

Validation Checklist

Lodgement Number : **LDG-087865-26**
Case Number: **ACP-324275-26**
Customer: **Cherryfield Park Residents Association**
Lodgement Date: **12/05/2026 11:47:00**
Validation Officer: **Laura Grady Lawlor**
PA Name: **Dublin City Council South**
PA Reg Ref: **WEBLRD6093/26-S3B**
Case Type: **Appeal - LRD**
Lodgement Type: **Appeal - LRD**



Validation Checklist	Value
Confirm Classification	Confirmed - Correct
Confirm ABP Case Link	Confirmed-Correct
Fee/Payment	Valid – Correct
Name and Address available	Yes
Agent Name and Address available (if engaged)	Yes
Subject Matter available	Yes
Grounds	Yes
Sufficient Fee Received	Yes
Received On time	Yes
3rd Party Acknowledgement	Yes
Eligible to make lodgement	Yes
Completeness Check of Documentation	Yes
Valid Lodgement Channel	Yes

3rd v Grant with conditions LRD Multiple Appeal

BP01M to issue to Appellant with copy of other 3rd party appeal(s) received

BP06 to issue to: 1. Applicant
2. 3rd party Appellant (Cherryfield Ave. Residents' Association)
3. Planning Authority

Enclose copy of this appeal and a copy of any further appeal(s) lodged
(Task-470785-26)

Please keep a copy of the letters for the file and update Case Narrative

Update file cover with Appellant's name

Run at: 13/05/2026 12:09

Run by: Laura Grady Lawlor

Lodgement Cover Sheet - LDG-087865-26

Multiple

Details

Lodgement Date	12/05/2026
Customer	Norwood Park Residents Association
Lodgement Channel	Web Portal
Lodgement by Agent	No
Agent Name	
Correspondence Primarily Sent to	
Registered Post Reference	

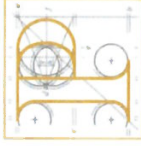
Categorisation

Lodgement Type	Appeal - LRD
Section	Processing

Fee and Payments

Specified Body	No
Oral Hearing	No
Fee Calculation Method	System
Currency	Euro
Fee Paid	220.00
Refund Amount	

21d appeals: 14/05/26



Lodgement ID	LDG-087865-26
Map ID	
Created By	Laura Grady Lawlor
Physical Items included	No
Generate Acknowledgement Letter	
Customer Ref. No.	FE1E95B4
PA Reg Ref	WEBLRD6093/26-S3B

PA Name	Dublin City Council South
Case Type (3rd Level Category)	Appeal - LRD

Observation/Objection Allowed?	
Payment	PMT-069832-26
Related Payment Details Record	PD-069661-26

Make a Planning Appeal

Direct URL: <https://forms.gov.ie/en/68e6334b054d8f2739f8ad5b>

AN COIMISIÚN PLEANÁLA	
LDG-	_____
ACP-	_____
12 MAY 2026	
Fee: €	220
Type:	Online appeal
Time:	_____
By:	Online payment

Response ID

6a0307b26391411de53e1353

Date submitted

12/05/2026

Check if you can appeal to An Coimisiún Pleanála

What type of appeal are you making?

Third-party appeal (I am appealing the planning authority's decision regarding someone else's application)

Have you made a submission on this development to the relevant planning authority?

Yes

Select the statement that applies to you

I am an agent acting on behalf of the appellant

During the appeal we will post/email information and items to the appellant or to the appellant's agent. For this appeal, who should we write to?

The agent acting on behalf of the appellant or prescribed body

Throughout the appeal process, we may issue correspondence to the appellant/agent as selected above by email. Please confirm that you are satisfied to receive correspondence by email

Yes

Appeal type

This section will determine the type of appeal you wish to make and calculate the fee involved. If you qualify for the reduced fee, only that amount will be charged.

Do you wish to request an oral hearing?

No

Please confirm the following fee details are correct:

Yes

Appellant/company details

This section is for details of the person/company who is making the appeal. If you are an agent submitting an appeal on behalf of a person/company, please include their details on this page. You can submit your agent details on the next page if applicable

Appellant's full name/Company name

Norwood Park Residents Association

Is the appellant/company's address in the Republic of Ireland?

Yes

Address

2 NORWOOD PARK
DUBLIN 6
DUBLIN
D06E4A3
Ireland

Phone number

+353838785010

Is there more than one appellant associated with this appeal?

No

Please be advised that An Coimisiún Pleanála will only correspond with one appellant throughout the appeal process. If you wish to include further appellants on the appeal you may do so in your grounds to appeal document. If the appeal is a third party appeal, you must ensure that you have a planning authority submission acknowledgement letter for each appellant listed. This must be uploaded with your appeal documents.

Agent's details

Agent's full name/Company name

Armstrong Planning

Is your address in the Republic of Ireland?

Yes

Address

ARMSTRONG PLANNING
12 CLARINDA PARK NORTH

AN COIMISIÚN PLEANÁLA

LDC-

ACP

DUN LAOGHAIRE
DUBLIN
A96V6F9
Ireland

Phone number

+353838785010

Details about the proposed development

****This section asks for details about the planning authority decision you wish to appeal****

Planning authority

Dublin City Council

Planning authority register reference number

WEBLRD6093/26-S3B

Address of proposed development

Milltown Park
Sandford Road
Dublin 6
Dublin
D06 E4A3
Ireland

Grounds for appeal

****You can also attach further supporting materials on the next page****

Supporting material

If you wish you can include supporting materials with your appeal. Supporting materials include photographs, plans, surveys, drawings, technical guidance documents and so on.

Please note An Coimisiún Pleanála will receive a complete copy of documents/drawings/maps that were submitted at planning authority stage. When submitting supporting material, please only include new documents. (This does not apply to third party appeals where we will always require a copy of your planning authority submission acknowledgement letter.)

If you have added attachments, submitting the form may take a few moments. Thanks for your patience.



Report:

Application Ref:

Proposal:

Appeal Site:

Appellant:

Appellant Address:

Date:

THIRD-PARTY APPEAL

Dublin City Council Reg. Ref. WEBLRD6093/26-S3B

Large-Scale Residential Development of 562 no. Residential Units

Milltown Park, Sandford Road, Dublin 6, D06 V9K7

Norwood Park Residents Association

c/o Jerome White, 2 Norwood Park, Ranelagh, Dublin 6, D06 E4A3

12th May 2026

ARMSTRONG PLANNING



1. INTRODUCTION & EXECUTIVE SUMMARY

Armstrong Planning – with offices at 12 Clarinda Park North, Dún Laoghaire, Co. Dublin, A96 V6F9 – have been retained by the Norwood Park Residents Association (the Appellant), with an address at c/o Jerome White, 2 Norwood Park, Ranelagh, Dublin 6, D06E4A3, to prepare and submit this third-party planning appeal in relation to the site at Milltown Park, Sandford Road, Dublin 6, D06V9K7 (the appeal site), for a Large-Scale Residential Development comprising the provision of 562 no. residential units (comprising 6 no. three-bed courtyard houses and 556 no. apartment units) in seven blocks ranging in height from two to eight storeys. The proposal also includes provision for demolition of several existing structures on the site and the provision of cultural/community space within existing buildings, a café/restaurant, a creche, ancillary residents' amenities and facilities, as well as car and bicycle parking.

The residents represented in this appeal reside in close proximity to the appeal site and stand to be significantly affected by the form and scale of the proposed development, and together we respectfully ask An Coimisiún Pleanála to have proper regard to the following grounds of appeal, which are summarised below:

- **Excessive density proposed is contrary to the *Compact Settlements Guidelines*:** In the period since the 2021 SHD application and the 2023 LRD application were made in respect of the appeal site, the publication of the *Sustainable and Compact Settlements Guidelines for Planning Authorities* (the *Compact Settlements Guidelines*) in 2024 resulted in a significant change in statutory planning policy for residential development. The subject application proposes a residential density of 140 units per hectare, notwithstanding that this suburban site is not located in a 'City - Urban Neighbourhoods' area and has been previously determined to be situated in an intermediate area. The residential density now proposed on the appeal site far exceeds the maximum density of 80 units per hectare for intermediate, 'City – Suburban' areas set out in the *Compact Settlements Guidelines*. The planning application does not identify any "exceptional circumstances" within the meaning of Section 3.2.1 of the Guidelines, which would warrant granting permission for residential densities so far outside the density ranges for this location. To the contrary, the 'Z12' Zoning Objective for the site, which seeks "to safeguard the essential open character" of institutional lands, would suggest that the appeal site is not suitable for the tall, high intensity and high density form of development now proposed.
- **Excessive building height proposed is contrary to the *Building Height Guidelines*:** The development now proposed (rising to eight storeys in height) does not adhere to the 'Development Management Principles' with which applicants must comply (under SPPR 3A of the *Urban Development and Building Height Guidelines*) where permission is sought for structures that are taller than the prevailing building heights of the area. The application does not include an assessment of the impact of the development on the "essential open character" of the site within the meaning of the 'Z12' Zoning Objective and, in these circumstances, the Applicant cannot demonstrate that the proposal would successfully integrate into the existing character of the area. Given this and given that the proposal is not located in an area suitable for taller buildings within the meaning of those Guidelines, we submit that the proposed eight-storey height on this site at a suburban, intermediate location is excessive and contrary to the *Building Height Guidelines*.
- **Methodologies Used in the Submitted Daylight and Sunlight Assessment Are Not Consistent with Relevant Guidance:** The methodologies used in the Applicant's *Daylight and Sunlight Assessment* are not consistent with relevant guidance, such as *Site layout planning for daylight and sunlight: A guide to good practice* (the BRE Guide) and *BS EN 17037: 2018: Daylighting in Buildings*. As a result, there is a potential for the daylight impact assessment to

be misleading to members of the public. There is also a potential that the findings of the assessment of daylight access within the proposed development overestimate daylight access within proposed units due to the assumptions made in the assessment model. Given this, it is submitted that the *Daylight and Sunlight Assessment* submitted with the planning application does not provide sufficient information on the daylight performance of the proposed scheme, within the meaning of relevant local and statutory planning policy, and does not provide a sufficient basis for An Coimisiún Pleanála to make a decision on the application.

- **Significant negative impact on existing residential amenity:** Due to its excessive height, scale, bulk and density adjoining the low-density, low-rise neighbourhoods at Norwood Park and Cherryfield Avenue, the proposal will result in significant negative impacts on the residential amenity of existing neighbouring residential lands due to loss of visual amenity and overbearance, loss of privacy and traffic hazard due to overspill parking.

2. GROUNDS OF APPEAL

2.1 Excessive Density Proposed is Contrary to the *Compact Settlements Guidelines*

Before turning to the substance of the *Compact Settlements Guidelines* analysis, we address the proposition advanced at the head of the Planning Assessment in the Planner's Report – that (the principle of development on this site of both this density, unit mix, height, visual impact, design and residential amenity had previously been considered acceptable by both Dublin City Council and An Coimisiún Pleanála) – the Planning Authority's reasoning on this point resting on the 2023 Large-Scale Residential Development on the appeal site (DCC Reg. Ref. LRD6026/23-S3, ABP Ref. ABP-317921-23).

With respect, that proposition cannot bear the weight the Planner's Report places upon it. The 2023 permission is the subject of pending judicial review proceedings, with the High Court decision awaited at the time of the Planning Authority's determination of the subject application – a fact recorded in the Planner's Report itself. More fundamentally, the 2023 permission was assessed under the policy framework then in force, in advance of the publication of the *Compact Settlements Guidelines* in 2024. The principle of development at the density now proposed cannot, by definition, have been weighed against the operative statutory guidance, because that guidance did not exist when the principle was settled. The subject application is the first application on the appeal site since the publication of the *Compact Settlements Guidelines*, and falls to be assessed on its merits against that guidance.

The *Compact Settlements Guidelines* provides policy and guidance in relation to the planning and development of settlements, including rural towns and villages, and sets out density ranges for residential development with reference to the national settlement hierarchy. Section 3.2.1 of the Guidelines explains:

"The national settlement hierarchy defined at a national level by the NPF, at a regional level by the RSEs and at local level by city and county development plans, forms the basis for the density approach. Section 3.3 describes settlements at each tier (or groups of tiers) in the national settlement hierarchy and for each tier sets out:

- (a) priorities for compact growth,*
- (b) areas common to settlements at each tier, and*
- (c) recommended density ranges for each area.*

Similar to the application of the 2009 Guidelines, when applying the policies and objectives of these Guidelines in relation to density in the preparation of a statutory development plan and in the consideration of a planning application, it will be necessary for the planning authority to identify:

- (a) the most applicable settlement category based on the categories described in Section 3.3,*
- (b) the most applicable area type based on the area descriptions detailed in Section 3.3 (e.g. central, urban, suburban or edge - refer also Figure 3.1), and*
- (c) the recommended density range for that area.*

*Following this, the decision maker(s) will need to determine the appropriate density range(s) for the area or site. The **densities should generally be within the ranges set out in Section 3.3** and can be refined further in accordance with the guidance set out in Section 3.4. It may be necessary and appropriate **in some exceptional circumstances** to permit densities that are above or below the ranges set out in Section 3.3. In such circumstances, the planning authority (or An Bord Pleanála) should **clearly detail the reason(s) for the deviation** in the relevant statutory development plan or as part of the decision-making process for a planning application, based on considerations relating to the proper planning and sustainable development of the area.” [Emphasis added.]*

The sections below consider how the *Compact Settlements Guidelines* apply to the development now proposed on the appeal site.

2.1.1 Unclear Whether Public Open Space May Be Included in the Net Site Area on Site Zoned Objective Z12 When Calculating Net Residential Density

The Applicant’s *Planning Report & Statement of Consistency*¹ (the Planning Report) sets out that the total site area (gross) is c. 4.74 hectares (c. 47,335 sqm), which is broken down as follows:

- The net site area or developable site area of c. 4.26 hectares (c. 42,547 sqm) at Milltown Park, Sandford Road
- Road works to Sandford Road and Milltown Road adjacent to the 2 No. entrances to the site (1 No. existing and 1 No. newly proposed): c. 0.16 hectares (c. 1,597 sqm); and
- Drainage works from Milltown Road to Eglinton Road: c. 0.32 hectares (c. 3,191 sqm).

The Planning Report refers to a net residential density of 140 dph calculated on the basis of a net site area of 4.26 hectares.

However, it is noted that Table 1 of Appendix B provides that “Other areas of land that **cannot be developed** due to environmental sensitives, topographical constraints (i.e. steepness) and/or are subject to flooding” should be excluded from the net site area.

Section 14.7.12 of the Development Plan sets out policy for lands zoned ‘Z12’: Institutional Land (Future Development Potential). It states that “Where lands zoned Z12 are to be developed, a

¹

It is noted that the Planning Report & Statement of Consistency does not appear to have been submitted with the planning application. For the purposes of this appeal, the Planning Report & Statement of Consistency was reviewed on www.sandfordplanninglrd2.ie

minimum of 25% of the site will be required to be retained as accessible public open space to safeguard the essential open character and landscape features of the site... On Z12 lands, the minimum 25% public open space shall not be split up into sections/fragmented"

As such, the zoning objective clearly states that 25% of the site area of any lands zoned 'Z12' shall not be developable for residential use and that, on each site, that 25% area must be retained in one piece and shall not be split up into pieces. Given that, unlike other residentially zoned sites, the 'Z12' zoning effectively sterilises a portion of the site from development, it could be argued that this should be reflected in calculating the net developable area of any 'Z12' site. In the case of the subject site, that would suggest the following:

47,335 sqm	Total Site Area (gross)
- 11,833.75	25% of total site area that cannot be developed and must be retained as public open space
- 1,597 sqm	Road works and entrances
- 3,191 sqm	Drainage works
= 30,713.25 sqm	Net Site Area / Net Developable Site Area

This would change the net residential density calculation (at page 144 of the Planning Report) to the following:

Stage	Metric	Calculation	Figure
A	Net Site Area (sqm)		30,713.25
B	Total GFA (sqm)	C+D	50,196
C	Residential GFA (sqm)		47,247
D	Non-Residential GFA (sqm)		2,949
E	Residential GFA as Proportion of Total GFA (%)	C/B	94.1%
F	Pro Rata Site Area (sqm)	AxE	28,901.17
G	Number of Dwellings		562
H	Net Residential Density (dph)	G/F*10000	194.45 dph

Our primary submission is that, at the Applicant's own stated figure of 140 dph, the proposal exceeds the 80 dph upper bound of the density range recommended by the *Compact Settlements Guidelines* for intermediate, 'City – Suburban/Urban Extension' locations (as developed at Sections 2.1.2 and 2.1.3 below) by some 75%. The Planner's Report contains no assessment of the proposed density against the criteria of those Guidelines. The density assessment in the Planner's Report (under the heading "*Plot Ratio, Site Coverage and Density*") instead relies on Policy SC10 of the Development Plan, the *Sustainable Residential Development in Urban Areas Guidelines* (2009) and the *Urban Development and Building Height Guidelines* (2018), disposing of the density question in a single sentence to the effect that the density is "*suitable given its location which is within walking distance to Luas and a number of bus routes and also considering the extensive amount of public and*

communal open space provided". The site is not classified under the *Compact Settlements Guidelines* settlement hierarchy, no recommended density range under those Guidelines is identified, and no "exceptional circumstances" under Section 3.2.1 of those Guidelines are identified or weighed. The Planning Authority has accordingly determined the application by reference to superseded statutory guidance, and the exceedance of the *Compact Settlements Guidelines* density range – of itself, and on the Applicant's own figure – is sufficient to ground refusal.

Without prejudice to that primary submission, the recalculation set out above demonstrates that the headline 140 dph figure flatters the scheme by including, within the denominator, the portion of the site that the 'Z12' zoning objective precludes from residential development. The true intensity of residential development on the developable portion of the appeal site is, on the Applicant's own pro-rata methodology, materially higher — of the order of 194.45 dph. We do not, however, ask the Commission to substitute that figure for the Applicant's stated 140 dph in determining this appeal. We would observe in passing that the Planner's Report itself describes 140 dph as the "gross residential density" of the scheme, whereas the Applicant's *Planning Report & Statement of Consistency* describes the same figure as a *net* residential density. On the Planner's Report's own characterisation, the *net* density of the scheme – properly calculated under the *Compact Settlements Guidelines* – would be higher still.

For the avoidance of doubt, this appeal proceeds on the basis of the Applicant's stated density of 140 dph throughout. The argument that follows succeeds at that figure; the recalculation underscores, rather than founds, the case for refusal.

2.1.2 The Appeal Site does not meet the criteria for 'City – Urban Neighbourhoods'

As noted above, the proposed development is for 562 no. residential units and is stated to have a net residential density of 140 dph. At page 144, the Planning Report makes reference to the *Compact Settlements Guidelines* and suggests that the appeal site is located within a 'City – Urban Neighbourhoods' area. The Planning Report does not provide any justification or explanation to support this contention.

Table 3.1 of the *Compact Settlements Guidelines* defines 'City – Urban Neighbourhoods' as follows:

"The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations⁷, (iii) town centres designated in a statutory development plan, and (iv) lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.

⁷ Described in Section 4.4.4 of the *Development Plans Guidelines for Planning Authorities 2022*. The *Dublin City Development Plan 2022-2028* details Strategic Development and Regeneration Areas in Chapter 13; and the *Cork City Development Plan 2022-2028* details Strategic Consolidation and Regeneration Areas in Chapter 10."

The table below sets out each of the criteria for 'City - Urban Neighbourhoods' and explains whether the appeal site meets each of the criteria:

Compact Settlements Guidelines Criteria for 'City – Urban Neighbourhoods'	How the Criteria Apply to the Appeal Site
(i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses	The Application Site is not located in the area "around the city centre" and the area is predominantly characterised by low-density, residential development.
(ii) strategic and sustainable development locations⁷ ⁷ Described in Section 4.4.4 of the Development Plans Guidelines for Planning Authorities 2022. The Dublin City Development Plan 2022-2028 details Strategic Development and Regeneration Areas in Chapter 13; and the Cork City Development Plan 2022-2028 details Strategic Consolidation and Regeneration Areas in Chapter 10.	The Application Site is not identified in the Development Plan as a Strategic and Sustainable Development Site within the meaning of the Development Plan Guidelines for Planning Authorities.
(iii) town centres designated in a statutory development plan	The Application Site is not designated as a town centre in the Development Plan.
(iv) lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) The definition of high-capacity public transport nodes at Table 3.8 includes: "Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor' stop."	The Application Site is more than 1 km away from any high capacity urban public transport node and more than 500 m walking distance away from an existing or planned BusConnects 'Core Bus Corridor' stop. Specifically, the closest entrance to the appeal site (i.e. the Sandford Road entrance) is approximately 1.1 km walking distance from the Beechwood Luas Stop. Moreover, even if the site were within 1 km of the Beechwood Luas stop, it is noted that Beechwood does not qualify as an interchange or node as it does not intersect with other transport modes. Moreover, the the closest entrance to the appeal site (i.e. the pedestrian entrance at the junction of Milltown Road and Sandford Road) is approximately 725-780 m the closest BusConnects 'Core Bus Corridor' bus stops. It is further noted that the proposed residential buildings are located at a considerable remove from the entrances to the site, which means that the actual walking distances from dwellings to public transport are greater than those mentioned above.

Having regard to the above, it is clear that the appeal site does not fit within the *Compact Settlements Guidelines* definition of 'City – Urban Neighbourhoods'. Moreover, it is evident from the density ranges set out at Table 1 of Appendix 3 of the Development Plan that the Planning Authority would consider 'City - Urban Neighbourhoods' areas to be located within the Canal Belt.

Fig. 1. Table 1 from Appendix 3 of the Development Plan

Location	Net Density Range (units per ha)
City Centre and Canal Belt	100-250
SDRA	100- 250
SDZ/LAP	As per SDZ Planning Scheme/LAP
Key Urban Village	60-150
Former Z6	100-150
Outer Suburbs	60-120

As such, the residential density recommendations set out in the Guidelines for 'City – Urban Neighbourhoods' are not appropriate to the appeal site and would likely result in an unsustainable and car dependent form of development.

2.1.3 The Application Site is a 'City – Suburban/Urban Extension' Site, but is not considered 'accessible' within the meaning of the Guidelines

Table 3.1 of the Compact Settlement defines 'City - Suburban/Urban Extension' as being:

"Suburban areas are the lower density car-orientated residential suburbs constructed at the edge of cities in the latter half of the 20th and early 21st century, while urban extension refers to the greenfield lands at the edge of the existing built up footprint that are zoned for residential or mixed-use (including residential) development⁸. It is a policy and objective of these Guidelines that residential densities in the range 40 dph to 80 dph (net) shall generally be applied at suburban and urban extension locations in Dublin and Cork, and that densities of up to 150 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8).

⁸ Section 28 Guidelines, Development Plan Guidelines for Planning Authorities 2022 set out policy requirements in relation to the zoning of lands for residential purposes."

Table 3.8 defines 'accessible' locations as "Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services." As the appeal site is more than 700 m from the nearest high frequency urban bus service on the N11 Stillorgan Road, the appeal site cannot be considered an accessible location within the meaning of the Compact Settlements Guidelines. The appeal site is rather situated at an 'intermediate' location under Table 3.8, which includes "Lands within 500-1,000 metres (i.e. 10-12 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services; and Lands within 500 metres (i.e. 6 minute walk) of a reasonably frequent (minimum 15 minute peak hour frequency) urban bus service."

The appeal site's classification as an 'intermediate' rather than 'accessible' location is not novel: it has been determined previously by the Commission's own Inspector in connection with this very site. In the appeal of the 2023 Large-Scale Residential Development on the appeal site (DCC Reg. Ref. LRD6026/23-S3, ABP Ref. ABP-317921-23), the Inspector expressly assessed the appeal site as falling within an "intermediate urban location" within the meaning of the Sustainable Urban Housing:

Design Standards for New Apartments, Guidelines for Planning Authorities (the *Apartment Guidelines*) – the predecessor instrument to the *Compact Settlements Guidelines* on the question of accessibility-based density tiers. The locational characteristics that informed that classification – distance from high-frequency public transport, the predominantly low-density suburban character of the surrounding area – have not materially changed in the intervening period. We respectfully submit that the Commission's earlier characterisation carries directly forward into the analogous accessibility test under Table 3.8 of the *Compact Settlements Guidelines*, and that the Applicant's contention that the appeal site falls within the 'City – Urban Neighbourhoods' category (for which densities up to 250 dph are open for consideration) is inconsistent with the Commission's own characterisation of this site under the materially analogous predecessor framework. The status of the underlying permission (which is, as the Planner's Report records, the subject of pending judicial review proceedings) does not bear on the persuasive force of the Inspector's locational finding, which is a planning judgment recorded on the public file and which speaks to the same underlying facts that arise on this appeal.

Having regard to the 'intermediate' location of the appeal site, we submit that the lower range of 40-80 units per hectare should apply. The intention of the Guidelines with regard to preserving a tiered approach based on the accessibility of development lands is clear (emphasis added):

- at Section 3.1, that *"Government policy requires a continuation of the tiered approach to residential density seen under the Sustainable Residential Development in Urban Areas Guidelines, 2009, with highest residential densities at the most central and accessible urban locations and more compact and sustainable forms of development overall."*;
- at Section 3.4, that *"The application of the density ranges in the preparation of statutory development plans and in the consideration of individual planning applications will be subject to local determination by the planning authority, or by An Bord Pleanála in the case of an appeal or direct application. The density ranges set out in Section 3.3 should be considered and refined, generally within the ranges set out, based on consideration of centrality and accessibility to services and public transport; and considerations of character, amenity and the natural environment."*
- and at Section 1.3.2, that *"higher densities and taller buildings that exceed the traditional scale will be encouraged in the most central and accessible parts of our cities and larger towns, particularly in large regeneration areas, and subject to the protection of historic fabric, character, amenity, natural heritage, biodiversity and environmental quality."*,
- and also at Section 1.3.2, that *"mid-rise medium density housing will have a critical role to play outside of the urban cores at accessible and intermediate locations in particular, in combination with traditional housing."*

2.1.4 Proposed Density is Excessive for an intermediate, 'City – Suburban/Urban Extension' Site

Having regard to the above and to the fact that the site cannot be considered 'accessible' within the meaning of Table 3.8, we submit that the proposed residential density of 140 units per hectare is excessive and inconsistent with the *Compact Settlements Guidelines*.

The planning application does not identify any *"exceptional circumstances"* within the meaning of Section 3.2.1 of the Guidelines, which would warrant granting permission for residential densities so far outside the density ranges for this location. To the contrary, the 'Z12' Zoning Objective for the site seeks *"to safeguard the essential open character"* of institutional lands, which is not consistent with the tall, high intensity and high density form of development now proposed.

The case for refusal is not limited to the *Compact Settlements Guidelines*. The Development Plan itself qualifies its support for higher density development with explicit character and amenity tests. Section 15.5.5 of the Development Plan provides that *"the density of a proposal should respect the existing character, context and urban form of an area and seek to protect existing and future amenity"*. Policy QHSN10 supports residential development at sustainable densities only *"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 Applicant's own *Landscape and Visual Impact Assessment* **concedes** that the proposed development is *"deliberately a departure from the existing character of (part of) its immediate environs"*. By the Applicant's own admission, the proposed density does not respect the existing character or successfully integrate with the surrounding area, and the Development Plan's policy framework is not satisfied independently of the analysis under the *Compact Settlements Guidelines*.

As such, the position is that the proposed residential density of 140 units per hectare is excessive for an intermediate, 'City - Suburban/Urban Extension' site and contrary to the proper planning and development of the area as outlined in statutory planning policy and that planning permission should be refused.

2.2 Excessive Height Proposed is Contrary to the *Building Height Guidelines*

The appeal site is located in an established residential area in a low-density, low-rise, suburban neighbourhood. The lands surrounding the appeal site are characterised by the following building typologies: two-storey, semi-detached houses at Norwood Park; two-storey, terraced houses at Cherryfield Avenue Lower and Cherryfield Avenue Upper, with two to four-storey blocks at its southern end; two-storey (over basement), semi-detached houses on Sandford Road; and two to three-storey residential buildings fronting on to Milltown Road at Mount Sandford. While it is noted that there are two, six-storey apartment developments in the vicinity of the appeal site on Milltown Road, it is significant that these buildings are located in such close proximity to the taller buildings of the Jesuit complex at Milltown Park.

The subject application proposes that the apartment blocks would rise to eight storeys in height. Where other developments on Milltown Road have sought to respond to the existing built environment in terms of height, the highest part of the proposed development (eight storeys) is located on Sandford Road (the surrounding context being two-storey houses to the east and two-storey, over basement houses to the north). As is evident from the 'Building Heights' diagram indicating the Applicant's height strategy for the site (page 51 of the Masterplan + Architectural Design Statement), almost all of the increased building height (five to seven storeys) is proposed on parts of the site bounded by a context of two-storey and two-storey, over basement, buildings.

In respect of building height in suburban locations, the *Urban Development and Building Height Guidelines for Planning Authorities* (the *Building Height Guidelines*) provide, at paragraph 3.6, that:

"Development should include an effective mix of 2, 3 and 4-storey development which integrates well into existing and historical neighbourhoods and 4 storeys or more can be accommodated alongside existing larger buildings, trees and parkland, river/sea frontage or along wider streets."

Section 3.1 of the *Building Height Guidelines* sets out 'Development Management Principles' with which Applicants must comply (under SPPR 3A) where permission is sought for structures that are taller than the prevailing building heights of the area. Section 3.2 of the *Building Height Guidelines* requires that *"The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport."* As discussed in more detail above, the appeal site is not considered *"accessible"* within the meaning of the *Compact Settlements Guidelines* and,

therefore, could not be said to be *“well served by public transport with high capacity, frequent service and good links to other modes of public transport.”*

Section 3.2 also states that: *“In the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/ An Bord Pleanála, that the proposed development satisfies the following criteria ... At the scale of district/ neighbourhood/ street The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape...”*. However, it is evident from documents submitted with the application that this is not the case for the proposed development.

Chapter 9: Landscape and Visual Impact Assessment (LVIA) of the submitted Environmental Impact Assessment Report by the Applicant expressly states that the *“proposed development is deliberately a departure from the existing character of (part of) its immediate environs”* (page 9-50) and that townscape change *“of some significance is unavoidable”* (page 9-60).

The ultimate impact assessment of the LVIA that impacts would be moderate in extent and positive in character appears to be predicated on the basis of:

- An assessment of the site as having a *“parkland character”* with significant emphasis on the retention of certain trees, but with no assessment of the impact of the development on the site’s *“essential open character”* within the meaning of the ‘Z12’ Zoning Objective. It is noted in this regard that, notwithstanding the requirement that any development of the site retain a minimum 25% public open space and that the retained space shall not be split up into sections or fragmented, the subject application proposes that the proposed Blocks A1 and A2 would sit in the centre of the public open space, with the public open space forming strips of land between those blocks and the boundaries and other proposed buildings.

This configuration sits uneasily not only with the ‘Z12’ zoning objective but with Section 15.6.12 of the Development Plan, which expressly provides in respect of public open space that *“inaccessible or narrow unusable spaces will not be accepted”*.

- Repeated justification of impacts on the grounds that the extent of visual change is an inevitable consequence of high density development of an opportunity site in circumstances where the site is neither identified for high density development or designated as an opportunity site in the Development Plan. Specifically, Section 9.7.2.2, which sets out the Townscape Effects for the Operation Phase states: *“Townscape change of some significance is unavoidable with the development of a large opportunity site in a prominent position (at a junction, with frontage to two main thoroughfares), at the interface between two different character areas (one being characterised by low density development). Contemporary, high density development that fits comfortably into the Milltown Road area will inevitably contrast with the Sandford Road area.”*

In short, the LVIA does not include an assessment of the impact of the proposed development on the key element of the landscape and visual character of the appeal site: its *“essential open character”* within the meaning of the ‘Z12’ Zoning Objective. The LVIA also appears to misidentify the site as an opportunity site for high density development and then proceeds to base the assessment of the significance of townscape effects on that misidentification. As such, the LVIA cannot form the basis for the justification of increased building height on the appeal site within the meaning of the *Building Height Guidelines*.

Given this and in the absence of adequate landscape impact assessment to ensure compliance with the Zoning Objective, we respectfully submit that the Applicant has not demonstrated that the appeal site is appropriate for increased building height. We, therefore, submit that the proposed

eight-storey height on this site at a suburban, intermediate location is excessive and contrary to the *Building Height Guidelines* and should be refused permission.

2.3 Methodologies Used in the Submitted Daylight and Sunlight Assessment Are Not Consistent with Relevant Guidance

2.3.1 Assessment approach taken in the Daylight Impact Analysis is inconsistent with the BRE Guide

Site layout planning for daylight and sunlight: A guide to good practice (the BRE Guide) outlines methodologies for assessing impacts of development on daylight access within existing buildings and sets out standards for daylight performance which can be used in determining the likely extent of impact. Its use for daylight impact assessment under the Irish planning system is recommended by Appendix 16 of the Development Plan and the *Compact Settlements Guidelines*.

However, we submit that the approach taken in the Applicant's *Daylight and Sunlight Assessment* (December 2025) does not properly reflect the recommendations of the BRE Guide and could serve to dilute how the likely impact of the proposal on the neighbouring existing buildings is interpreted. For example:

- The BRE Guide recommends that, for rooms with a conventional window design, a Vertical Sky Component (VSC) of at least 27% will usually achieve adequate daylighting. In relation to impacts of new development on existing buildings, Section 2.2.23 provides that *"the diffuse daylighting of the existing building may be adversely affected ... if ... the VSC measured at the centre of an existing main window is less than 27%, and less than 0.8 times its former value"*. This appears to have been misinterpreted in the submitted *Daylight and Sunlight Assessment Report*, whereby 3D Design Bureau have instead generated a *"Recommended minimum VSC"*. Section A.1 (page 35) of the submitted *Daylight and Sunlight Assessment Report* provides as follows: *"to determine the recommended minimum Value, 80% of the Baseline VSC value has been calculated. If this value is above the 27% threshold, a target value of 27% will be applied. If 80% of the baseline value is below 27%, then 80% of the baseline value is the appropriate target value."* This is not a correct application of the BRE Guide. The correct methodology for generating alternative target values is set out in Appendix F: Setting alternative target values for skylight and sunlight access, together with the circumstances in which it is appropriate to set alternative target values. Quoting a *"Recommended minimum VSC"* gives the impression that daylight is adequate in the existing room when that may not be the case.
- Tables A.1.1-A.1.4 describe the level of *"Compliance with BRE Guidelines"*. Section A.1 states that *"This column states the compliance of the Proposed VSC Value with the recommended minimum VSC as per the BRE Guidelines"*. However, in multiple instances, the tables indicate that, under a proposed scenario, windows in existing buildings will remain *"BRE Compliant"* when those windows will receive less than, and in some cases, considerably less than 27% VSC. It is not accurate to describe any conventional window in an existing building receiving less than 27% VSC as *"BRE Compliant"*. This gives the impression that daylight will remain adequate in some existing rooms after the construction of the proposed development when that may not be the case.

Having regard to the above, we submit that the *Daylight and Sunlight Assessment* (December 2025) does not clearly outline the true impact of the proposal on daylight access to neighbouring residences. The *Daylight and Sunlight Assessment* is not consistent with the recommendations of the BRE Guide and has likely misled members of the public as to the likely impact of the proposal on loss of light to neighbouring dwellings.

2.3.2 Assessment of Daylight Analysis within the Proposed Development Assumes Use of Brighter Materials and More Transparent Glass than is Recommended by Relevant Standards

Appendix 16 of the Development Plan sets out detailed requirements for the assessment of daylight access within new residential developments, including requiring assessment of target illuminance in all proposed habitable rooms with reference to the National Annex of BS EN 17037: 2018 and to the BRE Guide.

Both the BS EN 17037: 2018 and the BRE Guide are explicit about the parameters that should be used in building the assessment model for assessment of daylight access in proposed rooms. The table below outlines the values used by 3D Design Bureau compared with the default parameters which the BS EN 17037: 2018 recommends should be used in carrying out verified calculations and the ranges of acceptable values.

The BRE Guide also includes, at Table C4, recommended surface reflectances and cites the following default reflectance values: interior walls: 0.5; ceilings: 0.7; floors: 0.2; exterior walls and obstructions: 0.2; and exterior ground: 0.2. Paragraph C24 states that: “Maximum reflectances for light pastel walls should not exceed 0.7 in the calculations”.

As illustrated by Table 1 below, the submitted daylight analysis generally assumes the use of brighter materials than the default values recommended by *EN 17037: Daylighting in Buildings* for the carrying out of verified calculations and the default values set out in the BRE Guide.

Table 1: Comparative table comparing the material reflectance assumptions made in the submitted Daylight and Sunlight Assessment Report with the recommendations of the Daylighting in Buildings (EN 17037)

3D Design Bureau Report			EN 17037 Recommendations		
Object	Material	Reflectance	Object	Default Reflectance (recommended for verified calculations)	Reflectance Range
Exterior walls	Standard Brick	0.3	Exterior walls	-	0.2 – 0.4
	Light Brick	0.4			
	Dark Brick	0.15			
	Render	0.6			
	Concrete	0.4			
Ground cover	Paving	0.4	Ground	0.2	0.2
	Tarmac	0.2			
	Grass	0.2			
Interior Walls	White paint	0.8	Interior Walls	0.5	0.5-0.8
Interior Ceiling	White paint	0.8	Interior Ceiling	0.7	0.7-0.9
Interior Floor	Light timber	0.4	Interior Floor	0.2	0.2-0.4
Miscellaneous	Miscellaneous	0.5	-	-	-

Moreover, table 2.5.1 of the 3D Design Bureau Report also includes the following:

Fig. 2. Extract from Table 2.5.1 of the Applicant's Daylight and Sunlight Assessment prepared by 3D Design Bureau

Glass	Glasstransmittance value	0.80
	Maintenance factor	0.91
	G lassad justed for maintenance	0.73
	Frosted glass	0.5

The Report does not include any references that might identify the origin of these figures and does not explain how transmittance values and maintenance factors were applied to the windows in carrying out calculations. The above excerpt from Table 2.5.1 would seem to suggest that the assessment assumes a glass transmittance value of 0.80 and a maintenance factor of 0.91 and then combined those factors in order to then come up with an overall assumption that 73% of available light would be transmitted through the glass serving rooms to proposed units. This assumption is much higher than the recommendations of the BRE Guide, which assumes that something of the order of 52% to 63% of available light will be transmitted through the glass of windows in urban areas (i.e. having regard to the urban density of the proposal for which the Applicant is now seeking permission, it is assumed that the urban maintenance factors must be applied to the assessment. However, the assumptions made in the submitted report would even exceed recommendations for light transmittance of windows in a rural context). Table 2 below compares the glass transmittance values and glass maintenance factors applied in the submitted *Daylight and Sunlight Assessment* to those recommended by the BRE Guide.

Table 2: Comparative table comparing the assumptions made in the submitted Daylight and Sunlight Assessment Report with the recommendations of the BRE Guide

3D Design Bureau Report		BRE Guide Recommendations		
Glass Transmittance Value	0.8	Glass Transmittance Value	Clear double glazing with low emissivity coating	All other windows
			0.68	Manufacturer's normal incidence light transmittance x 0.91
Type of Window	Maintenance Factor	Type of window	Maintenance Factor	
			Rural / suburban	Urban
All	0.91	Vertical, no overhang	0.96	0.92
		Vertical, sheltered from rain, e.g. by balcony or overhang	0.88	0.76
		Sloping rooflight	0.92	0.84
		Horizontal rooflight	0.88	0.76

The BRE Guide also requires the application of a framing factor where window framing is not included in the assessment model. There is no reference to this in the report so it is unclear what approach was taken in the submitted *Daylight and Sunlight Assessment*.

The use of brighter materials, higher glazing transmittance values and higher glass maintenance factors than those recommended in the EN 17037 and the BRE Guide carry the potential to exaggerate the results of daylight access analysis of proposed development and could suggest that a development would perform better than is likely to be the case.

This has implications for the Commission's understanding of the likely daylight performance of the scheme within the meaning of relevant statutory guidelines, such as the *Compact Settlements Guidelines*.

Given this, we submit that the *Daylight and Sunlight Assessment* (dated December 2025) submitted with the planning application does not provide sufficient information on the daylight performance of the proposed scheme, within the meaning of relevant local and statutory planning policy, and does not provide a sufficient basis for An Coimisiún Pleanála to make a decision.

2.4 Significant Negative Impact on Existing Residential Amenity

2.4.1 Overbearing and Visual Impacts

The appeal site is situated in an established predominantly low-density, low-rise suburban neighbourhood. Residential development to the west, north and east/north-east of the appeal site is two-storey to two-storey, over basement, in character. A significant number of existing dwellings oppose the boundary and face directly into the appeal site. Significantly, in the portions of the appeal site bounding two-storey residential areas at Norwood Park, Cherryfield Avenues Lower and Upper and Sandford Road, the character of the existing appeal site is open and undeveloped, with bands of mature trees along the boundaries.

In relation specifically to Norwood Park, the LVIA at Chapter 9 of the EIAR also explains that "*Norwood Park has a high degree of visual exposure to the site*" (page 9-13) and also identifies Norwood Park in the list of receptors sensitive to visual change at page 9-47. The LVIA also highlights that there would be a "*significant difference in typology and scale across the boundary*" where the site interfaces with Norwood Park and Cherryfield Avenue.

As noted above, the application expressly states that the "*proposed development is deliberately a departure from the existing character of (part of) its immediate environs*" (EIAR page 9-50). Given this, it is submitted that the design and massing of the proposed development fails to integrate with the established built form in the vicinity. In particular, the excessive height (rising to eight storeys) and excessive width of the apartment blocks (e.g. 73 m in the case of the northern facade of Block C opposing Norwood Park) is likely to read as monolithic and overbearing in this low-rise neighbourhood. The proposed development will appear as an incongruous and obtrusive feature in views from surrounding residential estates and from major routes on Sandford Road and Milltown Road due to its excessive scale and failure to respond to the character of its surrounding context. This is likely to result in a significant loss of visual amenity for residents, but also for members of the wider visiting public.

The position is reinforced by the Development Plan's own treatment of overbearance. Section 15.9.18 of the Development Plan provides that "*in established residential developments, any significant changes to established context must be considered. Relocation or reduction in building bulk and height may be considered as measures to ameliorate overbearance.*" The proposal, by the Applicant's own description, represents a "*deliberate departure from the existing character*" of its

environs and (per Chapter 9 of the EIAR) gives rise to a *"significant difference in typology and scale"* across the boundary with Norwood Park and Cherryfield Avenue. The Development Plan therefore expressly contemplates that, on a proposal of this character, *"relocation or reduction in building bulk and height"* should be considered as measures to ameliorate overbearance. The Planner's Report does not engage with Section 15.9.18, and no reduction in bulk or height has been required of the Applicant in respect of those parts of the scheme that oppose the established two-storey neighbourhoods at Norwood Park and Cherryfield Avenue. We respectfully submit that, on a faithful application of Section 15.9.18, the bulk and height of Block C in particular – opposing the rear gardens of Norwood Park – should have been reduced prior to the issuing of a decision to grant.

2.4.2 Overlooking and Loss of Privacy

SPPR 1 of the *Compact Settlements Guidelines* outlines requirements in relation to separation distances and states that *"the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties"*. We submit that the Applicant has failed to demonstrate that the proposed development will protect the privacy of existing residences. To the contrary, we submit that the position of windows and balconies, in combination with the close proximity of the proposed apartment blocks (e.g. Blocks A1 and C) to existing dwellings and rear gardens at Norwood Park, must result in significant additional actual and perceived overlooking of existing dwellings surrounding the appeal site. This is also evident from the photomontages submitted with the application.

2.4.3 Traffic Hazard due to Insufficient and Inappropriate Car Parking Provision

The appeal site is located in Zone 3 within the meaning of Table 2 of Appendix 5 of the Development Plan, which provides for a maximum car parking standard of 1 space per dwelling for houses or apartments. This would equate to a maximum standard of 562 no. car parking spaces for the proposed development. The subject application proposes a provision of 279 no. car parking spaces to serve the residential element of the proposal or a reduced parking rate of 0.546 no. spaces per unit.

It is further noted that the *Compact Settlements Guidelines* recommend a maximum of 2 spaces per dwelling in intermediate locations. This would equate to a maximum allowable parking provision of 1,124 no. spaces. The subject application proposes less than 25% of the level of parking permissible in intermediate locations under the *Compact Settlements Guidelines*.

In seeking to justify the proposed level of parking provision, the *Parking Strategy* submitted with the application is misleading as to the proximity of the nearest Luas stop (which is not located within 1 km of any proposed residential unit). It is further noted that the data included in the *Parking Strategy* shows that a parking provision of approximately 0.7 no. spaces per unit is likely to be required based on CSO data for car ownership.

We submit that the significant under-provision of car-parking (0.546 no. spaces per unit) is a deficiency of the scheme associated with the level of overdevelopment now proposed. Having regard to the distance of the site from good quality public transport, the Applicant has failed to demonstrate that the range of travel needs of the future resident population can be met by the proposed development, which will negatively affect the quality of life for future occupants and amounts to a poor standard of residential amenity. It is submitted that the proposed car parking provision is inadequate to serve the needs of future residents of the development and would likely give rise to unacceptable levels of overspill and haphazard parking on adjacent roads such as Norwood Park and Cherryfield Avenue. This would inevitably endanger public safety by reason of traffic hazard and

obstruction of pedestrians, bus services and other road users, diminishing existing levels of residential amenity for neighbouring residents.

As an aside, we are informed by our client that during pre-application discussions with local residents, the developer had agreed not to place a vehicular entrance along Sandford Road. The residents have a particular concern about traffic conditions along this busy road. Indeed, the swept path analysis that was submitted as part of the planning application (dwg. No. 190226-X-04-Z00-DTM-DR-DBFL-CE-1205 - Rev 2) shows large vehicles travelling North West along Sanford Road having to swing far out into oncoming traffic in order to achieve a left-hand turn into the site. Armstrong Planning does not have in-house traffic engineering expertise, but we would ask the Commission to look carefully at the safety of this vehicular access opposite Belmont Avenue, and the implications for traffic and congestion on an already busy road.

2.4.4 Summary – Significant Negative Impact on Residential Amenity

In summary, due to its excessive height, scale, bulk and density in the context of the low-density, low-rise neighbourhoods of Norwood Park and Cherryfield Avenue, the proposal will result in significant negative impacts on the residential amenity of existing neighbouring residential lands incurring impacts such as loss of visual amenity and overbearance, loss of privacy and traffic hazard due to likely overspill parking. The proposed development is, therefore, considered to be contrary to the provisions of the Development Plan and statutory guidance for sustainable residential development and should be refused permission.

3. CONCLUSION

In conclusion, we respectfully submit that the subject application proposes a level of development considerably in excess of that recommended by the *Compact Settlements Guidelines* and *Building Height Guidelines* for a suburban site in an intermediate, 'City – Suburban/Urban Extension' location, particularly given the 'Z12' Zoning Objective of the site which seeks to "to safeguard the essential open character" of institutional lands.

The over-development and over-densification of this suburban site will result in a congested form of development and will not be in keeping with the proper planning and sustainable development of the area. The proposal will result in negative impacts on existing residential amenity due to loss of visual amenity and overbearance, overlooking and traffic hazard and is, therefore, inconsistent with the proper planning and sustainable development of the area and should be refused permission.

Prepared by,

DAVID ARMSTRONG BA MRUP MIPI MRTPI

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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 Coimisiún Pleanála in relation to this development

PLAN NO.
DATE RECEIVED:
LOCATION :
PROPOSAL :

WEBLRD6093/26-S3B

25-Feb-2026

Milltown Park, Sandford Road, Dublin 6, D06V9K7

Sandford Living Limited intend to apply for permission for a Large-Scale Residential Development at a c. 4.26 hectare site at Milltown Park, Sandford Road, Dublin 6, D06 V9K7. Works are also proposed on Milltown Road and Sandford Road to facilitate access to the development including improvements to pedestrian facilities on an area of c. 0.16 hectares. The development's surface water drainage network shall discharge from the site via a proposed 300mm diameter pipe along Milltown Road through the junction of Milltown Road / Sandford Road prior to outfalling to the existing drainage network on Eglinton Road (approximately 200 metres from the Sandford Road / Eglinton Road junction), with these works incorporating an area of c. 0.32 hectares. The development site area, road works and drainage works areas will provide a total application site area of c. 4.74 hectares.

The development will principally consist of: the demolition of c. 4, 847.5 sq m of existing structures on site including Milltown Park House (880 sq m), Milltown Park House Rear Extension (2, 031 sq m), the Finlay Wing (622 sq m), the Archive (1, 240 sq m) and the Link Building between Tabor House and Milltown Park House Rear Extension to the front of the Chapel (74.5 sq m); the refurbishment and reuse of Tabor House (1, 575 sq m) and the Chapel (768 sq m) and the provision of a single storey glass entrance lobby to the front and side of the Chapel (52 sq m); and the provision of 562 No. residential units comprising 6 No. three-bed courtyard houses and 556 No. apartment units (70 No. studios, 176 No. one-bed units, 267 No. two-bed units and 43 No. three-bed units). Block A1 will range in height from 5 No. storeys to 8 No. storeys and will comprise 81 No. apartment units; Block A2 will range in height from 6 No. storeys to 8 No. storeys and will comprise 139 No. apartment

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units; Block B will range in height from 3 No. to 7 No. storeys and will comprise 74 No. apartment units; Block C will range in height from 4 No. storeys to 7 No. storeys and will comprise 151 No. apartment units; Block D will range in height from 3 No. storeys to 5 No. storeys and will comprise 30 No. apartment units; Block E will be 2 No. storeys in height and will comprise 6 No. courtyard type houses; and Block F will range in height from 5 No. storeys to 7 No. storeys and will comprise 81 No. apartment units.

The development also includes the provision of: cultural/community space within Tabor House (4 No. storeys including lower ground floor level) and the Chapel (2 No. storeys including lower ground floor level and mezzanine level) (1, 698 sq m) with associated outdoor space (248 sq m); a café/restaurant (179 sq m) and a creche (375 sq m) within Block F with associated outdoor creche play area; ancillary residents' amenities and facilities (324 sq m) within Blocks B & C; and a single storey bin store and substation adjacent to Block F (101 sq m).

The development also provides a new access from Milltown Road (which will be the principal vehicular entrance to the site) in addition to utilising and upgrading the existing access from Sandford Road as a secondary access principally for deliveries, emergencies and taxis; new pedestrian access points; pedestrian/bicycle connections through the site; 319 No. car parking spaces (288 No. at basement level and 31 No. at surface level); set down area for deliveries; bicycle parking; 22 No. motorcycle spaces; bin storage; boundary treatments; private balconies and terraces facing all directions; hard and soft landscaping including public open space and communal open space; green/blue roofs; PV panels; substations; lighting; plant; lift cores and overruns; and all other associated site works above and below ground.

The proposed development has a gross floor space of c.50, 196 sq m above ground level over a partial basement (under part of Blocks A1 and A2 and under Blocks B and C) measuring c. 10, 550 sq m, which includes parking spaces, bin storage, bike storage and plant.

An Environmental Impact Assessment Report has been prepared in respect of the proposed development. The planning application together with the Environmental Impact Assessment Report may be inspected or purchased at a fee not exceeding the reasonable cost of making a copy, at the offices of Dublin City Council, Planning Department, Block 4, Ground Floor, Civic Offices, Wood Quay, Dublin 8 during its public opening hours (9.00a.m.- 4.30p.m.). The Planning Application may also be inspected online at the following website set up by the applicant: www.sandfordplanninglrd2.ie. A submission or observation in relation to the application may be

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made in writing to the planning authority on payment of the prescribed fee (€20.00) within the period of 5 weeks beginning on the date of receipt by the authority of the application, and such submissions or observations will be considered by the planning authority in making a decision on the application. The planning authority may grant permission subject to or without conditions, or may refuse to grant permission.

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.

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

An Roinn Pleanála & Forbairt Maoine, Bloc 4, Urlár 3,
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For ADMINISTRATIVE OFFICER