

21 Drumcondra Park,
Drumcondra,
Dublin 03.

The Secretary,
An Coimisiun Pleanála,
64 Marlborough Street,
Dublin 1
D01 V902.

AN COIMISIÚN PLEANÁLA	
LDG-	<u>083198-25</u>
ACP-	_____
29 SEP 2025	
Fee: € <u>220</u>	Type: <u>In person</u>
Time: <u>12:40</u>	By: <u>Card</u>

Date: 28 September 2025

Re: Planning Reference LRD 6076/25-S3 – Proposed development on Lands at the former Holy Cross College, Clonliffe Road, Dublin 3, and Drumcondra Road Lwr. Drumcondra, Dublin 9.

Applicant: CWTC Multi Family ICAV acting on behalf of its sub-fund DBTR DR1Fund

Dear Sir / Madam,

We wish to submit the following third-party appeal on the grounds outlined below, in respect of the grant of permission on the above referenced development.

We enclose payment in the amount of €220.00

Also enclosed is the Dublin City Council's letter of acknowledgement of our observation of 12 August 2025.

Firstly, the applicant CWTC Multi Family ICAV acting on behalf of its sub-fund DBTR DR1 Fund, has failed to submit as part of their application 'Estimated Costs' or 'Approximate Costs' for the Part V component of the application.

Article 3 of the Planning and Development (Amendment) (No3) Regulations 2015 requires that a planning application shall be accompanied by

'details of the calculations and methodology for calculating values of land, normal construction and development costs and profit on those costs and other related costs such as an appropriate share of any common development works as required to comply with the provisions in Part V of the Act'

This requirement is also set out under Section 16. (ii) of the Planning Application Form - Part 1, and within Part V Guidelines published by the Housing Agency in May 2025 (4th Ed).

Notwithstanding the above, the Department of the Environment, Community and Local Government's Circular PL 10/2015 and Housing Circular 36/2015 of 30 November 2015 states in its conclusion.

'It is not realistic at planning stage for an applicant to provide actual costs for a development for which permission has not been granted, for which a detailed design has not been settled and for which site valuations are not required until the date of the grant of planning permission.

*Accordingly, as is made clear above, it is **estimated costs** that are required to be submitted within the planning application.'*

(emphasis as per the Department circular).

Estimated costs have not been submitted for the Part V component of the application.

Dublin City Council's Validation Letter – Part V of 14th May 2025 clearly states that *'the Planning Department require a Part V Schedule of Accommodation and Approximate Costs to accompany this Validation Letter'*. The applicant has failed to submit approximate costs, as required by the DCC Planning Department.

The applicant's failure to do so negates DCC's Validation Letter.

It is noted that the 'Part V Overview' document submitted within the application comprises: -

- a) correspondence from CWTC Multi Family ICAV of 13th May 2025,
 - b) the Validation Letter from DCC Housing and Community Services of 14th May,
 - c) layout drawings and schedules of potential Part V Units,
- but no detail on approximate costs.

This is clear from the planning documentation examined online and at the public counter of DCC Planning Department.

It is further noted that in considering the planning submission, DCC Planning Department did not choose to obtain Part V Approximate Costs through a Further Information request.

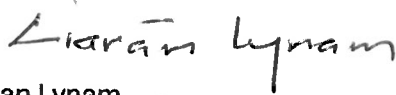
We respectfully suggest that, before reaching a determination on this appeal, the Board seeks details of the Part V Approximate Costs, under Section 132 of the Planning and Development Act 2000 (as amended).

Secondly, the Planning and Development (Large Scale Residential Developments) Act 2021, insertion 32D(2A) states *'The LDR opinion issued by a planning authority under subsection (1) shall be made public when a planning application in respect of the proposed development is made in accordance with section 34.'*

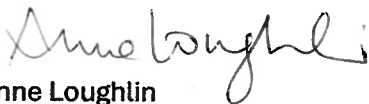
It is noted that the DCC Planning Department did not make public their LRD Opinion while the application was under consideration. The LRD Opinion was uploaded on DCC's planning portal on the 02 September 2025, the same day that the Decision to Grant was posted.

Thanking you for your consideration of the above.

Yours Faithfully



Ciaran Lynam



Anne Loughlin



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Bhaile Átha Cliath
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Ciaran Lynam & Anne Loughlin
21, Drumcondra Park
Drumcondra
Dublin 3

IMPORTANT: Please retain this letter. You will be required to produce it should you wish to appeal the decision issued by the Planning Authority to An Bord Pleanála in relation to this development

PLAN NO. LRD6076/25-S3

DATE RECEIVED: 09-Jul-2025

LOCATION : Lands at the former Holy Cross College, Clonliffe Road, Dublin 3
and Drumcondra Road Lower, Drumcondra, Dublin 9

PROPOSAL : PROTECTED STRUCTURE: DUBLIN CITY COUNCIL: CWTC
Multi Family ICAV acting solely in respect of its sub fund the DBTR
DR1 Fund, intend to apply for a ten-year permission, for a Large-
Scale Residential Development (LRD) on Lands at the former Holy
Cross College, Clonliffe Road, Dublin 3 and Drumcondra Road
Lower, Drumcondra, Dublin 9. The application boundary is a site of
c. 8.7ha, with a developable area of c. 8.25ha. The application site
contains a number of Protected Structures including The Main
College Building (also referred to as The Seminary Building) (RPS
Ref. 1901), Holy Cross Church (also referred to as Holy Cross
Chapel) (RPS Ref. 1901), South Link Building (RPS Ref. 1901),
The Assembly Hall (RPS Ref. 1901), and The Ambulatory (RPS
Ref. 1901). The site is bounded by Drumcondra Road Lower and
the Archbishops House (a Protected Structure, RPS Ref. 2361) to
the West, Clonliffe Road to the South, the Red House (a Protected
Structure, RPS Ref. 1902 & National Monument Ref. DU018-
019001), the Cornmill Apartments and Belvedere College Rugby
Grounds to the East and by the Tolka River to the North. The
proposed development will consist of: 1. Demolition of a number of
former office/college buildings on site, including the New Wing and
Library Wing Buildings which are non-original/late 20th century
addition, (total demolition of c. 6, 327 sq.m) and the construction of
a residential development with a gross floor area (GFA) of c. 106,
181 sq.m (including existing buildings and excluding basement and
podium areas) set out in 12 no. new residential blocks, ranging in
height from 3 to 13 storeys, and re-use of 1 no. existing building, to
accommodate 1, 131 no. apartments, with associated residential
tenant amenity, 1 no. retail unit, 1 no. crèche and re-use of existing
buildings for community/cultural use. The site will accommodate a
total of 382 no. car parking spaces and 2, 619 no. bicycle parking
spaces in separate basement/podium areas and at surface level.
Landscaping will include extensive new public open spaces and



communal courtyards, podiums and roof terraces. 2. The residential buildings range in height from 2-storeys to 13-storeys, accommodating 1, 131 no. apartments comprising 268 no. studios, 282 no. 1-bed units, 392 no. 2-bed units (2 no. 2-bed (3P) & 390 no. 2-bed (4P)), 132 no. 3-bed units and 57 no. 4-bed units. The breakdown of residential accommodation is as follows: Block A1 is a 4 to 8 storey building, including setbacks and balconies, accommodating 234 no. units (47 no. studios, 98 no. 1-bed units, 56 no. 2-bed (4P), 25 no. 3-bed units and 8 no. 4-bed units); Block A2 is a 7 to 9 storey building, including setbacks and balconies, accommodating 68 no. units; (23 no. studios, 8 no. 1-bed units, 37 no. 2-bed (4P)); Block A3 is an 8 to 10 storey building, including setbacks and balconies, accommodating 79 no. units; (26 no. studios, 9 no. 1-bed units, 44 no. 2-bed (4P)); Block A4 is a 6 to 13 storey building, including setbacks, balconies and terraces, accommodating 97 no. units; (29 no. studios, 38 no. 2-bed (4P), 18 no. 3-bed units, 12 no. 4-bed units); Block B1 is a 5 to 7 storey building, including setbacks and balconies, accommodating 69 no. units; (5 no. studios, 15 no. 1-bed units, 26 no. 2-bed (4P), 10 no. 3-bed units, 13 no. 4-bed units); Block B2 is a 6 to 8 storey building, including setbacks and balconies, accommodating 37 no. units; (2 no. studios, 5 no. 1-bed units, 16 no. 2-bed (4P), 13 no. 3-bed units, 1 no. 4-bed units); Block B3 is a 6 to 10 storey building, including setbacks and balconies, accommodating 92 no. units; (16 no. studios, 25 no. 1-bed units, 45 no. 2-bed (4P), 6 no. 3-bed units); Block B4 is a 4 to 6 storey building, including setbacks and balconies, accommodating 53 no. units; (10 no. studios, 17 no. 1-bed units, 10 no. 2-bed (4P), 6 no. 3-bed units, 10 no. 4-bed units); Block C1A is a 5 to 6 storey building, including setbacks and balconies, accommodating 47 no. units; (18 no. studios, 7 no. 1-bed units, 10 no. 2-bed (4P), 12 no. 3-bed units); Block C1B is a 6 to 8 storey building, including setbacks and balconies, accommodating 66 no. units; (15 no. studios, 8 no. 1-bed units, 35 no. 2-bed (4P), 8 no. 3-bed units); Block C2 is a 5 to 7 storey building, including setbacks and balconies, accommodating 88 no. units; (43 no. studios, 8 no. 1-bed units, 2 no. 2-bed (3P), 18 no. 2-bed (4P), 7 no. 3-bed units, 10 no. 4-bed units); Block D2 is a 3 to 7 storey building, including setbacks and balconies, accommodating 145 no. units; (14 no. studios, 48 no. 1-bed units, 53 no. 2-bed (4P), 27 no. 3-bed units, 3 no. 4-bed units); The Seminary Building and South Link Building (Block E2) are existing Protected Structures of 2 to 4 storeys, with a proposed conversion of both buildings to accommodate 56 no. residential units (20 no. studios, 34 no. 1-bed units, 2 no. 2-bed (4P)); and Residential Tenant Amenity Space is provided throughout the scheme in Blocks A4, B1 and D2, totalling c. 1, 989 sq.m and Communal Open Space is provided adjacent each block and at roof level on Blocks A1, A2, A3 & A4, totalling c. 10, 323 sq.m. 3. The site contains a number of Protected Structures including The Seminary Building, Holy Cross



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Chapel, South Link Building, The Assembly Hall and The Ambulatory (RPS Ref. 1901). The application proposes the renovation of the Seminary Building and South Link Building to accommodate residential units and the renovation of the existing Holy Cross Chapel and Assembly Hall buildings for use as community/cultural uses. The wider Holy Cross College lands also include The Red House (RPS Ref. 1902) and the Archbishop's House (RPS Ref. 2361) - these are not included in the application boundary and no works are proposed to these Protected Structures, with the exception of adjacent landscaping and the proposed works to the Drumcondra Road boundary wall, which is inscribed under the Protected Structure of the Archbishop's House as noted below. The works to the Protected Structures within the application site include: The Seminary Building (RPS Ref. 1901): The works include of the careful refurbishment and alteration of the existing 4-storey Seminary Building to provide residential accommodation. It is proposed that an existing adjacent element of the structure, the Library Wing on the northern elevation of the Seminary and the connecting corridors to the Seminary, will be demolished; new infill concrete walls are located to fill the gap where elements are removed. Materials that can be salvaged from this wing will be surveyed, their location noted, and re-used in the conservation and restoration works in The Seminary Building, where possible. The projecting WC blocks (modern addition to overall structure) to the rear (west) elevation of The Seminary Building are also proposed to be demolished. The external envelope of The Seminary Building, with existing chimneys, stone and render finishes, windows and doors is maintained and re-used; The scheme proposes 56 no. apartments installed within the existing shell on the East side of a corridor running along the rear of the plan; The South Link Building (RPS Ref. 1901): The South Link Building consists of a 2-storey stone and render block, with slate roof and bellcote between Holy Cross Chapel and The Seminary Building; this building will be conserved and restored. Alterations to the South Link Building include the insertion of a new doorway within the existing front (Eastern) façade to link the front of the building to the cloister garden, and the insertion of 2 no. apartments in the ground and first floor space. The existing organ at first floor level will be moved to a new location within the Holy Cross Chapel; Holy Cross Chapel (RPS Ref. 1901): Holy Cross Chapel is retained and restored as a community/cultural space. External alterations include a new metal door and interior alterations are limited to services and decoration; a section of the existing tiled floor will be lifted to allow for service connections to furniture installations. The Assembly Hall (RPS Ref. 1901): The Assembly Hall comprises a 2-storey hall with its front façade, steps and projecting porch orientated towards Clonliffe Road. The building is conserved and restored as a community/cultural space as a part of the proposal; Existing doors and windows are retained



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and repaired. The existing Oratory located in the New Wing Building, will be relocated to within the Assembly Hall; The Ambulatory (RPS Ref. 1901): All of the above referenced buildings are linked by a cloister colonnade (i.e. the Ambulatory) around two sides of a central garden; there is a part section of the colonnade on the North side (as referred to as 'and the single storey arcade forming northern perimeter of college quadrangle' on the RPS listing) and an indented (enclosed) section directly outside Holy Cross Chapel; the fourth (east) side is completed by the rear elevation of The Seminary Building. The Ambulatory will be retained as part of the proposed development. The Cloister Garden will be restored and conserved as a part of the project for circulation, amenity and community/cultural use. The courtyard garden will be re-designed and re-planted as a part of the scheme; and Drumcondra Road Boundary Wall Entrance (Inscribed under Archbishop's House, RPS Ref. 2361): The existing entrance gates and the adjoining walls are part of the Archbishop's House Protected Structure. It is proposed to salvage and reuse, the existing stone gate pier to the south and reconstruct this pier in a new location further to the south, widening the gate opening in this location. This will involve the taking down of a small portion of the stone boundary wall. 4. Extensive areas of public open space of c. 23, 842 sq.m or c. 29.89% of the site is provided for, including woodland walk, central seminary lawn, games area, and playground. The proposed landscaping scheme provides for the removal of some existing trees on the site as well as extensive new planting. 5. Non-residential uses include a crèche of c. 587 sq.m in Block A4 (with an external play area of 160 sq.m) and 1 no. retail unit of c. 306 sq.m in Block A1. The scheme includes for the renovation and reuse of the former Holy Cross Chapel and Assembly Hall buildings (c. 2, 048 sq.m) and part of the Ambulatory and Cloister Garden (c. 1, 952 sq.m) for use as community/cultural uses. 6. The site will accommodate a total of 382 no. car parking spaces (345 no. for residents and 41 no. for visitors/accessible use/car club) and 2, 619 no. bicycle parking spaces including cargo bikes, EV charging and shared bikes (1, 981 no. for residents and 638 no. for visitor/staff) in separate basement/podium areas and at surface level. It includes for a single level basement under Blocks B2, B3 & C1, containing 50 no. car spaces, cycle parking, plant, storage areas, waste storage areas and other associated facilities, a single level basement and podium parking under Block D2 containing 136 no. car spaces, cycle parking, plant, storage areas, waste storage areas and other associated facilities and a part podium level basement, part single level basement/part podium under Block A1, containing 155 no. car spaces, cycle parking spaces, plant, storage areas, waste storage areas and other associated facilities. A total of 1, 646 no. resident's bicycle stores are provided at basement/podium/ground level within the blocks, and the remaining 240 no. spaces are located proximate to

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residential buildings in external bike stores. In addition, 41 no. car parking spaces are located at surface level to include visitor, accessible, EV, car club and 4 no. Block D resident spaces, as well as 638 no. short stay bicycle parking spaces. The scheme also includes for 2 no. mobility hubs located at the ground floor of Block A1 and D2. 7. The site is accessed by vehicles, cyclists and pedestrians from a widened existing entrance on Clonliffe Road, at the junction with Jones's Road (which is already permitted as part of the under construction hotel - DCC Reg. Ref. 2935/20 and ABP Reg. Ref. 308193), and through the widening and reopening of an existing access point on Drumcondra Road Lower at the junction with Hollybank Road to act as a left in/left out access. There is no vehicular access through the site for the public or occupants of the sites, other than for maintenance and operations. An additional cyclist and pedestrian access is proposed through an existing access point on Holy Cross Avenue. A relocated entrance to the Archbishop's House through the site is provided on the northern boundary of the Archbishop's House. 8. The proposed application includes all site landscaping works, green roofs, boundary treatments, lighting, servicing, signage, ESB Substations, solar PV panels at roof level on all residential blocks (excluding The Seminary Building (E2)), and all associated and ancillary works, including site development works above and below ground including site drainage and infrastructure. The application contains a statement setting out how the proposal will be consistent with the objectives of the Dublin City Development Plan 2022-2028. An Environmental Impact Assessment Report has been prepared in respect of the proposed development. The LRD application, and Environmental Impact Assessment Report, may also be inspected online at the following website set up by the applicant: www.holycrosscollegelrd.ie.

Note: Submissions/Observations may be made on line at:

<https://www.dublincity.ie/residential/planning/planning-applications/object-or-support-planning-application>

To Whom It May Concern,

The Planning Authority wishes to acknowledge receipt of your **submission/observation** in connection with the above planning application. It should be noted that the Dublin City Council as the Planning Authority will consider this application strictly in accordance with the provisions of the Dublin City Development Plan. The contents of your submission/observation will be considered by the **Case Officer** during the assessment of the above application, and you will be notified of the decision in due course.

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- All queries should be submitted to the e mail address shown above.

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- Please note that a request for Further Information or Clarification of Further information is not a decision.
- **You will not be notified**, if Further Information or Clarification of Further information is requested by the Planning Authority.

Please also note that a weekly list of current planning applications and decisions is available for inspection at the planning public counter.

Opening Hours 9 a.m. - 4.30 p.m. Monday to Friday (inclusive of lunchtime)

A weekly list of planning applications and decisions is available for inspection at all Dublin City Council Libraries & on Dublin City Council's website. www.dublincity.ie.

Yours faithfully,

For ADMINISTRATIVE OFFICER