LRD Application

Planning Report & Statement of Consistency

For Amendments to Permitted Development at Former Players Wills Site, Dublin 8

Brady Shipman Martin

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Place Making **Built Environment**

Client

CWTC Multi Family ICAV acting solely in respect of its sub fund the DBTR SCR1 Fund

Date

October 2026

DOCUMENT CONTROL SHEET

Project No. 7217
Client: CWTC Multi Family ICAV acting solely in respect of its sub fund the DBTR SCR1 Fund
Project Name: Player Wills
Report Name: Planning Report
Document No. RPRL01
Issue No. 01
Date: October 2026

This document has been issued and amended as follows:

Issue	Status	Date	Prepared	Checked
01	Planning Report – LRD Application	23 Oct 2026	ST	PB

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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 CWTC Multi Family ICAV acting solely in respect of its sub fund the DBTR SCR1 Fund (the 'applicant').

The subject site has an area of approximately 1.43 ha and is located within the Former Player Wills Site with boundaries on South Circular Road, St. Catherine's Avenue and Donore Avenue, Dublin 8. The site is bound by lands in the ownership of DCC to the West, and further West by the Bailey Gibson Site (in the ownership of the applicant), to the northwest the DCC Donore Lands (currently under construction by the LDA), to the North the St. Teresa's Church on Donore Avenue and existing housing to the East.

The development will consist of amendments to a previously permitted development (ABP-308917-20; DCC Ref: SHD0031/20, as amended by DCC Ref.: 3406/25. The proposed amendments relate only to the permitted Block PW1, which includes the former Player Wills Factory (a Protected Structure, RPS Ref: 8796), Block PW2 and Block PW5 only.

The site, since receiving permission for redevelopment, including an extensive Judicial Review Process, is now being commenced for construction and some minor amendments are sought to enhance the schemes delivery.

The application is being progressed through the LRD process as the parent permission was granted under the Strategic Housing Development process.

A pre-planning consultation meeting, as provided for under Section 247 of the Act, was held with Dublin City Council on 27th May 2026. (LRD9020/26-S1).

Subsequently a Determination was issued by Dublin City Council under Section 247 (7) that no further consultation was required. As such the proposed amendments are now proceeding straight to LRD Application.

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

The proposed development consists of amendments to the development at the former 'Player Wills' site, South Circular Road, St. Catherine's Avenue and Donore Avenue, Dublin 8, as permitted under ABP-308917-20 (DCC Ref: SHD0031/20) and as amended under DCC Reg. Ref.: 3406/25. The proposed amendments relate only to the permitted Block PW1, which includes the former Player Wills Factory (a Protected Structure, RPS Ref: 8796), Block PW2 and Block PW5 only.

The proposed amendments include for alteration of the permitted ground floor layouts of PW1 and PW2 including the relocation of permitted amenity spaces and retail/restaurant spaces, some minor amendments to unit mix and layouts, and amenity spaces at upper levels. It also includes for the reconfiguration of the permitted Block PW5.

The proposed amendments result in no increase in the overall permitted 492 residential units and 240 shared living units but alters the permitted unit mix across the scheme to consist of 26 No. Studios, 303 No. 1-Bed, 111 No. 2-Bed-4-Person and 52 No. 3-Bed- 5-Person. The proposed amendments are set out as follows:

1. *Amendments to permitted Block PW1 (which includes the former Player Wills Factory (a Protected Structure, RPS Ref: 8796)) to include:*
   - *Reduction of permitted ground floor commercial uses and a subsequent increase in tenant amenity space at ground floor level. This results in a ground floor containing 2 no. retail/bar/restaurant units of 533 sq.m and 531 sq.m, tenant amenity space to include a gym, management offices and reception of c. 906 sq.m, community unit (478 sq.m as permitted) and cultural unit (312 sq.m as permitted). Subsequent elevational changes to the western façade to provide for revised access to amendment layout.*
   - *Removal of permitted tenant amenity lounge at Level 8, and subsequent increase in external amenity terrace at Level 8 from c. 285 sq.m to 313 sq.m.*
   - *Relocation of permitted sub-station from internally within the ground floor of PW1 to the permitted standalone plant/bin store area at the northwest corner of PW1.*
   - *Minor increase in the permitted basement below PW1 of c.41 sq.m, containing plant areas only.*
   - *Alteration of permitted plant areas at roof level of PW1 and the addition of PV panels.*
2. *Amendments to permitted PW2 to include:*
   - *Alteration of permitted substation and provision of an additional substation in place of a permitted residential unit at ground level and alterations to permitted cores and basement access. Addition of 1 additional residential unit at ground level.*
   - *Reconfiguration of permitted retail unit, to c. 77.6 sq.m, located at ground level on the north-east corner to accommodate a relocated entrance lobby.*
   - *Alteration of permitted retail unit to c.71.3 sq.m and cafe unit to c. 94.5 sq.m on the southwest corner of the block to accommodate amended access and alteration of 2 no. permitted bicycle lifts at ground level to dedicated bicycle stairs with automated ramps to basement level.*
   - *At levels 1, 3 and 5 the conversion of a 2-no. permitted 1- bed units to 2-bed units and on level 2, 1 no. permitted 1- bed unit to 2-bed unit, as a result of the additional stair core.*
   - *At level 15 & 16, the reconfiguration of 4 no. 2-bed units to 4 no. 1-bed units to facilitate an additional stair core and reconfiguration of 1 no. 1-bed duplex unit to 2 no. 1 bed units.*
   - *At level 17 the reconfiguration of 1 no. 2-bed unit to 1 no. 1-bed unit to facilitate an additional stair core.*
   - *Removal of plant screen at Level 8.*
   - *The proposed amendments result in an increase in permitted units within PW2 from 415 to 416 and a minor alteration of the permitted unit mix as set out above.*
3. *Amendments to permitted PW5 to include:*
   - *Reconfiguration of permitted block containing 21 no. residential units to a block containing 20 no. units of 15 no. 1-bed, 2 no. 2-bed – 4 Person and 3 no. 3-bed- 5-Person units. The footprint remains largely consistent with the permitted block, with no increase in overall heights.*
   - *The revised block is provided around the permitted communal amenity space located to the east of the block.*
4. *All associated works to accommodate the proposed changes, including minor alterations to landscaping, waste management, 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

2.1 SITE LOCATION

The subject site has an area of approximately 1.43 ha and is located within the Former Player Wills Site with boundaries on South Circular Road, St. Catherine's Avenue and Donore Avenue, Dublin 8. The site is bound by lands in the ownership of DCC to the West, and further West by the Bailey Gibson Site (in the ownership of the applicant), to the northwest the DCC Donore Lands (currently under construction by the LDA), to the North the St. Teresa's Church on Donore Avene and existing housing to the West.

The site is highly accessible by sustainable transport such as high frequency bus services on Donore Avenue, South Circular Road and Cork Street, with the Fatima Luas stop within walking distance. It forms the next phase of regeneration within SDRA 11, continuing the established framework of the adjoining permitted Player Wills scheme.

2.2 SITE CONTEXT

The site is currently occupied by the former Player Wills Factory Building and associated warehousing/buildings. The permitted development allows for the demolition of the majority of buildings on the site, this work has commenced.

The site lies within Strategic Development and Regeneration Area 11 (St. Teresa's Gardens and Environs) designated in the Dublin City Development Plan 2022– 2028. SDRA 11 covers approximately 13 hectares of regeneration land in the inner south-west city, including the former Player Wills and Bailey Gibson sites, the St. Teresa's Gardens estate, and lands in Dublin City Council ownership.

It has an estimated residential capacity of 1,500 units and is identified as a key driver of sustainable urban growth, supported by BusConnects infrastructure on Cork Street and Donore Avenue. The guiding principles establish a mixed-tenure residential quarter of high architectural quality, structured around a legible network of streets and public spaces ensuring physical and social integration.

3. PLANNING HISTORY

There have been a number of previous applications on the site related to its redevelopment. Since the granting of previous permissions, the site has been acquired by the applicant who are now seeking minor amendments to optimise the delivery of the site.

3.1 SUBJECT SITE

ACP Reg. Ref: 308917-20 Former Player Wills Site

Planning Permission was granted by An Coimisiún Pleanala (ACP) on 15th April 2021, under the Strategic Housing Development process. Permission was granted for 4 no. buildings, identified as PW1, PW2, PW4 and PW5 to contain, in summary:

Parameter	Site Proposal
Application Site Area	3.06 Hectares (Application Boundary)
No. of Units	732 units (492 BTR units in and 240 Single occupancy shared accommodation units in PW1 only)

Density	239 units per hectare
Non-residential Uses	PW1: 852 sqm community uses503 sqm retail space994 sqm café/bar/restaurant floor space217 sqm co-working space PW2: Co-working facility and retail units. Two ground floor retail units (88 sqm and 110 sqm)Café/restaurant (142 sqm)Co-working space (221 sqm) PW4: 275 sqm Crèche
Residential Amenity Uses	PW1: 1,588 sqm of shared amenity/facilities PW2: 673 sqm of shared amenity/facilities
Public Open Space	'Players Park' (3,960 sq.m) 'St. Catherine's Park' (1,350 sq.m) a playground, adjacent to St. Catherine's National School. A temporary park (1,158 sq.m) on a site set aside for a future school extension The existing courtyard (690 sq.m) in block PW1 (former factory building) to become a public plaza (320 sq.m).
Height	4-8 storeys in PW1 (240 shared living units and 47 BTR units)2-19 storeys in PW2 (BTR block; 415 units)2-3 storeys in PW4 (9 BTR units and crèche)4 storeys in PW5 (21 units)
Car Parking	280
Bicycle Parking	1,013
Vehicular Access	From Donore Avenue and South Circular Road

The development was permitted by Coimisiún Pleanala and subsequently subject to a Judicial Review taken by third parties. A number of matters arising from the proceedings were referred to Court of Justice of the European Union (CJEU) before coming back to the High Court for determination. The Judicial Review proceedings commenced in August 2021 and concluded in November 2023

Amendment Application (Reg. Ref.: 3406/25)

The full development description, as per public notices, is as follows:

The proposed development consists of amendments to the permitted basement under Block PW2 only, as permitted under ABP-308917-20 (DCC Ref: SHD0031/20). The proposed amendments include:

- *Omission of permitted basement -2 level and consolidation of parking, cycle parking, plant and servicing areas into an enlarged basement -1 level. This consolidation includes for removal of previously permitted 81 no. car parking spaces identified for adjacent future development lands (and permitted as storage) and 10. no car parking spaces for the permitted development.*
- *This results in a single basement -1 level of c.7,234 sq.m which will include 880 no. cycle parking spaces, 148 no. car parking spaces (138 resident spaces including 13 accessible spaces, and 10 car-club spaces), plant areas, waste stores, access cores to apartments above, residents' storage areas and e-scooter parking.*

The proposed amendments relate to the permitted basement under Block PW2 only and no amendments are proposed to any permitted above ground elements of Block PW2 or elements of the wider permitted scheme including Block PW1 which relates to the former Player Wills Factory (a Protected Structure, RPS Ref: 8796).

The proposed amendments to the permitted scheme represent minor alterations to the scheme relating solely to the permitted basement area and is proposed to achieve a greater efficiency of design.

3.2 ADJACENT SITES

DCC Reg. Ref: 5180/26 – Site of c. 3.1860 ha. at the former St. Teresa's Gardens social housing complex located on Donore Avenue, Dublin 8

This application is adjacent to the LDA's Donore Project which is presently under construction (permitted under ACP Reg. Ref. 315306-22 as altered by ACP Reg. Ref. 321106-24). The application is currently live, awaiting approval by DCC and is set out below as per the public notices:

Pursuant to the requirements above, Notice is hereby given of the proposal to construct the proposed development including the Municipal Playing Pitch, Players Park and two residential blocks comprising 123 No. units at DCC2 and DCC4 (also known as Sites 1 and 2 respectively), Former St. Teresa's Gardens, Donore Avenue, Dublin 8, which will consist of the following:

- *DCC2 comprises 103 No. Units in a part 15 / 16 storey apartment block including a 1 storey element with a roof terrace above. Units proposed include: 1 No. studios, 71 No. 1 bed units and 31 No. 2 bedroom apartments. 311sqm Communal open space is provided at first and fifteenth floor level. 5 no. parallel car parking spaces immediately south of proposed DCC2 and 9 No. additional spaces allocated to DCC2 to the west of the pitch;*
- *DCC4 comprises 20 No. Units in a single 3-storey block of comprising ground-floor apartments with duplex units above. The block includes a mix of 2 No. 1 bed units, 8 No. 2-bedroom and 10 No. 3-bedroom duplexes, each with own door access. 16 No. parallel car parking spaces immediately north of proposed units;*
- *The proposal comprises the provision of a municipal sports pitch (88m x 138m in size) with adjacent landscaped areas, fitness equipment and play spaces to the north west;*
- *Public open space is also provided in form of a park referred to in the SDRA 11 St Teresa's Gardens and Environs as 'Players Park' which is 3,676.8 sqm in size;*
- *182 No. bicycle parking spaces which are located within secure bicycle stores. In addition, 62 No. spaces for visitors are distributed throughout the site;*
- *A total of 62 car parking space are provided to serve the development including 3 set-down and loading bays are proposed consisting of: 1 No. bus set-down; 1 No. loading bay to Donore Avenue; 1 No. set-down bay to the west of the pitch; 4 no. motorbike spaces are provided, 3 No. to serve DCC2 and 1 No. to serve DCC4*
- *Boundary treatments, planting, play spaces, fitness equipment, communal open space, public lighting, sports pitch flood lighting and telecommunications infrastructure, site drainage works, blue roofs, PV panels, internal road surfacing and footpaths, ESB meter rooms, ESB substations, utility and services connections, bin and cycle storage, plant rooms, and landscaping; and*
- *All associated development.*

ACP Reg. Ref: 315306-22 Donore Project – The former St. Teresa's Gardens, Donore Avenue, Dublin 8.
The wider Donore Project was permitted by ACP for the following development proposed by the Land Development Agency on 28th June 2023 for:

The development (GFA of c. 53,227 sqm) contains the following mix of apartments: 225 No. 1 bedroom apartments (36 no. 1-person & 189 no. 2-person), 274 No. 2 bedroom apartments (including 52 No. 2 bed 3 person apartments and 222 No. 2 bed 4 person apartments), 44 No. 3 bedroom 5-person apartments, together with retail/café unit (168 sq.m.), mobility hub (52 sq.m.) and 952 sq.m. of community, artist workspace, arts and cultural space, including a creche, set out in 4 No. blocks.

ACP Reg. Ref: 321106-24 Alterations to previously approved applications ACP 315306-22 for residential development at former St. Teresa's Gardens.

The LDA sought to alter the terms of a planning permission (ABP Reg. Ref. ABP-315306-22) for an application permitted under Section 175 of the Planning and Development Act, 2000 (as amended) at lands on the former St. Teresa's Gardens, Donore Avenue, Dublin 8. ACP approved the alterations in February 2025.

ACP Reg. Ref: 307221 Former Bailey Gibson Site – and extension of duration
An Coimisiún Pleanála granted planning permission on the 14th September 2020 for a Build to Rent Strategic Housing Development at the former 'Bailey Gibson' site, 326-328 South Circular Road, Dublin 8.

The application area of c.2.18 hectares, includes the Bailey Gibson site (1.53 hectares) and 0.646 hectares to accommodate works to facilitate connections to municipal services and works proposed to public roads. The development consists of:

- the demolition of all buildings and structures on the site, including 9 no. buildings (11,234.42 sq.m GFA) and 1 no. ESB substation (21sq.m) to make way for development of the site;
- the construction of 416 no. residential units in 5 no. blocks, with a cumulative gross floor area of 31,117 sq.m for the residential component comprising 404 no. apartments in 4 no. blocks (BG1-4), 2 no. 2-storey 2-bedroom duplex apartments in BG3, in 6 no. 3-storey 3-bedroom triplex apartments in BG1; 4 no. 3-storey 4-bedroom townhouses in BG5;
- the construction of tenant amenities, provision of communal open space distributed
- the construction of a childcare facility
- the construction of commercial floorspace to facilitate a restaurant/café/bar/retail/services

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 27th May 2026, with attendees from Planning Department of Dublin City Council.

Subsequently DCC determined that further consultation was not required and the application could proceed directly to LRD Application.

5. STATEMENT OF CONSISTENCY

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

5.1 NATIONAL AND REGIONAL POLICY

A selection of 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

- 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)

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. 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 site has a permitted consent for significant residential accommodation and has commenced on site. The proposed amendments will optimise the scheme providing for an enhanced scheme and ensuring the delivery of much needed accommodation in key areas in line with the Housing Plan.

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.

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"* as a top priority.

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 permitted development, including this proposed amendment is considered consistent with the National Policy Objectives of the NPF First Revision.

5.1.3 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 site is located with 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.

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 which includes the subject site.

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 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.

The site is well served by public transport and is highly accessible by walking and cycling to the City Centre. It is an identified regeneration area and will enable the delivery of complementary development and services to the LDA St. Teresas Gardens scheme.

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

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

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

Density

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

Table 3.1 of the Guidelines sets out the area and density ranges applicable to Dublin and Cork City and Suburbs. The site on the South Circular Road is considered 'City – Centre as follows:

City - Centre
The city centres of Dublin and Cork, comprising the city core and immediately surrounding neighbourhoods6, are the most central and accessible urban locations nationally with the greatest intensity of land uses, including higher order employment, recreation, cultural, education, commercial and retail uses. It is a policy and objective of these Guidelines that residential densities in the range 100 dph to 300 dph (net) shall generally be applied in the centres of Dublin and Cork

The footnote related to this classification states that *'For example, the Dublin City Development Plan 2022-2028 refers to the inner city and its immediately surrounding neighbourhoods within the canals';*

The subject site is located within the Canals and is an identified Strategic Development & Regeneration Area. In this respect, a permitted level density of has already been achieved which exceeds the density parameters 100 dph to 300 dph set out above which is not changed by the proposed amendments.

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

5.1.5 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 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.

5.1.6 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 19 storeys, the proposed amendments, the subject of this application, do not include any proposed increase to building heights.

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.

The proposed amendments will provide for improvements to the permitted 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 within the canals. 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 700 new homes. The amendments the subject of this application seek to alter the scheme to facilitate the delivery of the scheme in line with fires safety standards and also greater levels of residential amenity.

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.

5.2.4 STRATEGIC DEVELOPMENT & REGENERATION AREA (SDRA 11)

Section 13.13 of the Development Plan sets out the objectives for the St. Teresa's Gardens and Environs SDRA. It notes that St. Teresa's Gardens is a local authority housing estate that was built in the early 1950s, which has been the subject of plans for demolition and regeneration over a number of years. Alongside the estate are the former Player Wills/Bailey Gibson sites and St. Teresa's Church site (c.4.6 ha) and the Coombe Hospital site (2.32 ha), creating a potential 13-hectare redevelopment area.

The combined sites offer an opportunity to create a new mixed-use urban quarter, providing high-quality housing, improved streets and public spaces, and better integration with surrounding neighbourhoods.

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. The proposed amendments will facilitate the delivery of this significant site ensuring the next step in the overall implementation of the SDRA.

6. PROPOSED DEVELOPMENT

6.1 OVERALL DESIGN RATIONALE & AMENDMENTS

The proposed amendments to the permitted development, relating primarily to internal amendments to PW1 & PW2 and the reconfiguration of the permitted PW5, are consistent with the previously permitted development on the site. The proposed amendments are largely invisible to the permitted scheme. The permitted development for the wider scheme was permitted consistent with the Development Plan 2016-2022 objectives with specific reference to the requirements of SDRA 12- St Teresa's Gardens under the previous plan. The proposed development makes no amendments to the key principles of the permitted development, and as such is consistent with the now SDRA 11- St Teresa's Gardens.

The key amendments are set out below.

6.1.1 ALTERATIONS TO PERMITTED PW1

The primary change proposed to PW1 is the increase in tenant amenity proposed at ground floor, which reduces the extent of commercial space proposed and increases the extent of tenant amenity. The commercial space contained within the western side of the permitted PW1 included for a large multipurpose space which included café/co-working/bar&restaurant and a large retail unit. The scale of the space meant it would likely be challenging to find a single operator and sub-division of the space would be required.

The proposed amendments to the ground floor of PW1 seeks to consolidate the commercial uses into 2 no. standalone retail/café/bar/restaurant units of appropriate scale which will both enable commercial occupation and also provide public animation along the South Circular Road frontage. The western elevation continues to be occupied by permitted cultural and community spaces as per the permitted scheme.

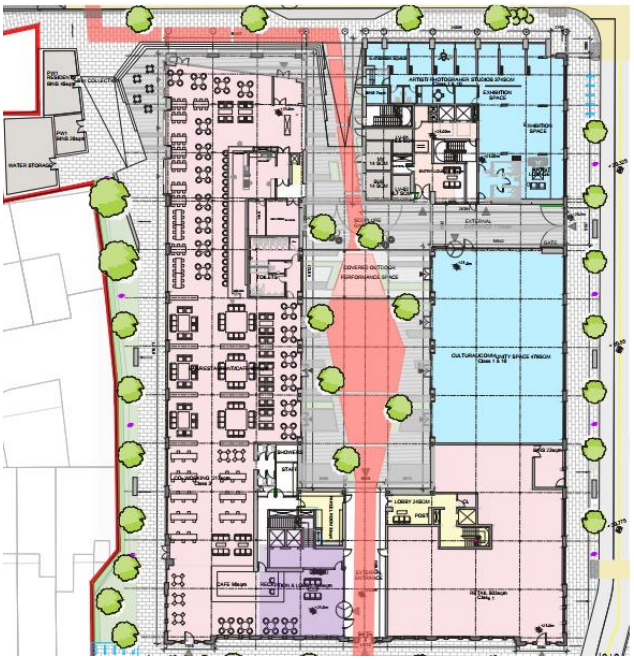


Figure 6-1: PW 1 Permitted Ground Floor Uses &



PW1 Proposed Ground Floor Uses (Source: HJL)

The proposed amendments contiue to ensure that there are active frontages on all facades of this important building and ensure a greater level of animation and use in the evenings and weekends through the bringing of a key tenant amenity like the gym to ground level. The existing tenant amenity space at upper levels is maintained with a reprogramming as a result of relocation of tenant gym.

Subsequent amendments are proposed to the façade of the western elevation to accommodate revised access into the amended ground floor layout. These are contained within the permitted openings and have no greater impact on the protected structure.

At Level 8, the internal amenity space provided of 43 sq.m is removed and the external roof terrace area is increased from 285 sq.m to 313 sq.m.

Other minor alterations relating to plant and services are proposed as part of the application which include:

- Relocation of permitted sub-station from internally within the ground floor of PW1 to the permitted standalone plant/bin store area at the north west corner of PW1.
- Minor increase in the permitted basement below PW1 of c.41 sq.m, containing plant areas only.
- Alteration of permitted plant areas at roof level of PW1 and the addition of PV panels.

Noting that PW1 is a Protected Structure, a Conservation Impact Assessment has been carried out by Slattery & Associates. This concludes that the proposals are minor in nature and will have minimal impact on character and no new impact at all physically on any historic fabric as they are mainly confined to interiors of blocks adjacent to the Protected Structure. As such, these changes would have to be considered very minor and in accordance with both Dublin City Development Plan Policy on Conservation and the relevant Guidance issued by the DoHLGH.

6.1.2 ALTERATION OF PW2 GROUND FLOOR LAYOUTS & UPPER-LEVEL UNITS

As set out in the Architect's Design Statement the primary changes to PW2 have been driven by the requirement for the provision of a second stair to each of the two towers, in accordance with updated fire safety requirements, as set out in the accompanying note by MSA.

This results in the following proposed amendments:

Middle & Upper Levels:

The requirement for changes at Levels 15 to 18 and requires reconfiguration of the apartment layouts at these levels which includes for:

- At level 15 & 16, the reconfiguration of 4 no. 2-bed units to 4 no. 1-bed units to and reconfiguration of 1 no. 1-bed duplex unit to 2 no. 1 bed units.
- At level 17 the reconfiguration of 1 no. 2-bed unit to 1 no. 1-bed unit
- Layout and mix refinements take place at levels 1, 2 3 & 5, within an unchanged unit count at each level. On levels 1,3 & 5 the 2 no. permitted 1- bed units change to 2-bed units and on level 2, 1 no. permitted 1-bed unit to 2-bed unit.

Reconfiguration of the upper levels resulting in a net increase of 1 no. residential unit within PW2, from 415 to 416. This additional unit is offset by the reduction of 1 unit within PW5, which results in no net increase in overall units permitted.

Ground Level

At ground level the proposed amendments are set out:

- Alteration of permitted substation and provision of an additional substation in place of a permitted residential unit at ground level and alterations to permitted cores and basement access. Addition of 1 additional residential unit at ground level which off sets the removed unit for a substation.
- Reconfiguration of permitted retail unit, from c. 110 sq.m to c. 77.6 sq.m, located at ground level on the north-east corner to accommodate a relocated entrance lobby.
- Alteration of permitted retail unit from c. 88 sq.m to c.71.3 sq.m and cafe unit from c.142 sq.m to c. 94.5 sq.m on the southwest corner of the block to accommodate amended access to the block and alteration of 2 no. permitted bicycle lifts at ground level to dedicated bicycle stairs with automated ramps to basement level.

The permitted and proposed unit mix as a result of the proposed amendments is below:

PW2	Permitted	Proposed	Change
Studio	16	14	**-2**
1-Bed	268	265	**-3**
2-Bed	93	99	**6**
3-Bed	38	38	**0**
Total	**415**	**416**	**1**

While there is a minor decrease in overall retail/café provision in PW2 it is considered that the proposed uses remain at key locations to ensure a level of animation throughout the scheme.

Tenant amenity provision within PW2 is marginally reduced from the permitted scheme, co-working is reduced from c. 223.9 to c. 200.7sqm and amenity from c. 158.5 to c. 149.7 sqm however tenant amenity space within PW1, which is accessible to the entire scheme, is increased under the proposed amendments. It is considered that future changes may be pursued in the future to further consolidate the amenity into PW1 as the central focus of the scheme.





Figure 6-2: PW 2 Permitted Ground Floor Uses &

PW2 Proposed Ground Floor Uses (Source: OMP)

6.1.3 ALTERATION OF BLOCK PW5

As set out in the Architect's Design Statement the proposed amendments to Block PW5 arise from a comprehensive design review of the permitted scheme in response to the following objectives:

- adaptation of the building design to a precast concrete construction methodology;
- improvement of the dwelling mix, with the omission of studio accommodation in favour of 1-bed and family-sized units;
- improvement of residential amenity, including a significant increase in dual aspect provision.

The permitted 21-unit block is reconfigured to provide 20 no. units, a reduction of 1 no. unit. The building height, footprint, floor area and communal open space are retained substantially as permitted. The access strategy is retained as permitted. The permitted and proposed unit mix for PW5 is below:

PW5	Permitted	Proposed	Change
Studio	12	0	**-12**
1-Bed	1	15	**14**

2-Bed	5	2	**-3**
3-Bed	3	3	**0**
Total	**21**	**20**	**-1**

The proposed amendment block is largely within the permitted footprint and retains the same overall heights and massing, with a minor reduction in overall height and the introduction of a greater setback at first floor level from the adjacent house on St. Catherine's Avenue. This ensures no change to the permitted impact on any adjacent neighbouring properties, as evident in Fig 6-3 and Fig 6-4 below:



Fig 6-3: Permitted & Proposed footprint of PW5

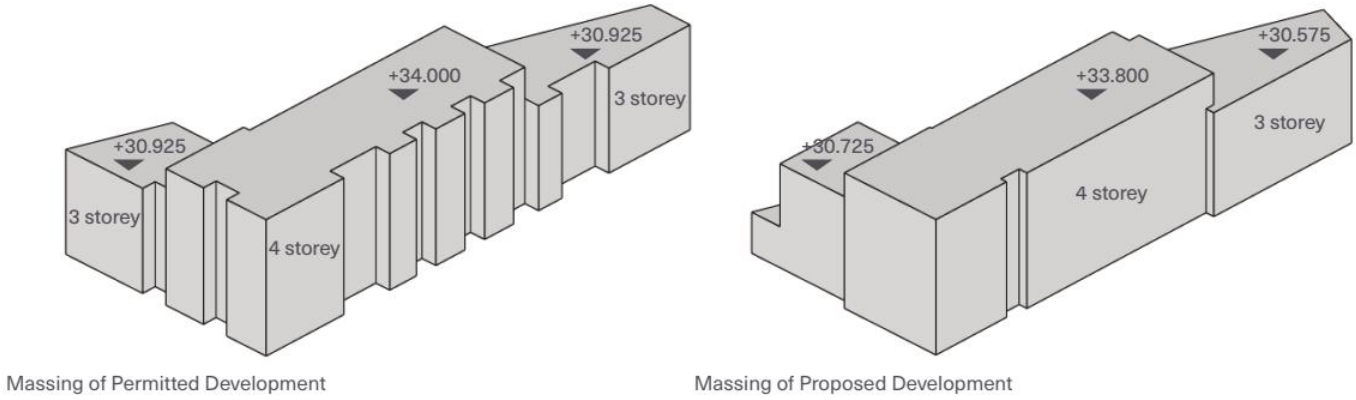


Fig 6-4: Permitted & Proposed heights and massing of PW5

The dual aspect ratio for PW5 has improved as a result of the proposed amendments from 33.3% to 45%.

Façade materiality is unchanged, with buff brick predominant. Façade articulation has been refined to reflect the precast concrete construction system

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 amended units have 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 all amended or new units proposed in this amendment application. The parent permission was lodged on the basis of compliance with the Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments that were issued in March 2018 ["the 2018 Guidelines"] and were assessed by ACP on the basis of compliance with those Guidelines as the application was lodged prior to updating of the Guidelines in December 2020.

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, noting it was permitted under the 2018 Apartment Guidelines, is as follows:

PERMITTED (OVERALL)

	PW1	PW2	PW4	PW5	Overall	%
Studio	12	16	0	12	**40**	**8.13**
1-Bed	23	268	0	1	**292**	**59.35**
2-Bed	8	93	2	5	**108**	**21.95**
3-Bed	4	38	7	3	**52**	**10.57**
Total BTR	**47**	**415**	**9**	**21**	**492**	**100.00**
Shared Accommodation	240	0	0	0	**240**	
Total	**287**	**415**	**9**	**21**	**732**	

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

PROPOSED (OVERALL)

	PW1	PW2	PW4	PW5	Overall	%
Studio	12	14	0	0	**26**	**5.28**
1-Bed	23	265	0	15	**303**	**61.59**
2-Bed	8	99	2	2	**111**	**22.56**
3-Bed	4	38	7	3	**52**	**10.57**
Total BTR	**47**	**416**	**9**	**20**	**492**	**100.00**
Shared Accommodation	240	0	0	0	**240**	
Total	**287**	**416**	**9**	**20**	**732**	

When considered in respect of PW1, PW2 & PW5 only, as the subject of this application the permitted and propose, as relating to apartment units only, is as below:

PERMITTED (PW1, 2 & 5 ONLY)

	PW1	PW2	PW5	Overall	%
Studio	12	16	12	**40**	**8.3**
1-Bed	23	268	1	**292**	**60.5**
2-Bed	8	93	5	**106**	**21.9**
3-Bed	4	38	3	**45**	**9.3**
Total	**47**	**415**	**21**	**483**	**100.00**

PROPOSED (PW1, 2 & 5 ONLY)

	PW1	PW2	PW5	Overall	%
Studio	12	14	0	**26**	**5.4**
1-Bed	23	265	15	**303**	**62.7**

2-Bed	8	99	2	**109**	**22.6**
3-Bed	4	38	3	**45**	**9.3**
Total	**47**	**416**	**20**	**483**	**100.00**

SPPR1 does not identify any restrictions on unit mix, as was the case for the permitted development as Build To Rent under the 2018 Guidelines, 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 does not identify a specific mix requirement for this site as it is not located within an identified HNDA area. 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 new and amended residential units, meet or exceed the minimum standards for apartment sizes under SPPR 2. This is set out in the HQA (Housing Quality Assessment) prepared by O'Mahony Pike.

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 requirement for the majority of all apartments to exceed the minimum floor area by a minimum of 10% does did not apply to BTR under the 2018 Guidelines. However within the permitted scheme the majority of units did exceed the minimum floor area as do the proposed new and amended units under this permission.

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 permitted development was granted on the basis of requiring a minimum of 33% dual aspect under the 2018 Guidelines, and included for 51% overall dual aspect. The proposed amendments increase the dual aspect ratio of PW5 from 33.3% to 45% thereby increasing the overall scheme percentage, which is well in excess of the current 2025 Guidelines 25% requirement.
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.

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 remain consistent with the permitted development and no core serves more than 12 units.

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 above the proposed amendments remain consistent with the permitted development and no core serves more than 12 units.

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 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 new or amended 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 new or amended units, and in all cases meets or exceed the minimum standards for private open space as per the 2025 Guidelines.

Section 15.9.7 of the Development Plan states the following:

Section 15.9.7
Private amenity space shall be provided in the form of terrace, balcony or private garden and should be located off the main living area in the apartment. The minimum areas for private amenity are set out in Appendix 1 and Section 3.35 to 3.39 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.
At ground floor level, private amenity space should be sufficiently screened to provide for privacy. Where ground floor apartments are to be located adjoining the back of a public footpath or other public area, consideration may be given to the provision of a 'privacy strip' of approximately 1.5 m in depth, subject to appropriate landscape design and boundary treatment.

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

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.

There is no change to proposed communal amenity space other than an increase in external space provided at Level 8 of PW1 where the removal of an internal amenity space has increased external space. The alterations of permitted unit mix are so minor that there is no additional requirement above what has been permitted to date.

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

There is no amendment to permitted public open space which is provided as part of the permitted development and is in line with the specific requirements of the SDRA. The SDRA requires that 20% of the lands are identified for public open space. The Player Wills application area was 3.06 hectares, which represented 26.3% of the SDRA 12 lands. Proportionally, to achieve the SDRA requirement, this required 0.54 hectares of public open space.

The permitted development includes a cumulative total of 0.63 hectares public open space;

- 'Players Park' (3,960 sq.m)
- 'St. Catherine's Park' (1,350 sq.m)
- PW 1 courtyard (690 sq.m) in block PW1
- Public plaza (320 sq.m) between proposed blocks PW5 and PW4.

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 2.19 and there is no change to this as a result of the proposed amendments.

The Development Plan sets an indicative site coverage standard of 50-60% for 'Regeneration Area'. The permitted scheme has a site coverage of 31% and there is no change to this as a result of the proposed amendments. The site coverage as permitted is below the Development Plan requirement but that is due to the extent of new connections and public open space provided.

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 scheme as permitted, and as identified in the SDRA Objectives, includes for a landmark/tall building. The proposed amendments do not alter any of the permitted heights proposed and as such there is no consideration of heights required.

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 '*City Centre'* a density range of 100 dph to 300 dph (net) (dwellings per hectare).

The permitted development has a density of 239 units per hectare when based upon the entire site or 321 units per hectare when excluding DCC lands and the temporary park for the school.

Similar to height there is no increase in unit numbers and as such there is no change to permitted density levels.

6.5 ACCESS, CAR & CYCLE PARKING

As set out in the Transport Note prepared by Systra the proposed amendments will only have minor implications in terms of transport. As the number of units is identical to that consented, travel demand will not change, and the site access strategy remains unchanged. Car, motorcycle and bike parking will remain as consented.

The only substantive changes relate to:

- The switching of the bin stores and ESB substation at PW1, both of which can be accessed as required by emergency, refuse and service vehicles.
- The proposed replacement of two cycle lifts with a VeloComfort' ramp system will provide greater efficiency in terms of reduced waiting time, reduced space requirements and easier maintenance.

During the recent amendment application (Ref: 3406/25) a detailed review of car and cycle parking took place with DCC Transport which resulted in a slight reduction in long-term resident parking spaces. The 41 surface-level car parking spaces, which comprise visitor, accessible, loading / taxi and creche drop-off spaces, remained unchanged. No amendments were proposed to any permitted above ground elements of Block PW2 or elements of the wider permitted scheme.

6.6 SUNLIGHT AND DAYLIGHT

The overall configuration and design of the permitted development was influenced by the need to achieve the best possible levels of sunlight and daylight penetration into the development. The proposed amendments seek to

ensure no diminution of light levels noting that the height, scale and massing is as permitted, with some limited reductions in PW5, and for PW2 only internal layouts being amended. A Daylight & Sunlight Report has been carried out on the proposed amended units by DPR. The results are outlined in greater detail in their accompanying Report and summarised below.

- Technical assessments demonstrate that the Proposed Amendments will not result in any material additional adverse impacts upon the daylight or sunlight amenity of existing neighbouring properties or external neighbouring amenity spaces.
- The assessments demonstrate that the Proposed Amendments deliver improved daylight compliance within Block PW5, increasing from 63% within the Permitted Scheme to 78% within the Proposed Amendments. Within Block PW2, whilst some rooms fall below the BRE's recommended daylight criteria, including instances of more significant shortfalls, comparative analysis of a sample of adjoining permitted units demonstrates that daylight constraints are also present within the established building configuration.
- The results provide useful context when considering the daylight performance of the reconfigured accommodation, although the identified shortfalls must also be considered on their individual merits. In relation to sunlight exposure, compliance with the BRE's recommended criteria is more constrained, particularly within Block PW5, where the Proposed Amendments achieve broadly comparable levels of compliance to the Permitted Scheme. Within Block PW2, the results should be considered in the context of the established building configuration, orientation and the inherent sunlight constraints also evident within adjoining permitted accommodation.
- The assessment of the proposed communal amenity space to the east of Block PW5 demonstrates that 59% of the space will receive at least two hours of direct sunlight on 21 March, thereby satisfying the BRE's recommended sun on ground criteria. This provides a positive contribution to the wider residential amenity available to future occupants, particularly where direct sunlight within individual apartments is more constrained.
- It is important to recognise that the BRE Guidelines are advisory in nature and that the numerical target criteria should not be applied rigidly or in isolation. The assessment of daylight and sunlight provision should also have regard to the circumstances of the permitted development, including its urban context, building configuration, design constraints, the performance of the Permitted Scheme and the wider residential amenity provided.
- In this instance, the Proposed Amendments retain the overall permitted building heights and involve only modest changes to the approved building profiles and residential layouts. The established Permitted Scheme therefore provides a relevant benchmark against which to consider the implications of the proposed reconfigurations. The comparative assessments demonstrate that several of the identified daylight and sunlight constraints are characteristic of the established development configuration rather than arising solely from the Proposed Amendments.
- In consideration of the limited nature of the Proposed Amendments, the established planning status and performance of the Permitted Scheme, the findings of the comparative technical assessments, the improvements in daylight provision within Block PW5 and the wider residential amenity available, it is our professional opinion that the Proposed Amendments represent an acceptable outcome in daylight and sunlight terms, consistent with the flexible and context sensitive application of the BRE Guidelines (2022).

Based on the above summary along with detailed material provided in the Daylight & Sunlight Report and accompanying appendices, it is the opinion of the applicant that the proposed amendments to the permitted development (a) will not result in any material additional adverse impacts on neighbouring properties, and (represent an acceptable level of daylight and sunlight to future residents consistent with the scheme as permitted.

6.7 CHILDCARE PROVISION

The permitted scheme included a creche, located within Block PW4. The proposed amendments do not propose any alteration of PW4 and as such the permitted crèche remains as part of the scheme to be constructed.

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 permitted scheme was accompanied by a Part V Proposal and the Order issued by An Coimisiún Pleanala included Condition 26 requiring the provision of a Part V requirement. The proposed amendments do not increase the overall number of units, so no revised proposal is required. The applicant has commenced initial engagement with DCC housing in respect of the Part V requirements.

8. ENVIRONMENTAL CONSIDERATIONS

An Appropriate Assessment (AA) Screening Report and Environmental Impact Assessment (EIA) Screening Report was prepared by Brady Shipman Martin and submitted as part of the parent application, to which this subject application proposes modifications.

8.1 SCREENING FOR APPROPRIATE ASSESSMENT

An Appropriate Assessment Screening Report (AASR) accompanied the planning application for the development permitted and now under construction. That AASR was prepared by Brady Shipman Martin and 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, as set out in the accompanying Appropriate Assessment Screening, 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 conclusion has been reached without considering or taking into account mitigation measures or measures intended to avoid or reduce any impact on European sites.

It is considered that sufficient relevant information has been provided to allow the Competent Authority (Dublin City Council) to carry out an Appropriate Assessment Screening, and reach a determination that the proposed development will not have any likely significant effects on European sites under Article 6 of the Habitats Directive in light of their conservation objectives.

8.2 PRELIMINARY SCREENING FOR ENVIRONMENTAL IMPACT ASSESSMENT

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

As set out in the accompanying EIA Screening prepared by Brady Shipman Martin, the proposed development consists of amendments to development previously permitted under ABP-308917-20 (DCC Ref: SHD0031/20) as amended by DCC Ref: 3406/25.

The screening report concludes that there is no requirement for a mandatory environmental impact assessment as the proposed amendments do not meet the minimum requirements of either Part 1 or Part II of Schedule 5 of the Planning and Development Regulations 2001, as amended.

Likewise, the screening report concludes that there is no possibility of the proposed amendments giving rise to likely significant effects on the environment noting the limited scope of the proposed amendments and there being no change to the number of permitted residential units or to the development site area.

Therefore, it can be concluded that the proposed development, comprising amendments to previously permitted development, will not give rise to likely significant effects on the environment and there is no requirement for environmental impact assessment.

9. CONCLUSION

The statement and report set out herein demonstrates the consistency of the proposed minor amendments to the permitted development at the former Player Wills Site 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 minor alterations to the permitted scheme w, 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.