting Engineers, which sets out further relevant details with respect to this Framework Plan.

6. PROPOSED DEVELOPMENT

6.1 OVERALL DESIGN RATIONALE & AMENDMENTS

Since the granting of the Parent Permission the Land Development Agency has acquired the site. A recent planning application has been granted by Dublin City Council (DCC. Reg. Ref.: 5050/26) in respect of Phase 1 (Blocks E1, E2, F1 & F2) which primarily relates to the replacement of the permitted shared accommodation block, in Block E1, with 98 residential units (DCC. Reg. Ref.: 5050/26) as well as other amendments to basement extents, services and road layouts etc, permitted phasing. Phase 1 is due to commence construction in 2026. The LDA have subsequently reviewed Phase 2 (Blocks B1, B2, C1, C2 & D1, D2) and is now proposing amendments which seek to optimise the delivery of the scheme and bring the scheme into alignment with LDA objectives.

The key amendments are set out below.

6.1.1 ALTERATION OF PERMITTED UNIT MIX & LAYOUT

As set out above, and summarised in the Architects Design Statement, a review of apartment typologies and mix has taken place to ensure alignment with the LDA typologies. This exercise has resulted in an alteration to the layouts of the permitted Blocks in Phase 2 and the addition of 2 no. units within the existing, and in places a reduced,

footprint and massing. This exercise has allowed a minor reduction in overall floorspace, resulting in the blocks narrowing slightly which provides for improved daylight and sunlight levels within the scheme. The blocks are amended as follows:

- Alteration of Block B1 from a permitted 11-12-storey building providing for 90 no. apartment units to a 10-storey building providing for 107 no. apartments (17 No. Studios, 54 No. 1-Bed, 35 No. 2-Bed- 4-Person, 1 No. 3-Bed).
- Alteration of Block B2 from a permitted 10 storey building providing for 90 no. apartment units to a 10-storey building providing for 89 no. apartments (43 No. 1-Bed, 37 No. 2-Bed- 4-Person, 9 No. 3-Bed).
- Alteration of Block C1 from a permitted 10-storey building providing for 171 no. apartment units to a 10-storey building providing for 144 no. apartments (47 No. 1-Bed, 88 No. 2-Bed- 4-Person, 9 No. 3-Bed).
- Alteration of Block C2 from a permitted 10-storey building providing for 89 no. apartment units to a 10-storey building providing for 98 no. apartments (61 No. 1-Bed, 37 No. 2-Bed- 4-Person).
- Alteration of Block D1 from a permitted 9-storey building providing for 87 no. apartment units to a 9-storey building providing for 123 no. apartments (47 No. 1-Bed, 63 No. 2-Bed- 4-Person, 13 No. 3-Bed).
- Alteration of Block D2 from a permitted 8-storey building providing for 106 no. apartment units to an 8-storey building providing for 74 no. apartments (21 No. Studios, 17 No. 1-Bed, 28 No. 2-Bed- 4-Person, 8 No. 3-Bed).

As set out in the Housing Quality Assessment (HQA) provided by Henry J Lyons Architects, and Section 6.2 of this report, all units meet the requirements of the Planning Design Standards for Apartments: Guidelines for Planning Authorities, 2025.

6.1.2 ALTERATION OF PERMITTED MASSING & FOOTPRINT

As identified in the proposed amendments, the majority of the changes are occurring within the permitted massing and heights apart from Blocks B1 and C2 where reduced height is proposed and within Block C1 and Block D1/D2 where there are minor changes to the permitted building footprint. The podium between Block B2 and Block C1 is removed, as noted in Section 6.1.3 below.



Figure 6-1: Permitted & Proposed Building Heights (Source: HJL).

As indicated on the above graphics, and as set out in the Architects Design Statement, the permitted heights and massing remain as permitted other than a minor decrease in the height of Block B1 from 11-12 storeys to 10 storeys.

It is considered that the proposed reduction, is positive in terms of daylight and sunlight into adjacent units and amenity spaces and doesn't impact the visual appearance of the frontage onto the Naas Rd.

6.1.3 OMISSION OF BTR COVENANT FOR PHASE 2 UNITS

The planning permission for the parent scheme (DCC Reg. Ref.: 4238/19; ABP Ref. PL29S.307804) includes Condition 3 which relates to the management, operation and required legal covenants for the scheme, as it was permitted as a Build-To-Rent scheme. Condition 3 states:

a) *The buildings identified on the submitted plans and particulars as Blocks B1, B2, C1, C2, D1, E1, E2, F1 and F2 containing 992 number residential units and 203 number shared accommodation units shall operate in accordance with the definition of Build-to Rent developments as set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (March 2018) and shall be used for long term rentals only.*
b) *Prior to the commencement of development on site the developer shall submit for the written agreement of the planning authority details of the following in respect of each of the blocks permitted as the Build-to-Rent developments:*
c) *The management company established to manage the operation of the development together with a detailed and comprehensive Build-to-Rent Management Plan which demonstrates clearly how the proposed Build-to-Rent scheme will operate.*
d) *A covenant or legal agreement which confirms that each block shall remain owned and operated by a single institutional entity as a Build-to-Rent scheme for a minimum period of not less than 15 years and that no individual residential units shall be let or sold separately in that period.*
e) *Prior to expiration of the 15-year period referred to in the covenant, the owner shall submit and agree in writing with the planning authority details of the ownership and management structures for the continued operation of the blocks as Build-to-Rent schemes. Any proposed amendment or deviation from the Build-to-Rent model authorised in this permission for those blocks shall require a separate grant of planning permission.*

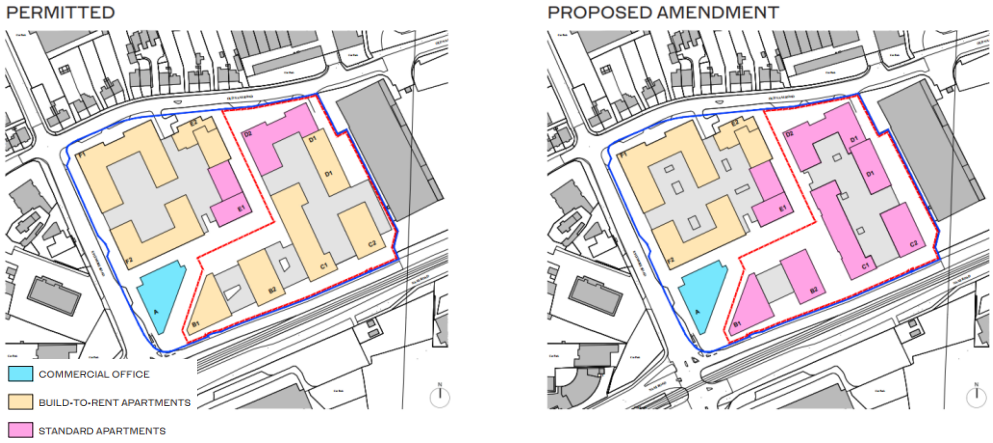


Figure 6-2: Permitted & Proposed Block Type (Source: HJL).

The proposed amendments to the permitted B1, B2, C1, C2 & D1, noting that D2 was not proposed as BTR in the grant of permission, in respect of unit layouts has been prepared in compliance with the 2025 Guidelines. As such

Commented [KR1]: This is unclear. Please review.

it is proposed to omit the BTR requirements for these blocks to afford the LDA greater flexibility in housing typologies and tenures.

Commented [KR2]: It would be helpful to justify why they need this flexibility.

As such the proposed amendment of Condition 3 (a) is requested as follows:

a) *The buildings identified on the ~~submitted~~ amended plans and particulars as Blocks ~~B1, B2, C1, C2, D1, E1,~~ E2, F1 and F2 containing ~~992~~ 465 number residential units ~~and 203 number shared accommodation units~~ shall operate in accordance with the definition of Build-to Rent developments as set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (March 2018) and shall be used for long term rentals only.*

Block E1 has been repalced under DCC Reg. Ref.: 5050/26, from shared accommodation to apartments, under the 2025 Guidelines, and as such is no longer a BTR Block. The proposed amendments to Condition 3a reflect this also.

The proposed amendment to tenure type will result in c.39% of the overall scheme remaining as BTR, and c.61% of the scheme being standard residential and available for occupation under mixed tenures. As discussed in Section 6.1.3 below the relevant internal shared amenity space for the BTR units, in Phase 2 only, is replaced with alternative ground floor uses. The internal shared amenity space for the BTR units in Phase 1, located in Block F1 and F2 will remain for those residents (provided at 1.2sq.m per BTR unit).

6.1.4 AMENDMENT OF GROUND FLOOR LAYOUT AND USES

As identified above, the shift from the majority of units within the scheme from BTR to standard residential has meant that the significant BTR internal shared amenity space, provided at ground floor level underneath Blocks B1, B2, C1 and C2 is no longer required. It's removal in tandem with the removal of the podium between Blocks B2 and C1 has required a relook at the ground floor layout and uses.

The removal of the podium has provided for additional public realm, from the central space to the Naas Rd frontage, and resulted in additional building frontage to activate. This couple with the internal reconfiguration of the apartment layouts and associated cores and plant areas has resulted in a revised ground floor layout.

The key amendments proposed at ground level through the scheme include:

- Removal of BTR internal communal amenity space, provided at ground floor level underneath Blocks B1, B2, C1 and C2.
- Relocation of the permitted creche from ground level of Block D2 to below Blocks B1 and B2 and increase in size. This provides for an increased capacity and better external space for the creche.
- Reduction in the permitted anchor unit (supermarket) located below Block C1 and C2. Relocated to Naas Rd frontage.
- Increase in permitted community unit size
- New street creating additional link between Naas Road and Plaza; additional retail frontage; removal of podium area.
- Basement bicycle stores moved to Ground Floor Level.
- Own-door access units in place of former Creche location in Block D2.
- Ground floor/podium carpark expanded south under Blocks C1, C2 and D1, D2.
- Introduction of a mobility hub.

- Introduction of an additional restaurant/retail/café unit on the corner of Block B1 at the main pedestrian entryway to the scheme.

PERMITTED



Figure 6-3: Permitted Ground Floor Uses (Source: HJL)



Figure 6-4: Proposed Ground Floor Uses (Source: HJL)

The permitted development, in respect of Phase 2, included for:

PERMITTED (PHASE 2 ONLY)

Block	Use	Area (Sq.m)
B1, B2, C1, C2	BTR Amenity Space	4118
D2	Creche	462
B2	Community	269
C1	Retail (Supermarket)	2360
C1	Café/Restaurant/Bar	177

As outline above, the proposed amendments, alter this to:

Block	Use	Area (Sq.m)
	BTR Amenity Space	0
B1	Mobility Hub	63.8
B1	Retail/Café/Restaurant	282
B1-B2	Creche	600
B2	Community	314
B2	Café	81
C1	Retail (Supermarket)	834
C1	Retail/Café/Restaurant	88
C1	Retail/Café/Restaurant	165

Uses	Total Area	+/-
BTR Amenity	0	-4118
Creche	600	+138
Community	314	+ 45
Retail (Supermarket)	8324	-1526
Retail/Café/Restaurant	596	+ 419
Mobility Hub	64	+ 64

In respect of the overall scheme this results in an overall provision as set out below and as indicated in Fig 6.4 above:

Uses	Total Area
BTR Amenity	566
Creche	600
Community	314
Retail (Supermarket)	8324
Retail/Café/Restaurant	972
Medical Centre	226
Pharmacy	125
Mobility Hub	64

It is considered that the proposed amendments provide for an improved offering, and animation of the ground floor, located around the central public realm. In respect of the proposed reduction in the retail supermarket, it is considered that the smaller unit will still provide a significant offering to future residents. The larger unit was of a scale that is beyond the requirements of many retail occupiers in the Irish market and without a significant quantum of parking for shoppers, would be difficult to let. The potential of a unit of this scale remaining vacant would have a significant impact on the animation and provision of services for the scheme. A retail impact assessment is provided in Appendix 1 of this report which highlights the accessibility to existing retail in the area, some of which has been delivered since the granting of permission for the Royal Liver scheme.

A complementary Retail/Commercial Report is provided by Cushman & Wakefield which concludes:

The proposed reduction from the previously approved large-format convenience store of over 2,000 sq.m to a smaller-format retail unit is considered both appropriate and necessary, having regard to the operational requirements of modern food retailing and the physical constraints of the site. Convenience stores of this scale typically serve a wider catchment area and require a significant level of customer parking, usually in excess of 100 spaces, to support customer demand and retailer operational expectations. Such a level of parking cannot be satisfactorily accommodated within the site without compromising other key development objectives or exceeding Development Plan standards. In this context, the originally approved store size is no longer considered an optimal or deliverable solution.

The proposed store format represents a more sustainable and commercially realistic retail model, reflecting contemporary retailer requirements while continuing to provide a strong convenience offering for the local catchment. Retail operators commonly trading from stores of a comparable scale include Tesco Metro/Local, larger Spar stores, and Musgrave Group brands such as Centra and smaller-format SuperValu stores. These formats are well-established in serving day-to-day shopping needs, providing a broad grocery offer and associated services while operating successfully with a more proportionate level of parking and site infrastructure. Accordingly, the revised retail strategy better aligns the scale of development with both market demand and the practical characteristics of the site, whilst ensuring the delivery of a viable and attractive retail offering for the surrounding community.

6.1.5 REDUCTION OF PERMITTED BASEMENT EXTENT & ASSOCIATED PARKING

The proposed amendments include for the reduction in the extent of the permitted basement under the Phase 2 blocks.



Figure 6-5: Permitted & Proposed Ground Floor Uses (Source: HJL)

These amendments are summarised as follows:

1. The basement is reduced by 2700m2, by omitting the basement under the plaza, north-south street and west of the Block B1 core.
2. Revised parking layouts, plant areas and cores throughout basement.
3. Basement bicycle stores moved to Ground Floor Level.

At ground level, the reduction in the retail supermarket unit, has facilitated the relocation of some parking from the basement areas to ground level, below podium which has allowed for the reduction in basement areas as identified above.

The permitted development provides a total of 368 residential car parking spaces within Phase 2, located at basement and ground floor below podium, equating to a residential parking ratio of approximately 0.58 spaces per residential unit for Phase 2. The proposed amendment revises the layout of the basement and below podium areas providing 514 no. car parking spaces. This proposed provision comprises 510 no. spaces internally (335 no. at basement level and 175 no. at undercroft/podium level), and 4 no. external spaces. A total of 415 car parking spaces has been provided for the residential element of the development, equating to an increased residential car parking ratio of 0.65 spaces per residential unit in Phase 2.

The recent application amending Phase 1, also made amendments to parking areas and proposed a reduction in permitted parking from 0.38 to 0.31 for Phase 1 of the development. When considered as part of the overall scheme, which was the basis for the permitted parking strategy i.e. parking is provided for the entire scheme, the overall parking ratio for residential development is 0.49 spaces per unit which is in line with the parent permission and offsets the reduction in residential parking in the Phase 1 amendment. A Car Parking Plan is prepared by DBFL and included as part of the application.

It should also be noted that the Phase 2 car parking provision includes 56 office parking spaces that were previously permitted as part of the 2023 planning application. While these spaces are intended to serve the Phase 3 office development, they will be delivered as part of the Phase 2 works.

The details and justification for this is set out in the Traffic & Transport Report prepared by DBFL Consulting Engineers.

Cycle parking for the Phase 2 long stay, including residential units and commercial uses, is provided at ground level, below podium and is provided in line with current Development Plan standards. In terms of short stay spaces, as reduced allocation is put forward in the accompany DBFL Traffic & Transportation Report. An additional 70 no. spaces are provided, in addition to the 302 spaces provided under Phase 1 and 10 under Phase 3. This amounts to a total of 382 spaces for the entire masterplan.

This quantum of 382 visitor bike spaces whilst representing a substantial quantum of bike parking is acknowledged to be below the DCC standards however it is considered that the provision of 382 dedicated short-term spaces distributed across the masterplan lands in convenient locations represents an appropriate considered quantum for the following reasons;

- The demand greater than 382 is very unlikely to be generated at the same time.
- The allowance for dual usage between residential and non-residential demands being generated at different times of the day and days of the week.

This item was considered acceptable by DCC at LRD Opinion stage noting there was a request for a minor increase from 60 to 70 which has been accommodated.

6.1.6 FAÇADE & MATERIALITY

The extant permitted scheme is characterised by a full height, building envelope wrap-around balcony framing system in two tones (black (B1) and 'Corten' steel (B2,C1,C2).

As part of the Phase 02 amendments, HJL has undertaken a comprehensive review of the facade design, considering the scheme as a whole. The facades must be considered as part of the overall development, delivering a high-quality architectural response while maintaining appropriate cost efficiency to support the viability of the project and the delivery of affordable purchase and cost-rental homes.

The following alterations are proposed.

- The updated proposal maintains 'brick' as the principal facade material.
- The urban design and facade material approach extends the language of the phase 1 blocks to the Naas Road, building on the quality and character of the overall development.
- The formality of the 1+3 rhythm in the previously permitted version is retained (B1 as a lighter brick, and B2,C1,C2 as a contrasting darker tone). This approach eschews the temptation to present more variety in the Naas road elevation allowing the formal presentation of this new urban 'district'.
- The feature framing to the Naas Road is reconfigured, the ground floor is opened up to enhance the public realm and the framing at upper levels has been altered to strengthen the concept of vertical transition and facade layering when read from any view point along the Naas Road.

The proposed amendments have sought to address the concerns raised by DCC at pre-planning stage.

The above is set out in more detail in the Architects Design Statement and is supported by Photomontages prepared by Modelworks and a Visual Impact Overview Note prepared by Mitchell & Associates.

6.2 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* which are the standards included in the Dublin City Development Plan 2022-2028.

The 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.

The Department has published the Draft National Planning Statement on Planning Design Standards for Apartments 2026 which will ultimately supersede the 2025 Guidelines. The standards contained within both documents are largely the same.

The current design standards came into effect after permission was granted for the parent permission and have been applied subsequently to this subject application. The design standards today generally provide more flexibility for the development of apartments, and the proposed scheme has been designed such that it exceeds the standards set by the current guidelines.

6.2.1 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 existing permitted mix for the overall permitted development, as most recently permitted under Reg. Ref.: 5050/26, is as follows:

PERMITTED (OVERALL)

Block	Studios	1 Bed	2 Bed (4P)	3 Bed	Total
B1	0	54	36	0	90
B2	4	32	54	0	90
C1	0	100	71	0	171
C2	0	34	55	0	89
D1	0	38	49	0	87
D2	0	21	64	21	106
E1	9	40	49	0	98
E2	0	47	33	0	80
F1	0	104	86	14	204
F2	0	73	108	0	181
	13	543	605	35	1196
%	1.1	45.4	50.6	2.9	100.0

This application, for amendments to Phase 2, results in the following overall mix:

PROPOSED (OVERALL)

Block	Studios	1 Bed	2 Bed (4P)	3 Bed	Total
B1	17	54	35	1	107
B2	0	43	37	9	89

C1	0	47	88	9	144
C2	0	61	37	0	98
D1	0	47	63	13	123
D2	21	17	28	8	74
E1	9	40	49	0	98
E2	0	47	33	0	80
F1	0	104	86	14	204
F2	0	73	108	0	181
	47	533	564	54	1198
%	3.9	44.5	47.1	4.5	100.0

When considered in respect of Phase 2 only, as the subject of this application the permitted and proposed is as below:

PERMITTED (PHASE 2 ONLY)

Block	Studios	1 Bed	2 Bed (4P)	3 Bed	Total
B1	0	54	36	0	90
B2	4	32	54	0	90
C1	0	100	71	0	171
C2	0	34	55	0	89
D1	0	38	49	0	87
D2	0	21	64	21	106
	4	279	329	21	633
%	0.6	43.9	51.8	3.3	99.7

PROPOSED (PHASE 2 ONLY)

Block	Studios	1 Bed	2 Bed (4P)	3 Bed	Total
B1	17	54	35	1	107
B2	0	43	37	9	89
C1	0	47	88	9	144
C2	0	61	37	0	98
D1	0	47	63	13	123
D2	21	17	28	8	74
	38	269	288	40	635
%	6.0	42.4	45.4	6.3	100.0

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 overall scheme unit mix is therefore compliant with Section 15.9.1.

6.2.2 FLOOR AREAS

The proposed floor areas are in compliance with the requirements of SPPR 2 of the 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, within Phase 2, meet or exceed the minimum standards for apartment sizes under SPPR 2. This is set out in the HQA (Housing Quality Assessment) prepared by Henry J Lyons.

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 amendments to Phase 2 includes for 27.7% 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 the scheme Architects 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 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.

6.2.3 ASPECT

The 2025 Guidelines require that a minimum of 25% of the overall number of units in a scheme should be dual aspect:

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.

They further state:
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 amendments result in the Phase 2 units having c. 34% of dual aspect units, in compliance with the 2025 Guidelines standards. When considered as part of the wider permitted development the overall dual aspect is also c. 34%.
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 permitted scheme was assessed and granted on the basis of a requirement for 33% dual aspect units. As such the proposed amendments ensure that the scheme remains in excess of this requirement and as such is compliant with the Development Plan standards.

6.2.4 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 located at ground level are compliant with the 2025 Guidelines. Detailed daylight assessment has been carried out on the proposed amendments by O'Connor Sutton Cronin 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 amendments are consistent with the permitted scheme, ensuring that commercial floor to ceiling heights are increased at ground floor level. Own door units provided at ground level also have an increased floor to ceiling height in compliance with the Development Plan.

6.2.5 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 amendments to the layout and typologies in the Phase 2 blocks, has sought to minimise the number of cores and maximise the number of apartments with the blocks ranging from 9-11 units per core.

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**.**

As noted, the Phase 2 Blocks have units per core in the range of 9-11, and are therefore in compliance with the Development Plan.

6.2.6 STORAGE

The 2025 Guidelines refer to Appendix 1 which sets out minimum storage requirements as follows:

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

All units proposed to be amended in Phase 2 meet or exceed the requirements, as demonstrated in the accompanying HQA.

The proposed amendments are also in compliance with the requirements of Section 15.9.6 of the Development Plan. It is therefore considered that all of 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.

6.2.7 PRIVATE AMENITY SPACE

Section 3.8 of the 2025 Guidelines refers to Appendix 1 which sets out minimum private open space requirements as follows:

- 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 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'*.

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. The permitted development, included for units without private amenity space, and in lieu additional communal amenity space was provided throughout the scheme. As the proposed amendments are seeking to remove the BTR covenant, all units have now been provided with private amenity space in compliance with the standards as set out in 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. As part of the original planning application, as was permissible for BTR units, some units were not provided with private amenity space, and additional communal amenity space was provided. All units in Phase 2 now have private amenity 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.

6.2.8 COMMUNAL AMENITY SPACE

Section 4.3 of the 2025 Guidelines refers to Appendix 1 which sets out communal amenity space requirements as follows:

- 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 and at roof level. Phase 2 as now proposed provides for an excess of communal external amenity space, when compared to the 2025 Guidelines. The 2025 Guidelines require 3,873 sq.m of space to be provided and 3,977 sq.m is provided.

The permitted development provided for a significant over provision of amenity space to compensate for the non-provision of private amenity space for all apartments. As noted in Section 6.2.7 above all apartments in Phase 2 now have private amenity space provided and as such the communal amenity spaces at roof level have been reduced in some blocks. Roof terraces are proposed for removal from Blocks C1, C2 and D1 and amendment to roof terraces on Block B1 and B2, noting that the previously provided podium courtyard between Block B1 and C1 has been removed.

As set out in the LRD Opinion, DCC raised concerns about the perceived loss of communal amenity space as a result of the reduction in roof terraces. As noted above the permitted scheme significantly over provided for communal amenity as a compensatory measure for units in the permitted scheme which did not have private amenity space. As such the removal of roof terraces is not a reduction in amenity space but rather a redistribution of some communal amenity space to private amenity space.

Every apartment is now provided with private amenity space while also benefitting from access to communal amenity space in excess of the required standards.



Figure 6-6: Amenity Spaces - Hours of Sunlight on March 21st (Source: OCSC)

As identified in the Daylight, Sunlight & Overshadowing Report prepared by OCSC, and in Fig 6-6 above, all amenity spaces comply with the BRE 209, 3rd Edition, regarding sunlight recommendations, as at least half the space receive at least 2 hours of sunlight on March 21st.

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.

6.2.9 PUBLIC OPEN SPACE

The Development Plan sets out requirements for 10% Public Open Space for SDRAs. The open space strategy as per the permitted development included for c.17% of the site area. As a result of the removal of the podium between B2 and C1, the open space has increased as this area now form part of the public realm of the scheme. Open Space is now provided at c.18.6%.

6.3 PLOT RATIO & SITE COVERAGE

The Development Plan 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 permitted scheme has a plot ratio of 3.39 and the scheme with the permitted amendments reduces slightly at 3.24.

The Development Plan sets an indicative site coverage standard of 50-60% for 'Regeneration Area'. The permitted scheme has a site coverage of 62.4% and the scheme with the permitted amendments reduces slightly to 59.7%.

While the plot ratio and site coverage figures of the proposed development are at the upper range or slightly in excess of the indicative levels they remain in line with the permitted development.

6.4 HEIGHT & DENSITY

Appendix 3 of the Development Plan sets out a building height strategy for the city. It notes that consideration of what constitutes a tall building can be subjective and also depends on surrounding context. The Development Plan 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 schemes 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.*

The permitted development aligns with both the categories of Locally Higher Buildings and Landmark/Taller Buildings. The predominant height in the permitted development is 7-10 storeys with Block B1 being 11-12 storeys and Block A being 18 storeys. 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'.

The proposed amendments to Phase 2, retains permitted heights and in a number of instances reduces heights. As set out in Section 6.1.1, and in the Architects Design Statement, the permitted heights and massing remain as permitted other than a minor decrease in the height of Block B1 from 11-12 storeys to 10 storeys. It is considered that the proposed reduction, is positive in terms of daylight and sunlight into adjacent units and amenity spaces and doesn't impact the visual appearance of the frontage onto the Naas Rd. A summary of the landscape and visual impact considerations of the proposed amendments has been prepared by Mitchells & Associates, who prepared the LVIA for the permitted development.

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 100-250 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 of 50 dph to 250 dph (net) (dwellings per hectare).

The permitted overall development has a density of 344 units per hectare[1] (or 291 excluding the shared accommodation units). This was noted in the An Coimisiún Pleanala Inspector's Report on the parent permission as representing *'a significant increase on prevailing residential density in the area. Development Plan policy and national policy permit for increased densities along public transport corridors'.* The Report also noted at the time that there was no upper limit imposed by policy. Whether the density was appropriate or not was considered to be tied to wider site design considerations, which ultimately was accepted by ACP.

The proposed amendments to Phase 1, the replacement of shared accommodation units with apartment units, resulted in a density of 317 which represents a decrease on the 344 identified by ACP or an increase on the 291 as identified by ACP which didn't include the shared accommodation, and for which the amendment replaced with residential units.

Since the granting of the Parent Permission, the Sustainable and Compact Settlement Guidelines, in Appendix B has introduced a new method of calculating density in contrast to the more traditional method of the total number of units divided by site area. This method removes non- residential uses and works on the apportionment of residential GFA as a portion of the development. Using this method the original permitted scheme had a density of 375 (including the Shared Accommodation) and the proposed Phase 1 amendments resulted in a minor increase to 379.

Using the same metrics, the proposed amendments now proposed to Phase 2 retain the density levels, as set out in the Phase 1 amendments, as there is only an overall increase in the scheme by 2 units.
As put forward, and accepted by DCC, in the Phase 1 Amendment application, while the Development Plan identifies that *'There will be a general presumption against schemes in excess of 300 units per hectare'* it does note that *'schemes in excess of this density will be only be considered in exceptional circumstances where a compelling architectural and urban design rationale has been presented'.* This was equally noted by the Inspector in their consideration of the parent permission.

[1] Noting ACP Inspector's Report referred to units per hectare (uph) and the current Sustainable and Compact Settlement Guidelines refers to dwellings per hectare (dph).

It is considered that the permitted and now amended scheme has demonstrated a compelling architectural and urban design rationale noting DCC, in the Planner's Report stated:

- *'it is considered that the proposal is consistent with the Naas Road LAP which outlines the development potential of the site and the need for a landmark building. It is further considered that the design and scale of the proposed development has been well considered and evolved in accordance with best practice to provide the most sustainable mix of uses on site'.*
- *'The proposal will deliver a high density development in a strategic location close to major transport infrastructure enabling the city 'to accommodate a greater proportion of its growth within its metropolitan boundaries through regeneration and redevelopment projects'.*
- *'in principle a high density residential development in this area is considered acceptable and necessary to achieve national objectives as set out in the National Planning Framework'.*

Further in their consideration of the scheme, the An Coimisiún Pleanala Inspector's Report noted that *'Whether the density is appropriate at this location is tied to a number of facts, appropriateness of design and scale, visual impact, overall quality of the development and adjoining amenities. These aspects of the proposal are to be explored in the later sections of this report. Pending assessment of such factors the provision of increased densities on the appeal site is appropriate'*. With regards to these other considerations ACP found that *'The appeal site due to its urban context is well able to absorb the visual impact of the proposed development and would provide for a development of a stronger urban character that would have an acceptable visual impact. I would consider that external finishes, fenestration and architectural character of the proposal is contemporary in nature and would be of an acceptable quality in terms of urban design and overall visual impact at this location'.*

The proposed amendments are not seeking to increase the physical quantum of development proposed and are primarily amending the internal elements of permitted blocks, with limited amendments in massing terms and as such the density of development is not increasing beyond what is already permitted.

As set out in Section 6.6 below the proposed amendments, which are largely contained with the permitted massing and height, and include for reduction in some permitted heights, results in a high level of daylight and sunlight levels throughout the scheme. This indicates that even with high density levels the scheme is providing for a high level of residential amenity.

6.5 ACCESS, CAR & CYCLE 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 identifies 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*.

The permitted development provides a total of 368 residential car parking spaces within Phase 2, located at basement and ground floor below podium, equating to a residential parking ratio of approximately 0.58 spaces per residential unit for Phase 2. The proposed amendment revises the layout of the basement and below podium areas providing 514 no. car parking spaces. This proposed provision comprises 510 no. spaces internally (335 no. at basement level and 175 no. at undercroft/podium level), and 4 no. external spaces situated along the north-eastern

boundary on the southern side of Old Naas Road and adjacent Blocks C&D. A total of 419 car parking spaces are provided for the residential element of the development, equating to an increased residential car parking ratio of 0.66 spaces per residential unit in Phase 2.

The recent application amending Phase 1, also made amendments to parking areas and proposed a reduction in permitted parking from 0.38 to 0.31 for Phase 1 of the development. When considered as part of the overall scheme, which was the basis for the permitted parking strategy i.e. parking is provided for the entire scheme, the overall parking ratio for residential development is 0.49 spaces per unit which is in line with the parent permission and offsets the reduction in residential parking in the Phase 1 amendment. A Car Parking Plan is prepared by DBFL and included as part of the application.

It should also be noted that the Phase 2 car parking provision includes 56 office parking spaces that were previously permitted as part of the 2023 planning application. While these spaces are intended to serve the Phase 3 office development, they will be delivered as part of the Phase 2 works.

Based on the site accessibility, the relevant guidelines and international best practice, this is considered an appropriate 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 DBFL Consulting Engineers.

Secure cycle parking is provided in line with the Development Plan cycle parking standards which are in line with those set out in 'Design Standards for New Apartments' Guidelines (DSFNA) published by the Government in 2023. A total of 1016 long-stay secure parking is provided, with 1004 being for residents and 12 being for staff of the various commercial units) and 88 short-stay are provided. The 88 spaces are additional to the 302 spaces provided as part of the Phase 1 proposal. The 88 spaces provided will include for both phase 2 and phase 3. An addition of 10 extra spaces is also provided as part of LRD opinion.

This quantum of 390 total visitor bike spaces whilst representing a substantial quantum of bike parking is acknowledged to be below the DCC Development standards for Bicycle. Nevertheless, it is noted that;

- the Compact Settlement Guidelines only requests a generic "*Visitor Space to be provided*" suggesting an allowance, such as the proposed 390 visitor bike spaces, opposed to a specific quantum identified.
- The permitted 2023 scheme (Planning Ref. 4436/23) provided only 264 visitor bike spaces for the entire masterplan representing only 43.5% of the corresponding DCC development management standard requirement. The proposal represents an increase above this accepted quantum with the new provision now equating to 53% of DCC requirements.

As set out in the DBFL Traffic & Transportation Report it is considered that this number is sufficient for the following reasons:

- A demand greater than 390 is very unlikely to be generated at the same time.
- The impact that the provision of the full requirement would have on the public realm in terms of permeability and useability of the spaces.
- The allowance for dual usage between residential and non-residential demands being generated at different times of the day and days of the week.
- The excellent public transport levels available at the site including LUAS, CBC arterial bus services, the additional Kylemore Road orbital bus routes in addition to the proposed DART+ services via the new Kylemore Rd railway

station; will make public transport the preferred sustainable travel choice for the vast majority of journeys were the travel distance greater than a convenient short walk is required.

- The proposed 390 visitor bike spaces represent a significant increase over the previously permitted 264 spaces in the earlier 2023 scheme proposal. Whilst the 2023 provision represented 44% of the DCC standard the subject 2026 masterplan proposals represent a larger proportion at 53% of the DCC standards.

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 MMP and the appointment of a Mobility Manager to promote sustainable travel patterns by residents noting an Outline MMP is submitted with the application.

6.6 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, noting that the height, scale and massing is as permitted, or reduced from what is permitted with only internal layouts being amended. A detailed Daylight, Sunlight & Overshadowing 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 greatly exceed the recommendations outlined within the Third Edition (BR 209) of BRE guide, 99.31% for Criterion 1 and 96.94% for Criterion 2 within the proposed development has been achieved.
  Throughout the development, comfortable and desirable spaces have been designed to enhance the opportunity for improved daylight levels and extensive glazing to every room enabling deep daylight penetration and providing enhanced views to landscaped open spaces.

- Sunlight: In relation to amenity space sunlight, the overall amenity space in the development shows compliance with BRE Guide 3rd Edition (BR 209) recommendations, with more than 50% of the total amenity space receiving more than 2 hours of sunlight on March 21st test day.

- Overshadowing: The change in the overshadowing is positive or negligible when compared to the originally permitted development, as the heights of all blocks have been reduced. Consequently, the proposed development results in a positive or negligible impact on surrounding properties and amenity spaces when assessed on the 21st March test day.

- Impact to neighbouring properties: The Vertical Sky Component (VSC) at all assessed windows within the surrounding existing and permitted properties has been analysed. The results indicate that the VSC values for the new proposed amended development remain at or above 100% of the corresponding values achieved under the originally permitted development. This improvement is attributable to the reduction in overall building heights across all blocks within the new proposed amended development. Therefore, the new proposed amended development is not expected to result in any adverse impact on the daylight conditions of the surrounding existing and permitted properties when compared to the originally permitted development.

Based on the above summary along with detailed material provided in the Daylight, Sunlight & Overshadowing Assessment 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.

6.7 CHILDCARE PROVISION

The proposed amendments include for the relocation of the permitted creche from the ground floor of D2 to the ground floor of Blocks B1-B2. The parent permission was permitted on the basis of a creche of a c.462sq.m with an outdoor play area. The relocated creche is increased in size to c. 600 sq.m with an external play area of 160 sq.m.

The proposed creche is provided on the basis of a requirement of c.172 spaces for a total of 618 units (total number of units less studios and one-bed units, as set out further below). The 618 units includes the 2-Bed & 3-Bed apartment units.

The proposed minor amendments to unit mix reduces the childcare requirements of the scheme while at the same time it is proposed to significantly increases the size of the creche to c.702 sq.m. As such it is considered that the minor increase in units compared to the originally permitted numbers plus the significant increase in the size of the creche more than provides for childcare places required for the development and will have a positive impact on childcare availability locally. The relocation an increase in size of the creche is considered to provide for a better location in terms of the external space and layout of the unit from an occupier's perspective and is considered to increase the capacity to accommodate the schemes requirements.

The location of the crèche has been considered in terms of compliance with Objective QHSNO19 from the DCC Development Plan which states:

Pre-School Facilities
To ensure that pre-school facilities are appropriately sited and protected from air pollution. Where an application is made within or proximate to locations experiencing high levels of pollution, the application must adequately address the impact through design and repositioning, and provide a suitable, attractive, protected outdoor environment before permission can be considered.

Both a noise impact and air quality assessment of the space has been undertaken by AWN Consulting. Both reports identify that the external space for the creche will not be subject to any impact on noise or air quality affecting its use by the children using the space.

7. PART V – SOCIAL HOUSING

The City Development Plan identifies as a policy:

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

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 Blocks D1 and D2 in the northern eastern section of the scheme.

It is proposed to develop a total of 1,198 no. homes at the site, noting this application is for amendments to a permitted development, which includes for 2 additional units only, and the Applicant proposes 123 no. Part V homes, for the overall scheme. The applicant is committed to providing the full requirement under their Part V obligations. The applicant has held preliminary discussion with DCC Housing who have provided a Part V Validation Letter to accompany the LRD Application.

8. ENVIRONMENTAL CONSIDERATIONS

8.1 BIRDS AND HABITATS DIRECTIVE – APPROPRIATE ASSESSMENT

An Appropriate Assessment Screening Report (AASR) accompanied the planning application for the permitted development. That AASR concluded that the development permitted would not have any likely significant effects on European sites under Article 6 of the Habitats Directive in light of their conservation objectives. This was also the conclusion of the planning authority and An Bord Pleanala.

The proposed amendments are very minor in nature and scale and, in view of best scientific knowledge it is reasonable to conclude that the proposed development (amendments to permitted development), individually or in combination with another plan or project, will not have a significant effect on any European sites. This is set out in an Appropriate Assessment Screening which accompanies the LRD Application.

8.2 EIA DIRECTIVE

An Environmental Impact Assessment Report (EIAR) was prepared to accompany the planning application for the permitted development, in order to assess the potential impact of the proposed development on the environment.

The proposed development consists of amendments to development previously permitted and primarily involves the internal amendment of permitted blocks with minor footprint amendments and reduced massing. There is a reduction in overall floor area and basement areas, within the same site area, but fundamentally the amendments are limited when compared to the permitted scheme, as assessed under the EIA.

Thus, the proposed amendments will result in a reduction (i.e. improvement) in any environmental impact relating to reduction of excavation / soil removal and generation of waste and to a reduction in construction of below ground development including reduction in greenhouse emissions.

An EIA Screening Report has been included as part of the LRD application. This considers It is considered that the proposed development, comprising only minor amendments to permitted development would not be likely to have significant effects on the environment. The main reasons for this conclusion are as follows:

- The nature of the proposed development, involving alterations to existing permitted residential development within the same development footprint;
- No demolition works are proposed;
- The proposed development is consistent with the on-going emerging nature the surrounding area;
- No unusual aspects are associated with the proposed development; and
- The proposed development will not give rise to any significant environmental effects.

Therefore, it is recommended that, having regard to the information set out above, the Competent Authority may reach a screening determination that *there is no real likelihood of significant effects arising as a result of the proposed development; and, therefore, that environmental impact assessment and the preparation of an environmental impact assessment report is not required.*

9. CONCLUSION

The statement and report set out herein demonstrates the consistency of the proposed amendments to the permitted development at the former Royal Liver Retail Park 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 amendments will provide for a scheme more aligned with LDA objectives, enabling the development of this significant residential development. 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 would welcome a grant of permission from Dublin City Council.

APPENDIX 1- ADJACENT RETAIL ASSESSMENT

INTRODUCTION

The ability of new residential development to access retail services is paramount in maintaining sustainable communities. The primary objective of this is to consider the retail context of the Royal Liver Site in respect of the proposed reduction of the primary retail supermarket unit, from the permitted scale to now proposed. The planning permission for the site was granted in 2019 and the wider retail context for the site has evolved since this time.

METHODOLOGY

As part of this Planning Application, an assessment of the existing range of retail facilities in the area has been carried out in order to assess the need for future Infrastructure. A desktop study was used to collect the baseline information. The facilities in each category were recorded in an Excel Table and then mapped using QGIS Mapping Services. This Study Primary uses both public and private geospatial datasets throughout this study, including but not limited to:

- 2026 Google Places Dataset;
- 2026 ESRI Ireland Basemaps;
- Feb 2026 GeoHIve Planning Application Sites for Ireland;
- DCC Planning Portal; and
- QGIS Desktop v. 3.40.14

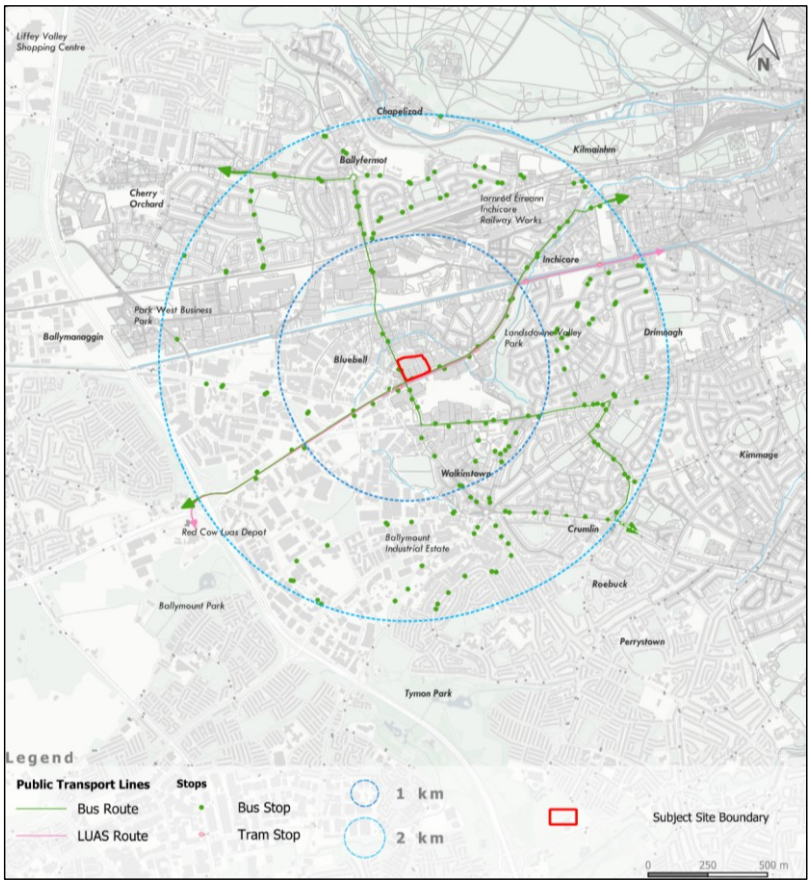


Figure 9-1 Site Location and Context within Retail Study

STUDY AREA AND CONTEXT

The study area for this assessment includes both a 1 and 2km radius of the subject site, which is considered accessible to future residents of the proposed. The 1km radius reflects a walking distance of c. 12-14 minutes and the 2km radius reflects has been included to consider retail facilities which are easily accessible by adjacent public transport that passes the Royal Liver site.

Table 9-1 Table of Retail Units within the Catchment Area, categorized based on type of shop and distance for Subject Site. (Source: Google Maps, QGIS Calculations, BSM Annotations 2026)

No.	Name	Facility Type	Address	Distance (c. Km)
1	Centra Bluebell	Convenience	La Touche Rd, Bluebell Ave, Inchicore, Dublin 12, D12 XD28	0.40
2	ALDI	Supermarket	Long Mile Road, D12 W838 Drimnagh	0.46
3	Lidl	Supermarket	12 Walkinstown Ave, Walkinstown, Dublin, D12 W954	0.60
4	ALDI	Supermarket	Kylemore Rd, Inchicore, Dublin, D10 DR58	0.77
5	SuperValu Walkinstown	Supermarket	Walkinstown, Dublin 12, D12 XDK2	0.96
6	Centra Drimnagh	Convenience	Unit C, 12 Drimnagh Rd, Walkinstown, Dublin, D12 DH76	1.14
7	Daybreak	Convenience	199 Tyrconnell Rd, Inchicore, Dublin, D08 R8KT	1.20
8	Asia Market	Specialty Store	Merrywell Business Park, Ballymount Rd Lower, Fox-And-Geese, Dublin 12, D12 W327	1.28
9	Tesco Superstore	Supermarket	Upper, Ballyfermot Rd, Kylemore, Dublin D10RX30	1.55
10	Tesco Express	Supermarket	38 - 41 Tyrconnell Rd, Inchicore, Dublin, D08 TXV4	1.66
11	Centra Walkinstown	Convenience	Cromwellsfort Rd, Walkinstown, Dublin 12, D12 DW72	1.72
12	Tesco Express	Supermarket	10-10a St Agnes Rd, Walkinstown, Dublin, D12 F516	1.77
13	Centra Ballyfermot Road	Convenience	355 Ballyfermot Rd, Cherry Orchard, Dublin 10, D10 EP90	1.80
14	Kari Stores	Specialty Store	205, Emmet Road, Inchicore, Dublin 8	1.80
15	Lidl	Supermarket	Greenhills Rd, Kilnamanagh, Dublin, D12 KW14	1.84
16	Spar Park West	Convenience	The Plaza, 71A Park W Ave., Park West Business Park, Dublin 12, 12	1.84
17	Dunnes Stores	Supermarket	Ashleaf Shopping Centre, Cromwellsfort Rd, Crumlin, Dublin, D12 RKK5	1.97
18	Centra	Convenience	15 Claddagh Green, Cherry Orchard, Dublin, D10 DT32	1.99

The above table indicates a significant number of retail facilities within close proximity to the site, which are accessible both by walking and sustainable transport measures.

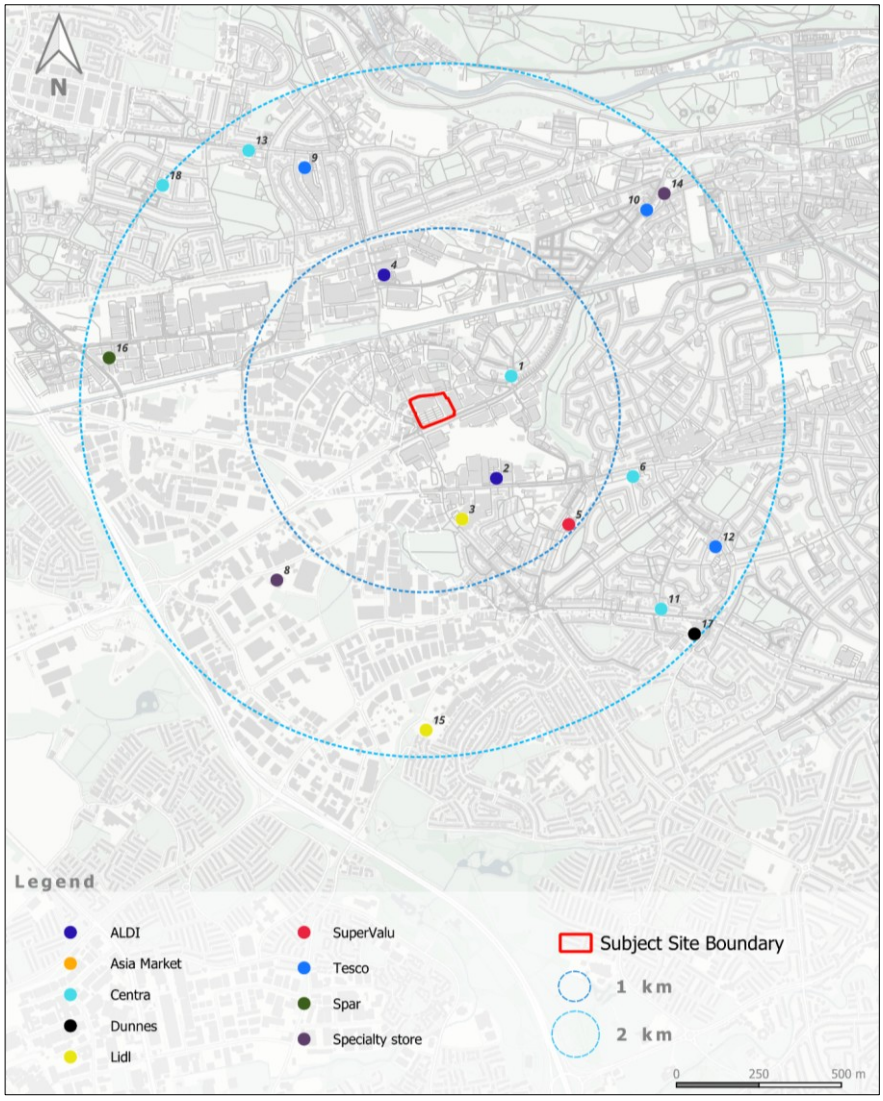


Figure 1-2 Map of Points of Retail within 2km of the catchment Site, defined by retailor. (Source: Google Maps, QGIS, BSM Annotations 2026)

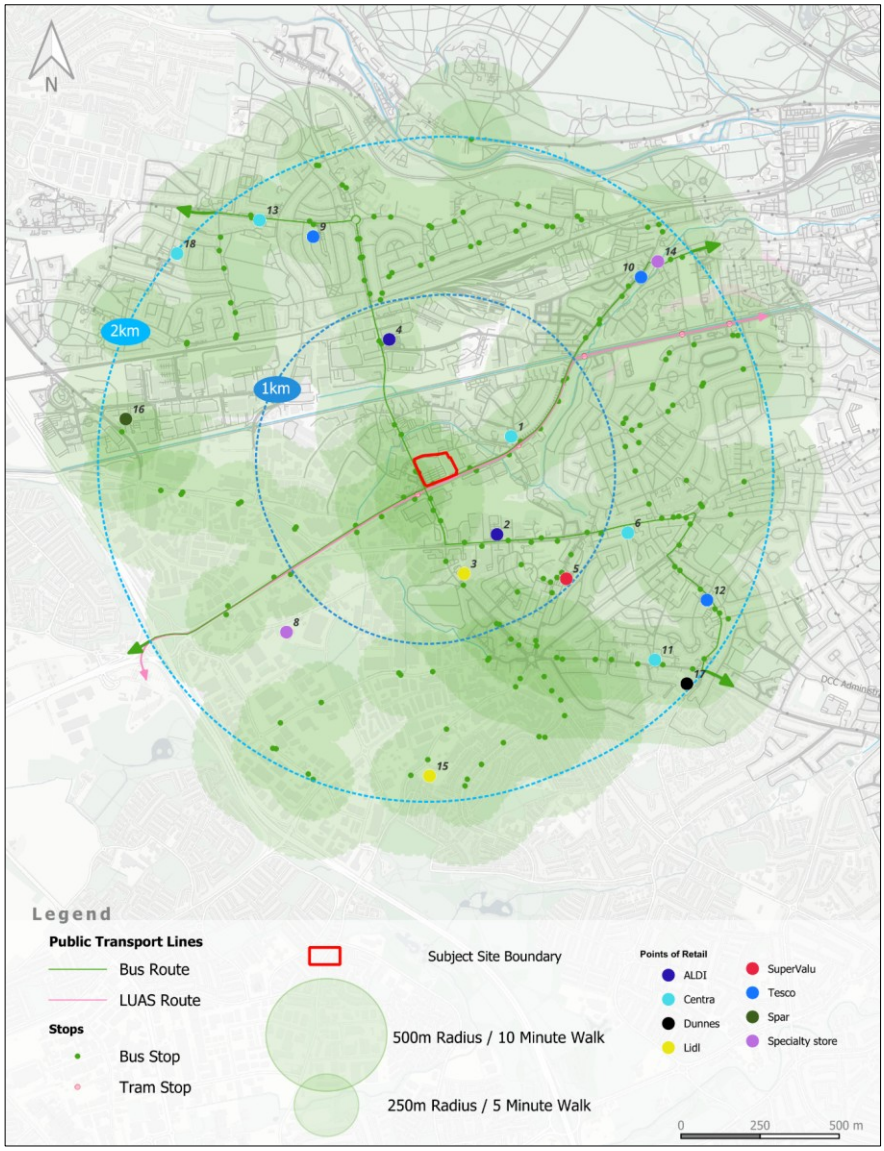


Figure 9-2 Map of Retail Points and Public Transportation with 250m and 500m radius buffers in relation to the 2km catchment radius around the Subject site. (Source: Google Earth, QGIS, BSM annotations 2026)

Figures 1-3 and 1-4 identifies retail facilities which are located within a 250m-500m disance from public transport stops (bus and luas) which pass the Royal Liver Site. This identifies that residents will have access to wider facilities located on a quick publc transport journey ensuring that residents are not reliant on private vehicles for access to retail supermarkets.

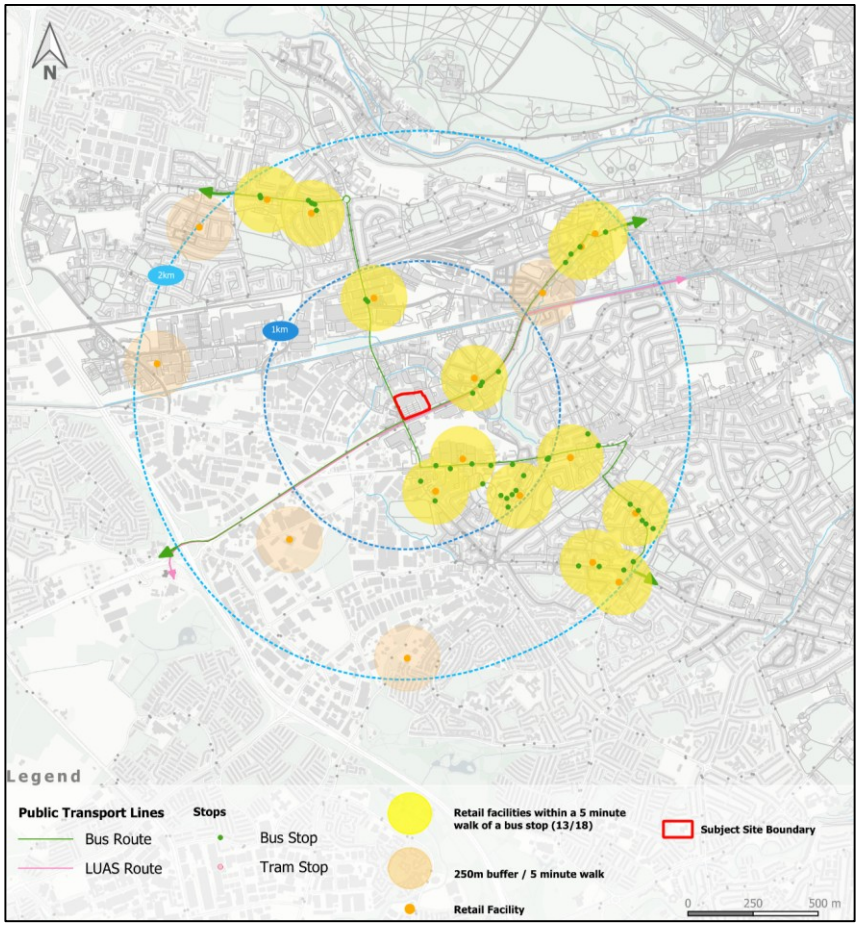


Figure 9-4 Map of Retail Points and Public Transportation with 250m buffer from public transportation stops. (Source: Google Earth, QGIS, BSM annotations 2026)

CONCLUSION

Since the permission for the Royal Liver site was granted a number of significant retail supermarkets have been permitted and developed. These include Aldi Long Mile Road (0.46km distance from the site), Lidl Walkinstown Avenue (0.60km distance from the site) and Aldi Kylemore Road (0.77km distance from the site).

The proposed amendments to Phase 2 are proposing that the large retail supermarket permitted is reduced from c.2360 sq.m to c.834 sq.m to reflect the considered demand for facilities on the site. It is considered in the context of the current retail context that this will not adversely affect residents access to retail facilities and will in fact provide for a significant offering on the site while also supporting adjacent retail facilities.