

3 Planning Context

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3.1 Introduction

No revisions were necessary to this EIAR chapter in responding to Dún Laoghaire - Rathdown County Council (DLR CC) decision to request Further Information dated 25th March 2026 in respect of LRD26A/0051/WEB.

This chapter has been prepared to consider the relevant planning policies that relate to the development site, the wider Dún Laoghaire-Rathdown County and National development objectives. It considers strategic and local level plans relevant to the subject development and a review of the national and regional policy context inclusive of local statutory plans in place to govern the sustainable development of Blackrock.

The following relevant planning documents were considered by the project design team during the planning process:

- Strategic Planning Policy Documents:
 - National Planning Framework – Project Ireland 2040
 - Delivering Homes, Building Communities 2025-2030
 - Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031
 - Transport Strategy for the Greater Dublin Area 2016-2035
- Ministerial Guidelines
 - Guidelines for Planning authorities on Childcare Facilities (2001)
 - Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024)
 - Urban Development and Building Height Guidelines (2018)
 - Sustainable Housing: Design Standard for New Apartments (2025)
 - NPF Implementation Guidelines (2025)

Furthermore, following documents are acknowledged and compliance with them is addressed as listed:

- The Planning System and Flood Risk Management (2009) – addressed in the Flood Risk Assessment prepared by JBA and Chapter 8
- Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities (2009) – addressed in the Appropriate Assessment Screening Report prepared by DNV and Chapter 6.
- Design Manual for Urban Roads and Streets 2019 – addressed in the Design Manual for Urban Roads and Streets Compliance Statement prepared by NRB and Chapter 14.
- Statutory Planning Document
 - Dún Laoghaire Rathdown County Development Plan 2022-2028

It is considered that the proposed development is consistent with the objectives and visions for sustainable development as set out in the above planning policy documents. The proposal delivers strategically located large scale residential development on lands at 'St. Teresa's', Temple Hill, Temple Road, Monkstown, Blackrock, Co. Dublin.

3.1.1 Expertise

The applicant, Oval Target Ltd., appointed Brock McClure Planning and Development Consultants to direct and co-ordinate the preparation of this chapter for the EIAR. This chapter of EIAR has been prepared by Katarina Kanevova, who completed her Master's Degree in Spatial Planning at Slovak University of Technology in Bratislava, Slovakia in 2010. Following her studies she worked in forward planning, specialised on land-use planning projects in Slovakia. Katarina is a Corporate Member of the Irish Planning Institute.

This chapter has been reviewed by Linda McEllin, Associate Director at Brock McClure Planning & Development Consultants. Linda has worked at Brock McClure for 11 years and has over 18 years' experience in the private planning sector. Linda has focused her expertise in the areas of Large

Scale Residential Developments. Linda has a Master's Degree in Regional and Urban Planning from University College Dublin. Linda is a Corporate Member of the Irish Planning Institute.

3.2 Strategic Planning Policy Documents

3.2.1 National Planning Framework – Project Ireland 2040

Project Ireland 2040

National Planning Framework First Revision

April 2025

The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040. The NPF was originally published in 2018, and replaced the National Spatial Strategy as the overall spatial planning and development strategy for Ireland. Planning legislation provides for the Government to revise or replace the NPF every six years. Following a decision of Government in June 2023, the preparation of a revised National Planning Framework commenced, with a draft revision being displayed in July 2024. Based on feedback from the consultation, an updated version of the draft revised NPF was then published in November 2024.

Following such, on the 8th of April 2025, the Government approved the Revised National Planning Framework which, subject to the approval of both Houses of the Oireachtas, signals the conclusion of the NPF revision process, which has been underway since June 2023 and is detailed below.

The NPF has been updated to address evolving challenges and needs, including population growth, housing demands, infrastructure requirements, and climate change for example.

The Framework focuses on:

- Growing our regions, their cities, towns and villages and rural fabric.
- Building more accessible urban centres of scale.
- Better outcomes for communities and the environment, through more effective and coordinated planning, investment, and delivery.

As a strategic development framework, this Plan sets out the long-term context for the Country's physical development and associated progress in economic, social, and environmental terms and in an island, European and global context. Ireland 2040 will be followed and underpinned by supporting policies and actions at sectoral, regional, and local levels.

The key high - level objectives of the Plan are:

- To continue a path of economic, environmental, and social progress that will improve our prosperity, sustainability and well - being.
- To ensure that Irelands many unique assets can be built upon, with an emphasis on improving economic output and stability as well as quality of life, environmental performances and the liveability of Dublin, our cities, towns, and rural areas.
- To set out likely future change in Ireland and the spatial pattern required for effective and co-ordinated investment in a range of sectors to best accommodates and support that change.
- To put in place a strategy for the sustainable development of places in Ireland and how that can be achieved through planning, investment, and implementation.

The NPF sets out that the Eastern and Midlands region will, by 2040, be a Region of around 3 million people, at least half a million more than today. It is identified that the region's most significant place-making challenge will be to plan and deliver future development in a way that enhances and reinforces its urban and rural structure and moves more towards self-sustaining, rather than commuter driven activity, therefore allowing its various city, metropolitan, town, village and rural components to play to their strengths, while above all, moving away from a sprawl-led development model.

The national planning framework also promotes the creation of mixed tenure communities by stating *"more home and more affordable homes must be provided in our urban areas as part of the creation of mixed-tenure communities."*

The NPF recommends the following in relation to compact urban development *"At a metropolitan scale, this will require focus on a number of large regeneration and redevelopment projects within the existing built up footprint, and a more compact urban form, facilitated through well-designed higher density development."*

It is also apparent from the NPF that low-density housing development, and underused sites, have been a feature of Ireland's housing landscape in cities, towns, and the open countryside. To avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in the urban areas.

The sites zoning allows for residential development and is considered appropriately serviced with appropriate infrastructure to deliver on a sustainable form of development.

It is submitted that the current proposal for 192 no. new residential units and a childcare facility will deliver on the above objectives of the NPF. We note specifically that the addition of a wide range of unit typologies is appropriate at this highly accessible site, catering to a wide demographic of potential future residents.

The following policies are considered key in the context of this site:

National Policy Objective 3 -

Eastern and Midland Region: 470,000 additional people between 2022 and 2040 (c. 690,000 additional people over 2016-2040) i.e. a population of almost 3 million.

National Policy Objective 7 -

Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.

National Policy Objective 8 –

Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.

National Policy Objective 14 -

Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity, enhanced levels of amenity and design and placemaking quality, in order to sustainably influence and support their surrounding area to ensure progress toward national achievement of the UN Sustainable Development Goals

National Policy Objective 20 -

In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns, and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

National Policy Objective 22 -

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.

National Policy Objective 41 -

Prioritise the alignment of targeted and planned population and employment growth with investment in:

- *A childcare/ECCE planning function, for monitoring, analysis and forecasting of investment needs, including identification of regional priorities;*
- *The provision and timely delivery of childcare facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, including in support of infill and brownfield development, that meet the diverse needs of local populations and act as a key enabler for housing development, thereby contributing to the development of sustainable communities;*
- *The expansion and consolidation of Further and Higher Education facilities, particularly where this will contribute to wider regional development, and*
- *Programmes for life-long learning, especially in areas of higher education and further education and training where skills gaps are identified.*

National Policy Objective 42 -

To target the delivery of housing to accommodate approximately 50,000 additional households per annum to 2040.

National Policy Objective 43 -

Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

National Policy Objective 44 –

Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.

National Policy Objective 45

Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development.

It is submitted that the current proposal for 414 no. new residential units, childcare facility and café will deliver on the above objectives of the NPF. We note specifically that the addition of a wide range of unit typologies and affordable and social housing options is appropriate at this highly accessible site, will cater to a wide demographic of potential residents.

3.2.2 National Development Plan Review 2025

National Development Plan Review 2025



RECEIVED: 29/05/2026

On 22 July 2025, the Government published the updated National Development Plan (NDP), with unprecedented levels of investment, to secure Ireland's future, unlock housing, upgrade water and energy infrastructure, deliver more roads, and provide better public transport.

The plan sets out:

- Total investment of €275.4 billion over the period 2026 to 2035;
- Sectoral capital allocations of €102.4 billion for the years 2026 to 2030; and
- A further €100 billion for 2030 to 2035

The review includes an additional €34 billion relative to the previous 2021-2030 NDP including equity funding of €10 billion to 2030 to fund large strategic projects in energy, water and transport.

This is the largest ever capital investment plan in the history of the State and will enable the delivery of thousands of new homes, provide more childcare and school places, invest in children's disability services and ensure better healthcare for all.

Investment decisions have been guided by the critical priorities for the Review – to improve our infrastructure, particularly water, energy and transport. Improvements to these critical sectors of economic infrastructure have been prioritised to support the core ambition of the review – to deliver 300,000 additional homes by 2030 and boost our competitiveness.

A significant driver of the need for capital investment is the ongoing population growth and demographic change in Ireland. Based on the CSO's most recent population projections, over the remainder of the decade, the population is projected to increase to between 5.60 and 5.76 million people with continuing changes in demographics trends, similar to recent years.

The proposed development, which provides for 414 no. residential units, out of which 41 units are social and affordable residential apartment units within Part V. In addition, a childcare facility providing 64 no. child spaces is proposed. Therefore, it is submitted that the project is fully aligned with the overarching objectives and investment priorities of the National Development Plan Review, 2025. By delivering much-needed housing on underutilised urban lands, the project supports the NDP's core ambition to deliver 300,000 additional homes by 2030, while also contributing to the compact growth and sustainable urban regeneration policies outlined in national and regional planning frameworks.

3.2.3 Delivering Homes Building Communities 2025-2030



RECEIVED: 29/05/2026

The action plan for housing and homelessness recognises that a significant increase in new homes is required. The action plan outlines a 2 pillar approach as follows:

Pillar 1 – Activating Supply

- Activating Land, Delivery Infrastructure
- Facilitating Investment, Addressing Viability
- Increasing Skills, Adopting Modern Methods of Construction.
- Securing Additional Supply

Pillar 2 – Supporting People

- Focusing on Ending Homelessness, Delivering Homes for Older People, Supporting Social Inclusion

The plan focuses on activating the supply of “300,000 homes. This will be achieved through activating more land, providing more housing-related infrastructure, securing more development finance for home building, addressing viability challenges particularly those seen in apartment delivery, increasing the adoption of Modern Methods of Construction, increasing the skills in the residential construction sector and working toward ending dereliction and vacancy”

The plan repeatedly states the need for housing to improve the well-being of the population as it states “Delivering Homes, Building Communities emphasises the importance of green spaces, walkable communities, and mixed tenure developments that will cater for everybody at every stage of their lives. The approach focuses on creating resilient homes and infrastructure minimising the carbon footprint and promoting efficient resource use. This enables communities to flourish and maintain their identity while adapting to the needs of a changing world.”

The proposed development supports Pillar 1 and 2 of the plan specifically by way of the delivery of 414 no. residential apartment units at a key location adjacent to services and amenities. The site has the benefit of accessibility to public transport services and is considered a significant opportunity site for the delivery of residential units.

We submit that the proposed development of 414 no. residential units at a high capacity public transport node is consistent with the Action Plan for Housing and Homelessness.

3.2.4 Regional Spatial & Economic Strategy for the Eastern and Midland Region 2019-2031



The *Regional Spatial and Economic Strategy for Eastern and Midland Regional Assembly (RSES)* was published and adopted in 2019. This Strategy provides the policy framework to manage spatial planning and economic development in the Region. The document consists of the following:

- **Spatial Strategy** – to manage future growth and ensure the creation of healthy and attractive places to live, work, study, visit and invest in.
- **Economic Strategy** – that builds on our strengths to sustain a strong economy and support the creation of quality jobs that ensure a good living standard for all.
- **Metropolitan Plan** – to ensure a supply of strategic development areas for the sustainable growth and continued success and competitiveness of the Dublin metropolitan area.
- **Investment Framework** – to prioritise the delivery of key enabling infrastructure and services by government and state agencies.
- **Climate Action Strategy** – to accelerate climate action, ensure a clean and healthy environment and to promote sustainable transport and strategic green infrastructure.

The site is identified as being located in the 'Dublin City and Suburbs' and is part of the Dublin Metropolitan Area.

The Dublin Metropolitan Area Strategy Plan (MASP) in Chapter 5 of the RSES identifies a number of large – scale strategic residential and economic development areas, that will deliver significant development in an integrated and sustainable manner in the metropolitan area. The requirement for the preparation of MASP was set out in Project Ireland 2040 - National Planning Framework. MASP provides for a 12-20 year strategic planning and investment framework for the Dublin Metropolitan area.

The following Housing and Regeneration Policy Objectives are considered relevant to the current proposal:

MASP Housing and Regeneration

“RPO 5.4: Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for New Apartments Guidelines and 'Urban Development and Building Heights Guidelines for Planning Authorities.”

“RPO 5.5: Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on **the consolidation of Dublin and suburbs**, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.”

Aside from the above core policy objectives, it is clear that 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 and regeneration. It is set out that there is an opportunity to promote and improve the provision of public transport and active travel and the development of strategic amenities to provide for sustainable communities.

In terms of consolidation and re-intensification, the following policy objective is noted:

Consolidation and Re-Intensification

“RPO 4.3: Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.”

We submit that the proposal complies with the RSES as it will deliver the appropriate residential density of 199 units per ha having regards to the '2024 Sustainable Residential Development and Compact Settlements Guidelines (2024)', '2020 Sustainable Urban Housing - Design Standards for New Apartments' and '2018 Urban Development and Building Heights Guidelines for Planning Authorities'. The proposal site is ideally placed to provide the consolidation of Dublin city and suburbs with adequate supporting infrastructure to support the intensification of this brownfield site.

Having reviewed the key policies of the recently adopted RSES document, we are of the view that the current proposal complies with the spirit and intent of RSES for the following reasons:

- The development proposal delivers an appropriate level of residential density at 119 units per ha and has had regard specifically to *standards as set out in the 'Sustainable Residential Development and Compact Settlements Guidelines (2024)', the 'Sustainable Urban Housing - Design Standards for New Apartments Guidelines for planning Authorities (2025)' and 'Urban Development and Building Heights Guidelines for Planning Authorities (2018)'* in ascertaining an appropriate residential density, height, and car parking provision for the site.
- The current proposal delivers a consolidated approach to development in that it maximises on height, delivers an appropriate site coverage and residential density along a key public transport corridor and in a proximity to a high capacity public transport node.
- The proposal utilises a prime urban neighbourhood site within the metropolitan area of Dublin. The delivery of residential development at this location is considered appropriate to this built up area of Dublin.

We submit that the proposal is consistent with the Regional Spatial and Economic Strategy for the Eastern & Midland Region.

3.3 Section 28 Ministerial Guidelines

The sections below examine the following key Section 28 Ministerial Guidance that will shape the development of the site in terms of height, apartment standards and compact settlement:

- Sustainable and Compact Settlement Guidelines for Planning Authorities (2024)
- Planning Design Standards for Apartments: Guidelines for Planning Authorities (2025)
- Urban Development and Building height Guidelines (2018)
- Guidelines for Planning Authorities on Childcare Facilities (2001)
- Part V of the Planning and Development Act 2000: Guidelines (2017)
- Appropriate Assessment of Plan and Projects in Ireland Guidance (2009)
- NPF Implementation: Housing Growth Requirements (2025)

3.3.1 Sustainable Residential Development and Compact Settlements Guidelines, 2024



The Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024) referred to as the 2024 Guidelines from herewith in this report, set out policy and guidance in relation to the planning and development of urban and rural settlements with a focus on residential development and the creation of compact sustainable settlements.

These 2024 Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities published in 2009 and provide updated guidance to take account of current policy and economic, social and environmental considerations. There is a renewed focus in the 2024 Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality design and placemaking to support sustainable and compact growth.

Given the NPF priorities for compact growth and reflecting the variety of settlements and settlement contexts where residential development takes place. The Government considers that it is necessary to expand on the number of density bands contained in the 2009 Guidelines to ensure that densities are efficient while, at the same time, tailored to the settlement context.

Section 3.3 identifies settlements, area types and density ranges for cities and metropolitan (MASP) areas. It's noted that the strategy for all cities is to support consolidation and intensification within and close to the existing built-up footprint of the city and suburbs area and metropolitan towns; and to support sustainable urban extension at locations served by public transport.

The following sets out the key development parameters, as they relate to the site:

POLICY AND OBJECTIVE 3.1 (AREAS & DENSITY RANGES)

Policy and Objective 3.1 *"It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4."*

Policy Objective 3.1. of the 2024 Guidelines adopts a 2-step approach to density, that being Step 1 - the application of an appropriate range followed by Step 2 - a requirement to refine the density in terms of site's accessibility and considerations in relation to local character amenity and the natural environment.

Table 3.1 of the 2024 Guidelines clearly set out density ranges for Dublin City and Suburbs. The ranges are broken down into City Centre; City Urban Neighbourhoods; City Suburban/Urban Extension. In terms of categorisation, we note that the site is located within City-Urban Neighbourhood Category. This site is also a centrally located and accessible urban site in the wider city context. On this basis, it would be our view that the site is considered to be most akin to the City Centre range, which is defined 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.”

The 2024 Guidelines state that for city centre sites, it is a policy and objective of the Guidelines (Policy and Objective 3.1 refers) that residential densities in the range of **50-250 DPH** shall be generally applied to this site.

In relation to density, Section 3.3.6. further states that there is a presumption in these 2024 Guidelines against very high densities that exceed 300 dph (net) on a piecemeal basis. Densities that exceed 300 dph (net) are open for consideration on a plan-led basis only and where the opportunity for densities and building heights that are greater than prevailing densities and building height is identified in a relevant statutory plan.

Consideration of Proximity and Accessibility to Services

Within Step 1 of Refining Density the accessibility of the site has been evaluated.

We note the site is within close proximity and accessibility to high capacity public transport nodes with the presence of the DART (Blackrock DART station and Seapoint DART station are between 550–700m distance). The definition for a ‘High Capacity Public Transport Node or Interchange’ is outlined in Table 3.8 of guidelines as follows:

“High Capacity Public Transport Node or Interchange:

- 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.
- Highest densities should be applied at the node or interchange and decrease with distance.
- ‘Planned public transport’ in these Guidelines refers to transport infrastructure and services identified in a Metropolitan area Transport Strategy for the five cities where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for public transport.

[BMC Emphasis]

We can confirm that the subject site meets the criteria above as Blackrock DART station and Seapoint DART station are between 550–700m distance from the site that provides an efficient and high capacity service at this location to and from Dublin City Centre. The site is intensively serviced by public transport and the N31 is designated as a proposed Quality Bus Corridor (QBC). The site is also within close proximity to local employment centres in Blackrock and Monkstown.

Within the context of the Public Transport Accessibility Level (PTAL) tool. The site is identified as having a medium - high level of service as follows:

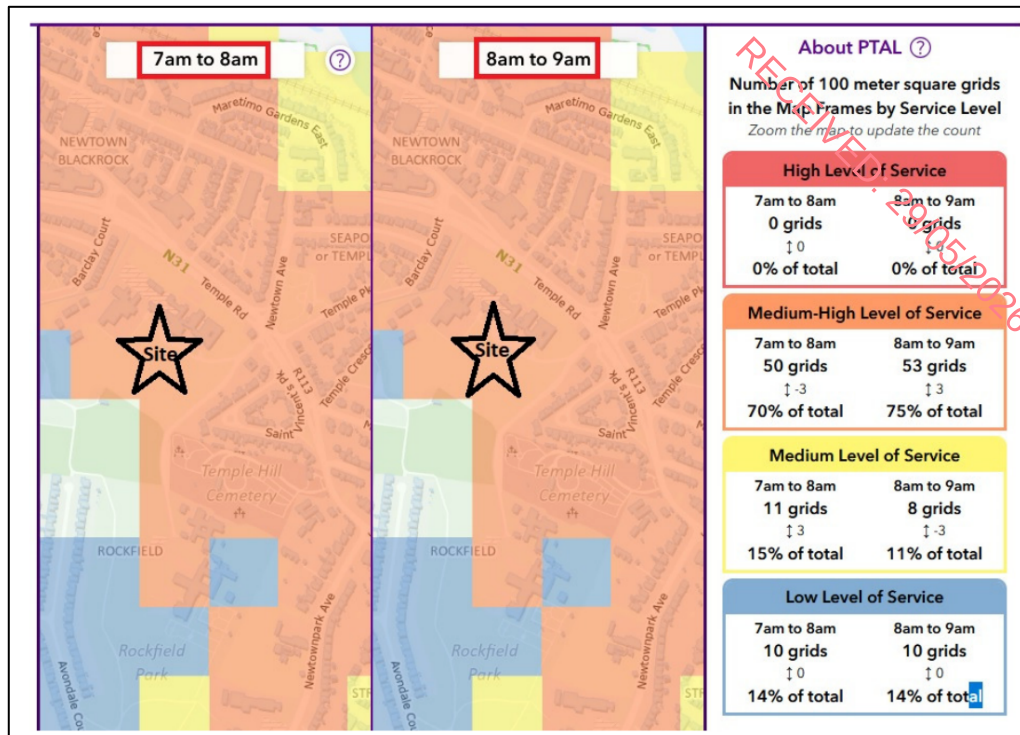


Figure 3.1 – PTAL Categorisation

Step 2

These guidelines note that within Step 2 of refining density new developments should respond to the receiving environment in a positive way and should not result in a significant negative impact on the character including historic character, amenity or the natural environment.

Proposed heights have a regard to the existing surrounding context of the subject site, namely mature residential development to the East (St. Vincent's Park) and the Alzheimer's Society of Ireland and existing residential development (St. Louise's Park and Barclay Court) to the West.

Special consideration was given to protected structures on the subject site:

- 'St. Teresa's House' or Centre which is a 3 storey Victorian House; RPS Reference 398
- 'St. Teresa's Lodge' known as 'The Gate Lodge', which is a single storey property located at the main entrance to the site off Temple Hill; RPS Reference 1960 and
- Entrance Gates along the north of the site, RPS Reference 398

Objective 'INST': 'To protect and/or provide for Institutional Use in open lands' in relations to Alzheimer Society of Ireland is noted. The Development Plan sets out that a minimum public open space provision of 25% of the total site area will be required for such sites.

As such, the subject site is responsive and mindful of its existing context whilst also striking a balance at introducing a higher density and taller development to establish its own, slightly higher density context.

As such, it is our professional planning opinion that the proposed residential density of 119 dph is most appropriate for the subject site.

Density Calculation

Appendix B of the Guidelines, sets out a methodology for measuring net site area and density for mixed use development. Based on Appendix B the net site area for this site is identified as 0.447ha as per the figure below.

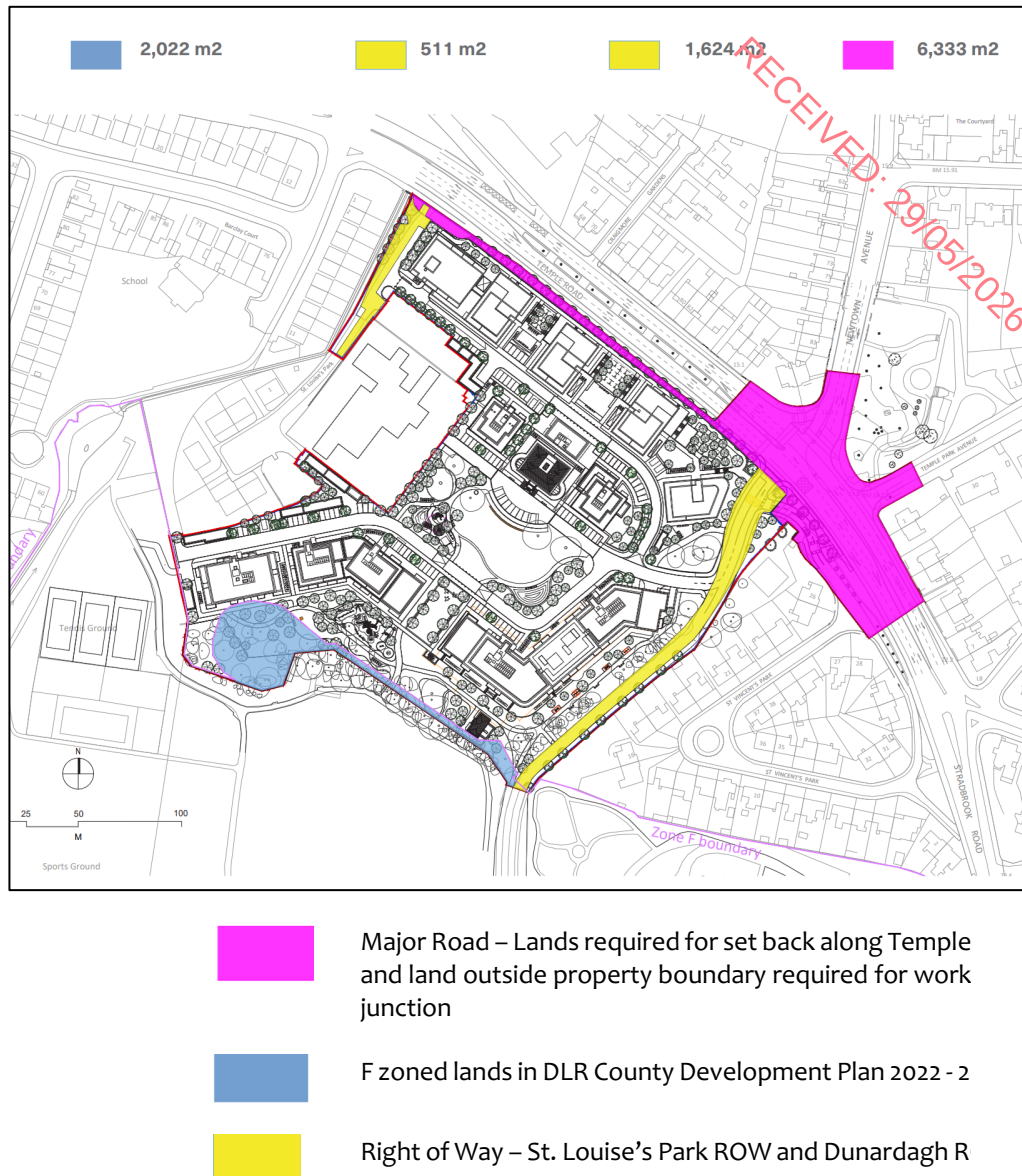


Figure 3.2 – Net Developable Area

Subsequently, density has been calculated as follows, which aligns with the requirements of Appendix B of the Guidelines:

- Red line boundary area 45,631 sqm (4.56ha)

The net site area excludes :

- Areas required for major roads (Temple Road frontage and full extent of junction)
- ROW/Wayleaves (St Louise's Park and ASI access and Dunardagh access.)
- Land in zoning objective F.

The sum of the areas to be excluded is 10,490 m2

The net site area is : $45,631 - 10,490 = 35,141$ m2

- Net site area = 35,141 sqm
- Overall GFA = 46,535.6 m2
- Residential GFA = 46,067.2 m2
- Non-residential GFA = 468.4 m2 (creche and café)
- Number of residential units = 414 units

Calculation:

Residential GFA as a portion of development = 99%

Site area for density purposes (net site area x 99%) = 3.48 ha

Residential density = $414 / 3.48 = 119.0$ dph (net)

The current proposal delivers a residential density of 119 units per ha (based on a full development site area of 4.56 ha and development proposal of approx. 414 units), which aligns with the requirements outlined above and falls well within a range of 50-250 uph designated for this category of location. This is considered an appropriate approach to development given the proximity of the site between 2 DART stations.

Specific Planning Requirements (SPPRs)

Section 5.3 of the Guidelines also include a number of Specific Planning Policy Requirements (SPPRs) that should be considered in the context of the future development of the subject site. SPPRs 1, 3, 4, and Policy & objective 5.3.3 are considered relevant to the site and the key requirements for same are set out below:

SPPR 1 - Separation Distances

Provision is made under SPPR 1 for minimum separation distances of 16m between opposing windows serving habitable rooms at the rear side of houses, duplex units and apartment units above ground floor level. It is stated that separation distances below 16m may be considered in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.

Applicants Response

The current scheme provides adequate min separation from opposing windows as follows:

Block C1 – St. Teresa's House	11.5 m
Block C2 – St. Teresa's House	11.5 m
Block D1 – Block E1	25.6 m
Block E1 – Block E2	8 m*

* Secondary windows in Block E1 west gable are provided with opaque glass to avoid direct overlooking on typical floors.

SPPR 3 - Car Parking

This SPPR makes clear provision for the level of car parking at 'City Urban Neighbourhoods (including Designated Town Centre and Public Transport Nodes and Interchanges)' such as the subject site. It is noted specifically that car parking should be minimised, substantially reduced or wholly eliminated in the urban neighbourhoods of Dublin City. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, should be 1 no. space per dwelling.

Applicant's Response

We note that the proposal delivers at total of 244 no. car parking spaces. This delivers a proposed car parking ratio of 0.59 and includes 5% Disability Access Car Space. This approach is considered appropriate given the sites proximity to public transport. This car parking ratio is considered appropriate and is supported in this context for the following reasons:

The subject site is located within 700m of Blackrock DART Station and 550 m from Seapoint DART Station and is therefore within the 10-minute walking distance specified by DHPLG for 'Central and/or Accessible Urban Locations'.

It is noted that the local roads authority has been receptive to lowering residential car parking standards in the general area of the subject site and a series of high density residential schemes have been approved with considerable reductions in car parking.

We note that the following Section 28 Ministerial Guidelines refer to a reduced parking provision where possible:

Section 4.20 of the Sustainable Urban Housing: Design Standards for New Apartments Guidance for Planning Authorities

Sustainable Residential Development and Compact Settlement Guidelines (2024), specifically SPPR 3.

SPPR 4 – Cycle Parking and Storage

This SPPR requires a general minimum standard of 1 cycle storage space per bedroom. This SPPR references that visitor parking should also be provided but no specific quantum is referenced. There is provision made for deviation from these standards, but this requires justification in terms of location, quality of facilities proposed, flexibility for future enhancement. Provision is also required for cargo and electric bikes and for individual lockers. This SPPR also sets out design requirements for cycle facilities.

Applicant's Response

The proposal provides 962 no. cycle parking spaces, with a provision of 739 long term spaces, 209 no. short term spaces for residential units. This proposal accords with the above requirements.

3.3.2 Design Standards for New Apartments



‘Sustainable Urban Housing: Design Standards for New Apartments 2023’ are intended to promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term.

It is noted that ‘Sustainable Urban Housing: Design Standards for New Apartments 2025’ were published in July 2025, however, they are currently under juridical review. While 2023 guidelines remain in place, we are assessing a compliance of the proposed development with both, 2023 and 2025 guidelines for clarity.

In this regard, it is noted that the proposed development safeguards higher standards.

The current proposal provides for 414 no. residential units, and this Chapter sets out the compliance of the proposal with the key policy requirements and standards as they relate to the proposed apartment units within the scheme as follows:

Specific Planning Policy Requirement 1 (2025)

(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.

Applicant Response to SPPR1

The proposed mix of units in the amended blocks is as follows:

- 8 x studio units (3.2%)
- 56 x 1-beds (22.2%)
- 10 x 2-bed (3p) (4%)
- 114 x 2-bed (4p) (45.2%)
- 64 x 3-beds (25.4%)

The overall proposed mix provides for 414 no. units is as follows:

- 8 x studio (1.93%)
- 164 x 1-beds (39.61%)
- 10 x 2-bed (3p) (2.42%)
- 149 x 2-bed (4p) (35.99%)
- 83 x 3-beds (20.05%)

We submit the proposal is in compliance with the above SPPR. We note that a Statement of Housing Mix Report with a detailed overview and examination of the demographic profile of the area within 10 minutes walking distance from the subject site forms a part of this application.

Specific Planning Policy Requirement 2 (2025)

“Minimum Apartment Floor Areas (Studio apartment (1 person) 32 sq.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) and 3-bedroom apartment (5 persons) 90 sq.m).”

Applicant's Response to SPPR2

We refer the Planning Authority to the accompanying Housing Quality Assessment prepared by O'Mahony Pike Architects which provide confirmation that the proposed development is consistent with the design standards of these Apartment Guidelines.

In addition, we note that the proposed development has 57.1% of apartments which are 10% oversized.

Specific Planning Policy Requirement 3 (2025)

“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.”

Applicant's Response to SPPR3

The current proposal delivers 58.7% dual aspect units. Given this, the proposed development complies with the dual aspect ratio required of the Apartment Guidelines.

Specific Planning Policy Requirements 4 (2025)

“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.”

Applicant's Response to SPP4

We can confirm that the ground floor of the proposed scheme provides floor to ceiling heights of 2.7 no. metres in compliance with the above policy requirements.

Specific Planning Policy Requirements 6 (2025)

“The provision of new Communal, Community and Cultural facilities within apartment schemes shall only be required in specific locations identified within the development plan and shall not be required on a blanket threshold-based approach in individual apartment schemes.”

Applicant's Response

The Development Plan does not identify any specific locations within the city or settlement hierarchy where communal, community, or cultural facilities are required to be provided as part of apartment schemes. As such, the requirement for these facilities does not apply to the subject site under the terms of the Plan.

Notwithstanding this, the proposed development includes the provision of a childcare facility at ground floor level within Block C2, with an associated secure outdoor play area. This facility will serve the needs of future residents as well as the surrounding community and represents a significant contribution to local social infrastructure.

Furthermore, a residential amenity space (451 sqm) is provided in Block C3 and a new café is proposed of 67.4 sq m.

Internal Storage

Unit Type	Min. Storage Requirements
studio	3 sqm
1-bed	3 sqm
2-bed (3 person)	5 sqm
2-bed (4 persons)	6 sqm
3-bed	9 sqm

Table 3.1 - Storage Requirement and Provision

We submit that compliance with the minimum required areas for internal storage space is achieved in all units. We refer the Planning Authority to the accompanying Housing Quality Assessment prepared by O'Mahony Pike Architects for further information in this regard.

Private Amenity Space

The proposed development complies with the requirements set down in respect of private open space in the guidelines. All of the units besides 3 no. units are provided with amenity private open space comfortably in accordance with the minimum requirements, as shown in the Housing Quality Assessment prepared by O'Mahony Pike Architects.

Unit Type	Min. Private Open Space Req.
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studio	4 sqm
1-bed	5 sqm
2-bed (3 person)	6 sqm
2-bed (4 persons)	7 sqm
3-bed	9 sqm

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Table 3.2 - Private Amenity Space Requirement and Provision

We refer the Planning Authority to the accompanying Housing Quality Assessment prepared by O'Mahony Pike Architects for further information in this regard.

Communal Amenity Space

Unit Type	Minimum Area per	Requirement
studio	4 sqm	8 x 4 sqm = 32 sqm
1-bed	5 sqm	164 x 5 sqm = 820 sqm
2-bed (3 person)	6 sqm	10 x 6 sq m = 60 sqm
2-bed (4 persons)	7 sqm	149 x 7 sqm = 1,043 sqm
3-bed	9 sqm	83 x 9 sqm = 747 sqm
Total		2,702 sqm

Table 3.3 - Communal Amenity Space Requirement and Provision

The current proposal exceeds the minimum requirement of 2,702 sqm and provides for a total of 3,620 sqm of outdoor communal amenity space.

Car Parking

The guidance offered by Planning Design Standards for Apartments is to minimise, substantially reduce or wholly eliminate car parking at locations that have good access to urban services and to public transport.

The Guidelines refer to car parking standards set out in the Sustainable Residential Development and Compact Settlements Guidelines. Compliance with these guidelines is set out in above.

3.3.3 Urban Development and Building Height Guidelines (2018)



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The publication of the **'Urban Development and Building Heights, Guidelines for Planning Authorities (2018)'** from hereon in referred to as the Building Height Guidelines 2018 is intended to set out national planning policy guidelines on building heights in relation to urban areas. These guidelines are the most recent form of guidance from the Minister on the matter of building height and were formally adopted in December of 2018. We note that section 1.14 of the document sets out the following:

*"Accordingly, where SPPRs are stated in this document, **they take precedence over any conflicting, policies and objectives of development plans, local area plans and strategic development zone planning schemes.** Where such conflicts arise, such plans/ schemes need to be amended by the relevant planning authority to reflect the content and requirements of these guidelines and properly inform the public of the relevant SPPR requirements."*

The Building Height Guidelines 2018 are the predominant context for assessment of height in this case. We note that Dún Laoghaire Rathdown County Council has prepared an Urban Density and Building Heights Study, 2021 to accompany the City Development Plan and the proposed development has had due regard to this study in addition to the Building Height Guidelines.

From the outset, it is noted that the Building Height Guidelines 2018 expressly seek to increase building heights at appropriate urban locations and adjacent to key public transport corridors.

"In relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility."

Specific Planning Policy Requirements

The following Specific Planning Policy Requirements are considered particularly relevant to the current site context and the compliance of the scheme with these SPPRs is set out below.

SPPR 3 (A)

"It is a specific planning policy requirement that where:

(A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise."

Applicant Response to SPPR 3A

The performance of the proposal vis a vis the building height criteria is further assessed below in sub-section 'Development Management Criteria'.

Development Management Criteria

The Guidelines clearly set out that in the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority that the proposed development satisfies the Development Management Criteria. The relevant criteria, followed by an applicant response is set out in Appendix I of the Planning Report prepared by Brock McClure to clearly demonstrated

for the Planning Authority that the current proposal respects the outlined Development Management Criteria.

In consideration of responses contained in Appendix I of the Planning Report prepared by Brock McClure, the current proposal for 414 no. apartment units can be positively considered on this site by the competent authority. Specifically, the proposal has addressed the specific development criteria requirements of the Building Height Guidelines 2018 and is in compliance with the key SPPRs. Most notably the site's location is considered to address the very spirit and intent of the Building Height Guidelines 2018 that being one proximate to public transport and a variety of services.

We submit to that the subject proposal is consistent with the Urban Development and Building Height Guideline for Planning Authorities (2018).

3.3.4 Guidelines for Planning Authorities on Childcare Facilities, 2001

Childcare Facilities

Guidelines for Planning Authorities

The Childcare Guidelines provide a framework to guide local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals. The Guidelines are intended to ensure a consistent approach throughout the country to the treatment of applications for planning permission for childcare facilities.

The Guidelines state: *"Access to quality childcare services contribute to the social, emotional and educational development of children. There are clear economic benefits from the provision of childcare. The lack of accessible, affordable and appropriate childcare facilities makes it difficult for many parents/guardians to access employment and employment related opportunities."*

The Guidelines identify several appropriate locations for childcare facilities, which include the following:

- New Communities/Large Housing Developments
- The vicinity and concentrations of workplaces, such as industrial estates, business parks and any other locations where there are significant numbers working
- In the vicinity of schools
- Neighbourhood, District and Town Centres
- Adjacent to public transport corridors, park and ride facilities, pedestrian routes, and dedicated cycle ways

Notwithstanding the locations identified above, the Guidelines state that proposals should have regard to the following:

- Child Care (Pre-School Services) Regulations, 1996.
- Suitability of the site for the type and size of facility proposed.
- Availability of outdoor play area and details of management of same.
- Convenient to public transport nodes.
- Safe access and convenient parking for customers and staff.
- Local traffic conditions.
- Number of such facilities in the area; and
- Intended hours of operation.

The recommendation for new housing developments is the provision of 1 facility for each 75 dwellings. This will generally provide for 20 childcare spaces based on a requirement of 35 of such dwellings requiring childcare spaces.

Based on the mix proposed, we note the following requirements for childcare:

50% of 2 and 3 bedroom units will require childcare provision. We have identified that there are 242 x 2 and 3 bedroom units (159 x 2 bedroom units and 83 x 3 bedroom units) proposed and so 50% equates to 121 no. units having the potential to require childcare.

The worst case scenario or uppermost requirement is that all 2 and 3 bed units have the potential to create demand for childcare provision. On this basis, **a total of 414 units therefore have the potential to require childcare based on the current unit mix (159 x 2 beds and 83 x 3 beds)**. We note the following calculations in this regard:

- 242 units - 1 facility required for every 75 units = $121/75 = 3.2$
- 20 childcare spaces required for every 75 units = $20 \times 1.61 = \mathbf{c. 64 \text{ spaces required}}$

A childcare facility of approx. 401 sqm is proposed at ground floor level at the eastern elevation. Locating the childcare facility at this portion of the site facilitates direct access off the proposed link road resulting in a safe and secure environment for child drop off and pick up. The childcare facility is afforded an appropriate outdoor play area.

The childcare facility has been designed to provide for the childcare needs of the proposed development. The facility has been scaled with additional headroom to accommodate not only demand arising from the proposed scheme, but also future phases of development.

The proposal allows for an outside play space, vehicle drop off and dedicated staff cycle parking.

The current proposal is therefore in compliance with the key objectives of the Guidelines for Planning Authorities on Childcare Facilities (2001) as amended by the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023).

3.3.5 Part V of the Planning and Development Act 2000: Guidelines (2017)

This Guidance document advocates consideration of Part V issues at the earliest point possible. The subject proposal is entirely consistent with the 2017 Guidelines, which states:

"The acquisition of units on the site of the development is the recommended option in order to advance the aim of achieving a social mix in new developments. This option should be pursued by the local authority from its earliest engagement with the developer, with a view to acquiring houses which meet its social housing requirements for that area/site."

The proposed development is a Part 10 Application as GCC is the Applicant in partnership with the LDA. The entire scheme is an affordable and social housing development.

Of the 414 no. units proposed, 41 no. apartments (10%) will be provided under the Social Housing scheme.

Whilst Part V does not apply to local authority own development, the proposed development exceeds the requirements of Part V of the Planning and Development Act 2000 (as amended) as a 100% Social and Affordable Housing Scheme is proposed.

3.3.6 Guidance on Appropriate Assessment for Planning Authorities, 2009

Appropriate Assessment of Plans and Projects in Ireland

Guidance for Planning Authorities

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

We confirm that an Appropriate Assessment Screening Report and subsequent Natura Impact Statement has been prepared by DNV and forms part of the application documentation.

3.3.7 NPF Implementation: Housing Growth Requirements, 2025

On 29 July 2025 the Minister for Housing, Local Government and Heritage issued direction in the form of Section 28 Guidelines entitled '*NPF Implementation: Housing Growth Requirements*'. Specifically, the Minister has directed each Planning Authority to review their Development Plans to ensure consistency with new national housing targets set by the National Planning Framework (NPF) in April 2025.

At the county level, Dún Laoghaire Rathdown County Council is now required to review the Dún Laoghaire Rathdown County Development Plan against new annual housing targets set. Notably and as published in the new Guidelines, the new targets identified for the Dún Laoghaire Rathdown extend to 3,085 housing units per annum between 2025 and 2034 and a further 2,384 units per annum between 2035 and 2040. There is an additional headroom figure of 50% to be provided for.

This application delivers 414 no. residential units at a net density of 119 units per ha, which is within the density level for the sites category as a city centre site. This proposal is considered to deliver on the spirit of the guidelines and policy objective requirements to support the delivery of housing at key locations whilst ensuring that the proposal is sensitive to the established built heritage and local context.

3.4 Dún Laoghaire Rathdown County Development Plan 2022-2028

The Dún Laoghaire-Rathdown County Development Plan 2022-2028 is the relevant statutory planning context governing the subject site. This Plan will remain valid for 6 years, subject to any review, variations, extensions or alterations made during the lifetime of the permission.

It is submitted that it is the design team's full intention for the subject scheme to be in compliance with the site zoning, key development objectives and key development standards.

A detailed compliance assessment with relevant development plan objectives will be contained in any application that proceeds.

3.4.1 Core Strategy

Chapter 2 of the County Development Plan sets outs that the main focus of the Core Strategy is to demonstrate that there is a reasonable balance between the quantum of zoned, serviced lands included for residential use and the estimated demand for housing based on the projected population targets for the plan period.

Section 2.3.2 of the Development Plan states that the RSES sets out a targeted pattern of growth for Dún Laoghaire Rathdown to reach population of 250,500 – 257,000 in 2031.

Year	2016 (CSO Census)	2026 (Projection)	2031 (Projection)
Population	218,018	241,000 – 245,500	250,500 – 257,000

Table 3.4 – Population Projections for Dún Laoghaire Rathdown County

The figure below identifies the Core Strategy.

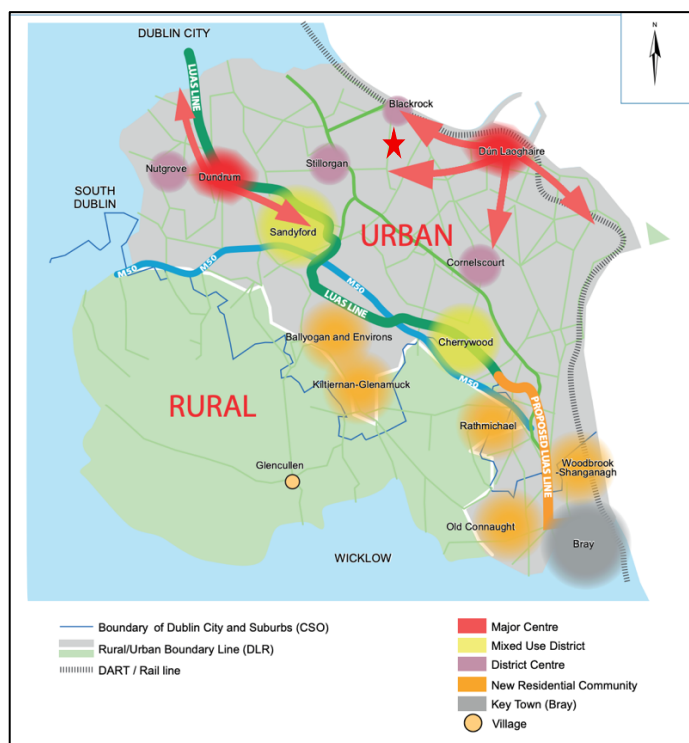


Figure 3.2 – Core Strategy Map with Subject Site marked with a Red Star

Section 2.3.6.5 of the Development Plan estimates that there will be a need **at a minimum** for an additional 15,225 housing units in the county over the plan period up to the end of 2028. The table below sets out the estimated housing need taking into account an 'existing' unmet need for 186 units. A total demand of 15,225 housing units is estimated over the plan period.

	Dún Laoghaire-Rathdown	Annual Average	Total Households
A	ESRI NPF Scenario projected new household demand 2017 to Q1 2028	1798	20,223
B	CSO dwelling completions Q1. 2017 to Q1 2021+ Estimated completions Q2 2021 to Q1 2022	1046	5492
C	Homeless households	n/a	494
D	Plan Housing Demand+ Total (A-B+C)	2538	15,335

Table 3.5 – Total Annual Housing Need 2023-2028

Section 2.3.7.2 provides a composite picture of lands zoned and identifies that zoned lands can accommodate the housing target of 15,225 for the period of the Plan as per the breakdown and allocation in the table below.

Location	Hectares	Potential Residential Yield	Zoning Tier
Infill/Windfall – Sites under Construction	35.63	1,837	Tier 1
Infill/Windfall – Sites with an extant planning permission not commenced	63.1	1,299	Tier 1
Infill/Windfall-Sites with no planning permission	67.13	1,436	Tier 1 and Tier 2
Infill/Windfall - Total	165.86	4,571	Tier 1 and Tier 2

Table 3.6 – Settlement Capacity Audit'

Further, Section 2.3.7.2 of the Plan states that Tier 1 lands are Dublin City and Suburbs describes as *“International business core with a highly concentrated and diversified employment base and higher order retail, arts, culture and leisure offer. Acts as national transport hub with strong inter and intra-regional connections and an extensive commuter catchment ...”*

Based on this description, the subject site is within the 'Tier 1 lands'. It is important to set out that these yields are overall 'targets' as opposed to 'upper' or 'maximum' limits. From the table the potential residential yield for this site is **1,299**

Our review above identifies 63% of identified infill/windfall sites in the County are under construction or have the benefit of an extant planning permission. Given the tiered 1 zoning, priority is given to residential development on this land as the lands are serviced and contiguous to the built-up footprint of an area. This can be viewed in the figure below:

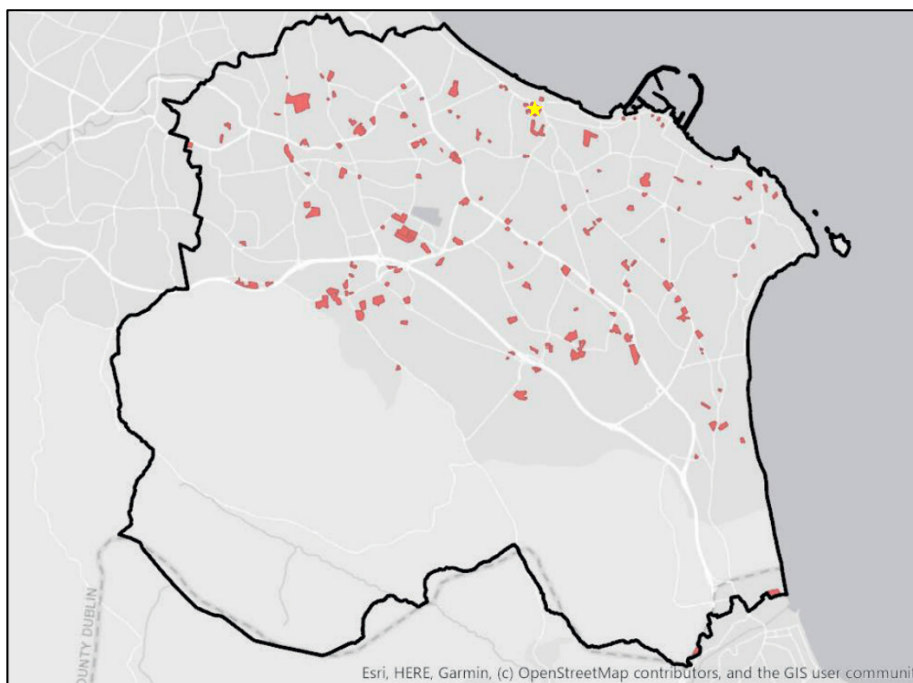


Figure 3.3: Map of infill sites in Dún Loaghair Rathdown County Council

The main focus of the Core Strategy is on residential development and in ensuring that there is an acceptable equilibrium between the supply of zoned, serviced land for the projected demand for new housing, over the lifetime of the Plan.

Given these considerations, it is submitted that there is considerable flexibility within the Core Strategy in terms of the delivery of additional units over and above the target figures set out in Table 17 above. The latest data indicates that there is scope to adjust the strategy to better meet the evolving housing demands and to align more closely with updated planning guidelines and policies. The First Revision to the NPF has been revised based on the Economic & Social Research Institute (ESRI) publication of "Population Projections, The Flow of New Households and Structural Housing Demand," published on 2nd July 2024. This report provides estimates of structural (demographic) housing demand at a regional level. The report highlights that this recent data means that **many previous population scenarios for Ireland have underestimated population growth over the short term.**

As such, the targets established in the County Development Plan serve as broad guidelines rather than rigid limits, designed to accommodate a range of housing needs and to support the city's overall growth strategy. The proposed development of 414 no. apartment units on a site identified for regeneration, aligns directly with the core strategy of the Dún Laoghaire Rathdown Development Plan. The development supports the broader objective of accommodating population growth while ensuring that Dún Laoghaire Rathdown County becomes a more compact, vibrant, and sustainable urban centre. The integration of a broad mix of housing types and tenures, along with the focus on creating a high-quality living environment, is fully in line with the strategic goals set out for the city's future development.

3.4.2 Zoning

The site zoning is identified in the figure below:



Figure 3.4 – Extract from DLR County Development Plan 2022-2028 Zoning Map with Subject Site outlined in Red

The site is zoned as **Objective A** which has the following objective:

Objective A - To provide residential development and improve residential amenity while protecting the existing residential amenities.

Uses permitted in principle under this zoning include **'Residential', 'Childcare Facility'** as currently proposed. We note that the proposed residential uses, crèche facility are therefore permitted in principle under the zoning.

'Tea Room/Café' and 'Sports Facility' are open for consideration. Proposed café and gym element of the residential amenity area are considered an appropriate ancillary uses to the residential use.

In addition, a portion of the site is zoned 'F' - "To preserve and provide for open space within ancillary recreational amenities". We can confirm that the only use proposed for this portion of the site is **'Open Space'**, which is a permitted use under the zoning objective.

A residential development is therefore permitted in principle under this zoning objective.

Objective 'INST': 'To protect and/or provide for Institutional Use in open lands' is noted. This objective is particularly relevant in context of provision of a minimum of 25% of the entire INST land parcel.

In addition, a portion of the site is zoned 'F' - "To preserve and provide for open space within ancillary recreational amenities". We can confirm that the only use proposed for this portion of the site is **'Open Space'**, which is a permitted use under the zoning objective.

The subject site includes an objective to protect and preserve Trees and Woodlands.

- a) 'St. Teresa's House' or Centre which is a 3 storey Victorian House; RPS No: 398
- b) 'St. Teresa's Lodge' known as 'The Gate Lodge', which is a single storey property located at the main entrance to the site off Temple Hill, RPS No: 1960; and
- c) Entrance Gates along the north of the site, RPS No: 398.

3.4.3 Height

The Development Plan contains a Building Height Strategy (Appendix 5), which is considered of particular relevance to the subject site, and which has incorporated the requirements of the Building Height Guidelines (2018). We note specifically **Policy Objective BHS 1 - Increased Height** is of particular relevance, which states:

"It is a policy objective to support the consideration of increased heights and also to consider taller buildings where appropriate in the Major Town Centres of Dún Laoghaire and Dundrum, the District Centres of Nutgrove, Stillorgan, Blackrock, and Cornelscourt, within the Sandyford UFP area, UCD and in suitable areas well served by public transport links (i.e. within 1000 metre/10 minute walk band of LUAS stop, DART Stations or Core/Quality Bus Corridor, 500 metre/5 minute walk band of Bus Priority Route) provided that proposals ensure a balance between the reasonable protection of existing amenities and environmental sensitivities, protection of residential amenity and the established character of the area. (NP0 35, SPPR 1& 3)."

With regard to the requirements listed above, the subject site is considered to be suitable for increased height and taller buildings and particularly given its central/accessible location and proximity to high-quality and high-frequency public transport. The site is within 1km of Blackrock Village and has high accessibility to public transport. The N31 (Temple Road) is designated as a proposed QBC and both Blackrock DART Station (c. 700m from subject site) and Seapoint DART Station (c. 550m from subject site) are within easy walking distance.

Development Management Criteria from the Building Height Guidelines (2018) have generally been incorporated as per Table 5.1 the Building Height Strategy of the Development Plan. These criteria will addressed in Appendix I of the Planning Report.

3.4.4 Density

We note that 4.3.1.1 Policy Objective PHP18: Residential Density of the Development Plan states that it is a Policy Objective to:

- 'Increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12.
- Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.'
- 'The 'Sustainable Residential Development in Urban Areas' Guidelines and the accompanying 'Urban Design Manual' include recommendations regarding appropriate densities for various types of locations. Having regard to the Guidelines and consistent with RPO 3.3 and 4.3 in the RSES:
- Where a site is located **within circa 1 kilometre pedestrian catchment / 10 minute walking time of a rail station, Luas line, Core/Quality Bus Corridor and/or 500 metres / 5 minute walking time of a Bus Priority Route, and/or 1 kilometre / 10 minute walking time of a Town or District Centre, higher densities at a minimum of 50 units per hectare (net density) will be encouraged.'**
- 'As a general rule the minimum default density for new residential developments in the County (excluding lands on zoning Objectives 'GB', 'G' and 'B') shall be 35 units per hectare (net density¹). **This density may not be appropriate in all instances but should be applied particularly in relation to 'greenfield' sites or larger 'A' zoned areas.** Higher density schemes should offer an exemplary quality of life for existing and future residents in terms of design and amenity.'

The proposal has also had regard to the most recent Section 28 Guidelines including:

- Sustainable Housing: Design Standard for New Apartments (2025)
- Urban Development and Building Height Guidelines (2018)
- Sustainable and Residential Compact Settlement Guidelines for Planning Authorities (2024)

The proposal delivers on all standards and requirements set by these guidelines including SPPrs where relevant.

The density is based on 414 units on a 3.51 ha net developable site. This equates to 119 units per ha and is considered appropriate given the proximity of the site to public transport such as the DART and the Blackrock bus corridor. A density of this nature is supported by national policy which is aiming to deliver increased height and densities at appropriate locations.

3.4.5 Residential Mix

Apartment mix requirements are given by the Development Plan as per Table 12.1. for the context of the subject site:

'Apartment Developments may include up to 80% studio, one and two bed units with no more than 30% of the overall development as a combination of one bed and studios and no more than 20% of the overall development as studios. Minimum 20% 3+ bedroom units.'



Figure 3.5 – Proposed new buildings and buildings to remain unchanged

Blocks A1, B1-B4 and H remain as permitted under the parent permission ABP-303804-19, including their residential mix.

Blocks C1, C2, D1, E1 and E2 have been revised under the subject proposal.

The residential development mix provides for 252 no. units in amended blocks as follows:

- 8 x studio units (3.2%)
- 56 x 1-beds (22.2%)
- 10 x 2-bed (3p) (4%)
- 114 x 2-bed (4p) (45.2%)
- 64 x 3-beds (25.4%)

Overall Unit Mix

The overall proposed mix provides for 414 no. units is as follows:

- 8 x studio (1.93%)
- 164 x 1-beds (39.61%)
- 10 x 2-bed (3p) (2.42%)
- 149 x 2-bed (4p) (35.99%)
- 83 x 3-beds (20.05%)

When considered independently, the new residential mix of blocks subject to this amendment application (Blocks C1, C2, D1, E1, E2) meet the requirements of the current Dún Laoghaire Rathdown Development Plan 2022-2028. The unit mix of the overall development is also in compliance with the Development Plan.

We note in this regard that the Development Plan sets out under Policy PHP27 that a wide variety of housing and apartment types, sizes and tenures is provided and the current proposal delivers this. A Statement of Housing mix accompanies the current application concluding that the proposed development comprises a residential scheme providing for a mix of 1-bedroom, 2-bedroom, 3-bedroom units. The area in which the subject site is located has a demographic profile

weighed towards single households and couples, as reflected in the proposed unit mix for the development.

Key statistics from the assessment of the area profile has informed the proposed mix of residential units. The data analysed to inform this report highlights the following:

At this strategically located site, the St. Teresa's development presents an opportunity to respond to the needs of the local population, by providing an appropriate mix of units that is aligned with housing need and market demand.

Furthermore, publishing of the new Planning Design Standards for Apartments Guidelines (2025) is noted. The Guidelines do not set any requirements on unit mix. For more details we refer to Appendix I of the Planning Report.

It is submitted that the proposed unit mix when considering both, amended blocks and the overall development is in compliance with the Development Plan and Apartment Guidelines.

3.4.6 Car Parking

It is stated in the Development Plan in Section 12.4.5. that quantitative Car Parking Standards should comply with Development Plan requirements. The subject site is in the Parking Zone 2 as per the Development Plan – Map T2. For this zone it is stated the following:

“Within parking zone 2 maximum standards shall apply for all uses except for residential where the standard is required. For residential uses reduced provision may be acceptable dependent on criteria set out in Section 12.4.5.2 below.

We note generally that the requirements detailed under the Development Plan for the zone 2 and the current proposal requirements are as follows:

Proposed Use	Development Plan Requirement for Zone 2 Areas	Proposal	Current Proposal Requirements	Current Provision
Residential Element	Standard: Long-term: 1 space per 1 and 2 bed apt units 2 spaces per 3 bed apt units	8 x studio 164 x 1-bed 10 x 2-bed (3p) 149 x 2-bed (4p) 83 x 3-beds	8 apartments x 1 space 164 apartments x 1 space 159 apartments x 1 space 83 apartments x 2 spaces 497 spaces total for residential element Visitor spaces should be also provided	236 no. residential spaces at basement and surface levels, out of which 19 no. spaces are for visitors.
Creche	Maximum: 1 space per 60 sq m	401 sq m	7	8 no. dedicated creche parking spaces at surface level

Table 3.7 Extract from Table 12.4.5 Car Parking Zones and Standards of the Development Plan

Based on these requirements, a total of 497 no. spaces are required for the residential element of the scheme 7 no. for other uses. A total of 236 no. car parking spaces are proposed for the 414no. residential units, which equates to 0.57 space per unit. An additional 8 no. spaces are allocated to the creche. This is considered an acceptable provision given the proximity to Luas. We note that the Development Plan makes provision for a reduced level of parking in cases where the site is located proximate to public transport.

It is noted that the car parking ratio 0.93 was permitted under ABP-303804-19 and 0.51 was proposed under ABP-312325-21. Both parking ratios were seen acceptable by An Coimisiún Pleanála.

We note that 5% of all spaces will be disabled parking spaces and 20% will have electric power charging points. 20 no. motorcycle spaces are also proposed.

3.4.7 Cycle Parking

The Dún Laoghaire Rathdown Standards for 'Cycle Parking and associated Cycling Facilities for New Developments (January 2018)' are acknowledged. These standards require the following provision for residential use:

- Long Stay: 1 space per unit.
- Short Stay: 1 space per 5 units

Notwithstanding the above, we note that Section 4.17 of the 'Design Standards for New Apartments – Guidelines for Planning Authorities (2025)' require the following provision:

- Long Stay: 1 cycle space per bedroom
- Short Stay (visitor): 1 cycle space per 2 units

SPPR 4 of the 'Sustainable Residential Development and Compact Settlements Guidelines (2024)' requires a general minimum standard of 1 cycle storage space per bedroom.

Based on the requirements contained within the current Development Plan, a total of 414 long stay and 83 short stay spaces are required for the residential element. Under the Design Standards for New Apartments, a total of 948 spaces are required. The proposal of 948 spaces for residential units meets requirements.

In addition, bicycle parking spaces are required for a non-residential element as follows:

	Visitors (minimum 2 spaces to be provided)	Long-term (minimum 2 spaces to be provided)
Creche	1 per 10 children	1 per 5 staff
Café	1 per 100 sqm PFA	1 per 5 staff

Table 3.8 Table 18 – Bicycle Parking

14 no. bicycle parking spaces for non-residential elements are proposed as follows:

- Creche: 4 no. staff parking, 6 no. visitor parking
- Café: 2 no. staff parking, 2 no. visitor parking

A total of 962 no. bicycle parking spaces are proposed at both basement and surface level.

Residents long term bike spaces on Sheffield stands are provided in compliance with requirements of the Development Plan = 414 no. spaces on Sheffield stands

Visitors short term bicycle spaces on Sheffield stands are provided in compliance with requirements of the Development Plan = 83 no. spaces on Sheffield stands

Additional visitor short term bicycle are provided in compliance with the Apartment Guidelines (2025), all on Sheffield stands = 126 no. spaces on Sheffield stands

Creche and café have Sheffield stands= 14 no. spaces on Sheffield stands

Total spaces on Sheffield stands = 637 no. spaces

Total spaces on two-tier stands = 325 no. spaces

Bicycle Parking will be accessible, secure, well overlooked and conveniently located.

3.4.8 Open Space

Section 12.3.7.10 of the Development Plan sets out that a minimum public open space provision of 25% of the total site area will be required on Institutional Lands.

High quality POS is provided consisting of parkland (central space), garden link, tree belt and woodland park. It is submitted that POS meets 25% requirement:

Net site area (wayleaves, road improvements to Temple Hill Road and Zone F lands excluded from the overall site area): 35,141 sqm

Required: 8782.25 sqm (25%)

Provided (without Zone F lands): **9216 sqm (26.2%)**

C. 11,238 sqm (30.2 %) is proposed including woodland portion (2022 sqm) on F zoned lands.

Residential communal open space is proposed in the form of entrance gardens, plazas, terraces, gardens and roof terraces for Blocks B2 and B3 and equates to **c. 3,620 sqm**.

In terms of quantitative provision, the development exceeds the standards prescribed by the Design Standards for New Apartments 2025 reflected in Section 12.8.3.2 of the Development Plan.

The subject proposal generates a requirement for **2,702 sqm** communal open space as follows:

- 4 sqm for studios – 8 x 4 sqm = 32 sqm
- 5 sqm for 1 beds - 164 x 5 sqm = 820 sqm
- 6 sq m for 2 beds (3 person) - 10 x 6 sq m = 60 sqm
- 7 sqm for 2 beds (4 person) - 140 x 7 sqm = 1,043 sqm
- 9 sqm for 3 bed - 83 x 9 sqm= 747 sqm

It is submitted that the subject proposal meets and exceeds these standards while meeting qualitative requirements.

3.4.9 Development Plan Policies and Objectives

Policy Objective	Response
Housing Policies	
Policy Objective CS1 – Housing Need Demand Assessment It is a Policy Objective to accord with the Housing Strategy and Housing Needs Demand Assessment 2022—2028 and to carry out a	The proposed development provides new 414 no. apartment units to the area with a variety of apartment types and sizes to reflect diverse housing needs of the existing future population. The proposed

regional HNDA post adoption of the Plan and to consider varying the Plan if required. (Consistent with NPO 37 of the NPF).	development has had regard to the Housing Need Demand Assessment.
Policy Objective PHP18: Residential Density It is a Policy Objective to: • Increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12. • Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.	Chapter 12, Section 12.3.1.1. states in relation to density as follows: "Higher densities should be provided in appropriate locations. Site configuration, open space requirements and the characteristics of the area will have an impact on the density levels achievable." Furthermore, Section 12.3.3.2 has strong regards to Section 28 Guidelines. It is submitted that the proposed development provides 414 no. new apartment units resulting in a residential density of 119 dph on a net site area of 3.51 ha which sits comfortably in a range of 50-250 uph as required for an City - Urban Neighbourhood by the Sustainable Residential Development and Compact Settlements Guidelines (2024).
Policy Objective PHP20: Protection of Existing Residential Amenity Protection of Existing Residential Amenity. It is a Policy Objective to ensure the residential amenity of existing homes in the Built Up Area is protected where they are adjacent to proposed higher density and greater height infill developments.	The proposed development is designed to strike a careful balance between protecting the existing residential amenities, maintaining the established character of the area, and accommodating the need for sustainable new development. The project has been thoughtfully planned to minimise any potential negative impacts on the surrounding residential community, with particular attention given to maintaining privacy, access to light, and the overall comfort of neighbouring properties.
Policy Objective PHP31: Provision of Social Housing. It is a Policy Objective to promote the provision of social housing in accordance with the Council's Housing Strategy and Government policy as outlined in the DoHPLG 'Social Housing Strategy 2020'. The Affordable Housing Act 2021 provides for 20% for social and affordable homes.	10% of the proposed apartment units shall be provided for Part V – social housing purposes which would be 41 units out of the 414 housing units.
Policy Objective PHP26: Implementation of the Housing Strategy It is a Policy Objective to facilitate the implementation and delivery of the Housing Strategy and Housing Need Demand Assessment (HNDA) 2022 - 2028.	The 414 no. residential units will deliver and implement the Housing Strategy which is a main requirement set out in the Core Strategy of the County Development Plan.
Policy Objective PHP27: Housing Mix It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of	The residential scheme provides 4 different apartment types: studio, one bedroom, two bedroom, three bedrooms. These apartment types are of various sizes to encourage a sustainable residential community. It is submitted that a proposed unit mix is in compliance

housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Housing Need Demand Assessment (HNDA) and any future Regional HNDA.	with the Development Plan and the Apartment Guidelines and addresses 10-min walking distance unit mix.
Protected Structures	
Policy Objective HER8: Work to Protected Structures It is a Policy Objective to: - Protect structures included on the RPS from any works that would negatively impact their special character and appearance. - Ensure that any development proposals to Protected Structures, their curtilage and setting shall have regard to the 'Architectural Heritage Protection Guidelines for Planning Authorities' published by the Department of the Arts, Heritage and the Gaeltacht. - Ensure that all works are carried out under supervision of a qualified professional with specialised conservation expertise. - Ensure that any development, modification, alteration, or extension affecting a Protected Structure and/or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout, and materials. - Ensure that the form and structural integrity of the Protected Structure is retained in any redevelopment and that the relationship between the Protected Structure and any complex of adjoining buildings, designed landscape features, or views and vistas from within the grounds of the structure are respected. - Respect the special interest of the interior, including its plan form, hierarchy of spaces, architectural detail, fixtures and fittings and materials. - Ensure that new and adapted uses are compatible with the character and special interest of the Protected Structure. - Protect the curtilage of protected structures and to refuse planning permission for inappropriate development within the curtilage and attendant grounds that would adversely impact on the special character of the Protected Structure. - Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features. - Ensure historic landscapes and gardens associated with Protected Structures are protected from inappropriate	The proposed redevelopment has been carefully designed to respect and retain, where possible, the three Protected Structures located on the site: St' Teresa's House' which is a 3 story Victorian House RPS Reference No: 398, St. Teresa's Lodge known as 'Gate Lodge' RPS Reference No: 1960 and the Entrance Gates along north of the site RPS Reference 398; recognising its architectural, historical and contextual significance. For further details we refer to AHIA prepared by CONA and Gate Lodge Report prepared by BMC.

development (consistent with NPO 17 of the NPF and RPO 9.30 of the RSES)	
Policy Objective PHP6: Childcare Facilities a) It is a Policy Objective to: Encourage the provision of appropriate childcare facilities as an integral part of proposals for new residential developments and to improve/expand existing childcare facilities across the County. In general, at least one childcare facility should be provided for all new residential developments subject to demographic and geographic needs. b) Encourage the provision of childcare facilities in a sustainable manner to encourage local economic development and to assist in addressing disadvantage.	The proposed development incorporates a childcare facility of approx. 401 sqm with dedicated open space and a children's play area at ground floor level in Block C2 as part of the development. The proposed childcare facility has been appropriately sized to cater for the future residents of the proposed development.
Compact Growth	
Policy Objective CS11 – Compact Growth It is a Policy Objective to deliver 100% of all new homes, that pertain to Dublin City and Suburbs, within or contiguous to its geographic boundary. (Consistent with RPO 3.2 of the RSES)	The subject site located within a built-up area of Dublin. It is zoned Objective A <i>To provide residential development and improve residential amenity while protecting the existing residential amenities</i>. The proposed development provides 414 no. Residential apartment units, 1 no. café and a childcare facility, on a site that is well served by public transport, walking network and cycling networks promoting principles of compact urban growth.
Neighbourhood – People, Homes and Place	
Policy Objective PHP3 – Planning for Sustainable Communities It is a Policy Objective to Plan for communities in accordance with the aims, objectives and principles of 'Sustainable Residential Development in Urban Areas' and the accompanying 'Urban Design Manual – A Best Practice Guide' and any amendment thereof. Ensure that an appropriate level of supporting neighbourhood infrastructure is provided or that lands are reserved for Sustainable Neighbourhood Infrastructure (SNI), in conjunction with, and as an integral component of, residential development in new residential communities as identified in the Core Strategy (see Figure 2.9, Chapter 2). Identify, provide and/or improve (as appropriate) supporting sustainable neighbourhood infrastructure in tandem with residential development in renewal/redevelopment areas and existing residential neighbourhoods. Create healthy and attractive places to live consistent with NPO 4 of the NPF and RPO 9.10 of the RSES.	As a response to these objectives a detailed Social, Community and Infrastructure Audit has been prepared to assess available services in the area and it forms a part of this application. It concludes that there is a satisfactory level of the infrastructure to cater for future residents of the subject development.

Policy Objective PHP4 – Villages and Neighbourhoods It is a Policy Objective to implement a strategy for residential development based on a concept of sustainable urban villages. Promote and facilitate the provision of '10-minute' neighbourhoods.	RECEIVED: 29/05/2026
Policy Objective PHP6 – Childcare Facilities It is a Policy Objective to Encourage the provision of appropriate childcare facilities as an integral part of proposals for new residential developments and to improve/expand existing childcare facilities across the County .In general, at least one childcare facility should be provided for all new residential developments subject to demographic and geographic needs.	A childcare facility of 401 sqm is provided on site to cater for childcare demand arising from the subject development. For a detailed Childcare Need Assessment, we refer to the Social, Community and Cultural Infrastructure Audit forming a part of the subject application.
Policy Objective PH18 – Residential Density It is a Policy Objective to Increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12. Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.	The subject proposal provides for a density of 119 uph which sits comfortably within a density range for sites the proximity to high quality public transport such as the DART and the Blackrock bus corridor. It is submitted that site constraints such as protected structures on the site and surrounding residential properties were considered in compliance with the relevant guidelines. Refer to Section 9.1 of the Planning Report.
Policy Objective PH20 – Protection of Existing Residential Amenity It is a Policy Objective to ensure the residential amenity of existing homes in the Built Up Area is protected where they are adjacent to proposed higher density and greater height infill developments.	Adjoining residential developments were carefully considered. St. Vincent's Park and St. Louise's Park were identified as sensitive and potentially impacted by the proposed amendments. Massing proposal accompanied by multiple mitigation measures address adjoining properties. Detailed Sunlight and Daylight Assessment as well as Visual Impact Assessment conclude that when the required density and scale of the proposed development are taken into consideration, the impact of the newly proposed buildings can be considered favourable. Refer to Section 7 of the Planning Report.
Policy Objective PH21 – Development on Institutional Lands It is a Policy Objective to retain the open character and/or recreational amenity of land parcels that are in institutional use (such as religious residential or other such uses) and are proposed for redevelopment.	It is submitted that Institutional Lands zoning objective has been considered in the proposal. The subject development exceeds 25% public open space requirement and maintains an open character of the subject lands while delivering a required density. Refer to Section 6 of the Planning Report.

Policy Objective PH25 – ‘Housing for All – A New Housing Plan for Ireland, 2022’ It is a Policy Objective to support as appropriate the delivery of the actions set out in the 4 pathways contained in ‘Housing for All – A New Housing Plan for Ireland, 2021’.	It is submitted that the subject proposal has regards to the ‘Housing for All – A New Housing Plan for Ireland, 2002’. Refer to Section 8 of the Planning Report for a detailed compliance.
Policy Objective PH26 – Implementation of the Housing Strategy It is a Policy Objective to facilitate the implementation and delivery of the Housing Strategy and Housing Need Demand Assessment (HNDA) 2022 - 2028.	The subject proposal delivers 414 no. high quality apartment units as follows: • 8 x studio (1.93%) • 164 x 1-beds (39.61%) • 10 x 2-bed (3p) (2.42%) • 149 x 2-bed (4p) (35.99%) • 83 x 3-beds (20.05%)
Policy Objective PH27 – Housing Mix It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Housing Need Demand Assessment (HNDA) and any future Regional HNDA.	Unit typology and unit mix was carefully considered and assessed against the HNDA in the Residential Unit Mix Assessment Report accompanying the subject application.
Policy Objective PH30 – Housing for All It is a Policy Objective to Support housing options for older people and persons with disabilities/mental health issues consistent with NPO 30 in the NPF, RPO 9.1 and 9.12 of the RSES. Support the provision of specific purpose built accommodation, including assisted living units and lifetime housing, and adaptation of existing properties. Promote ‘aging in place’ opportunities for ‘downsizing’ or ‘right sizing’ within their community.	The proposed development is in line with the Housing Strategy as it provides 41 no. social housing units under Part V. The housing provided overall is energy efficient, good mix of good quality housing and is accessible for all. This has been demonstrated in the objective addressed below.
Policy Objective PH35 – Healthy Placemaking It is a Policy Objective to Ensure that all development is of high quality design with a focus on healthy placemaking consistent with NPO 4, 26 and 27 of the NPF, and RPO6.1, 6.12, 9.10 and 9.11 of the RSES. Promote the guidance principles set out in the ‘Urban Design Manual – A Best Practice Guide’ (2009), and in the ‘Design Manual for Urban Roads and Streets’ (2013). Ensure that development proposals are cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design.	It is submitted, that the subject proposal is in compliance with all relevant planning policy as demonstrated across the pack. All aspects have been carefully considered and they are outlined in the Design Statement prepared by OMP Architects.
Policy Objective PH36 – Inclusive Design and Universal Access	It is submitted, that the public open spaces are universally accessible and offer a range of active and passive recreational uses. Two active play spaces are

It is a Policy Objective to promote and support the principles of universal design ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.	provided catering to different age groups. A trim trail is provided through the Tree Belt, open to residents and to the public. The central open parkland immediately in front of St Teresa's House is a large grassed and planted garden space suitable for both active and passive recreational uses. Throughout the site permanent seating is provided. Universal Design units are provided within the subject proposal.
Policy Objective PHP37: Public Realm Design It is a Policy Objective that all development proposals, whether in established areas or in new growth nodes, should contribute positively to an enhanced public realm and should demonstrate that the highest quality in public realm design is achieved.	The subject development delivers high quality public realm design. It is noted that urban frontage along Temple Road is not amended by the subject application.
Policy Objective PHP41: Safer Living Environment It is a Policy Objective to facilitate the promotion and delivery of a safe environment for both the residents of, and visitors to, the County.	The design team have sought to maximise security and safety within the proposed development as follows: • Ensuring that all public spaces within the development are overlooked by the surrounding buildings • Providing high levels of glazing in the communal areas of the apartment blocks • Providing high levels of lighting in all communal and parking areas Providing privacy strips where units front directly onto the public/ communal open space.
Policy Objective PHP42: Building Design & Height It is a Policy Objective to: Encourage high quality design of all new development. Ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF).	The design of the proposal is of high-quality and reflects on its surrounding context. Detailed compliance with the Building Height Strategy is set out in Appendix I of the Planning Report.
Policy Objective PHP44: Design Statements It is a Policy Objective that, all medium to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) submit a 'Design Statement' and shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the 'Urban Design Manual - A Best Practice Guide' (DoEHLG, 2009) and incorporates adaptability of units and/or space within the scheme.	A Design Statement has been prepared and submitted by OMP Architects detailing rationale behind the proposal and its technical parameters. Furthermore, it addresses compliance with placemaking criteria of the 'Sustainable Residential Development and Compact Settlements'.

Policy Objective OSR13: Play Facilities and Nature Based Play It is a Policy Objective to support the provision of structured, and unstructured play areas with appropriate equipment and facilities, incorporating and facilitating Nature-based Play with respect to the provision of Play Opportunities throughout the County. These play facilities will also seek to maximise inclusivity and accessibility, to ensure that the needs of all age groups and abilities – children, teenagers, adults and older people – are facilitated in the public parks and open spaces of Dún Laoghaire – Rathdown	Comprehensive landscaping proposed are included for the proposed development including a range of facilities for children of different ages, parents and the elderly. A vibrant and multi-functional open space is provided within the scheme which benefits from safety, free from cars, and passive surveillance and can provide a space that offers small children's play area, and leisure areas for all ages. A series of nature-based play spaces express a new direction in early learning environments and provide a range of diverse and flexible play spaces which lead to tactile experiences and nature play without ever prescribing the use of the areas.
Policy Objective CA18: Urban Greening It is a Policy Objective to retain and promote urban greening - as an essential accompanying policy to compact growth - which supports the health and wellbeing of the living and working population, building resilience to climate change whilst ensuring healthy placemaking. Significant developments shall include urban greening as a fundamental element of the site and building design incorporating measures such as high quality biodiverse landscaping (including tree planting), nature based solutions to SUDS and providing attractive routes and facilities for the pedestrian and cyclist (Consistent with RPO 7.6, 7.22, 7.23, 9.10 of the RSES).	It is submitted that the proposed layout addressed existing features of the subject site, such as numerous mature trees and links to Rockfield Park. The applicant provides over 25% public open space, an extension of Rockfield Park and communal open space exceeding minimum requirements. Biodiversity mitigation measures and enhancements well as SUDS and extensive new tree planting have been proposed. The subject site is fully permeable and well connected to existing pedestrian and cycling infrastructure.
Policy Objective T11: Walking and Cycling It is a Policy Objective to secure the development of a high quality, fully connected and inclusive walking and cycling network across the County and the integration of walking, cycling and physical activity with placemaking including public realm permeability improvements. (Consistent with NPO 27 and 64 of the NPF and RPO 5.2 of the RSES)	The subject site and proposed development will actively promote the use of sustainable transport patterns. A total of 414 no. residential apartment units are proposed and a total of 244 no. car parking spaces out of which 236 no. spaces serve residential unit are proposed which results in a residential car parking ratio of 0.57. There will be an additional 962 cycling spaces. The proposed car parking spaces are appropriate for the subject site having regard to the policies of the NPF, the SRSCG's that wish to minimise, substantially reduce / wholly eliminate car parking in residential development. Also, we highlight that the subject site is within walking distance of the core city centre and has access to a variety of public transport modes, all in line with this policy objective.
Policy Objective T18: Car Sharing Schemes It is a Policy Objective to support the set up and operation of car sharing schemes to facilitate an overall reduction in car journeys and car parking requirements.	It is submitted that no car sharing scheme is proposed in the subject development due to a lack of interest of potential operators to be located in private development schemes. However, there are car sharing schemes available in Blackrock within a walking distance.

Table 3.9 - LDP Policy Objectives and Response

3.4.10 Site Background

The site contains three Protected Structures; 'St.Teresa's House' and its associated Entrance Gate, which has been relocated (RPS reference: no. 398 for both structures) and 'St. Teresa's Gate Lodge' (RPS reference: no. 1960). There are no national monuments situated on or adjacent to the site.

There are no internationally or nationally designated ecological sites at or adjacent to the Proposed Development site. The nearest European designated site is the South Dublin Bay Special Area of Conservation (SAC) (000210) and South Dublin Bay and River Tolka Estuary Special Protection Area (SPA) (004024), located approximately 0.3km to the north of the site. Similarly, the nearest nationally designated site is the South Dublin Bay proposed Natural Heritage Area (pNHA) (000210), located approximately 0.3km to the north of the site.

The nearest national monument is an unclassified castle (SMR no. DU023-008) located approximately 0.1km to the north of the site at its nearest point. Moreover, there are no architectural heritage sites located on or adjacent to the site. The nearest architectural heritage sites are the Rockfield House Gate Lodge (NIAH no. 60230087) and the Rockfield House Gateway (NIAH no. 60230088), located approximately 0.2km to the southeast of the site at its nearest point.

The site does not lie within any landscape Character Areas identified by the Dún Laoghaire-Rathdown County Development Plan 2022-2028 (DLRCDP). Two public areas from which there is a View and/or Prospect worthy of protection in line with the DLRCDP are located approximately 0.4KM north-northwest and 0.7KM North-Northeast of the site. These two public areas overlook the view of Dublin Bay and are therefore not affected by the location of the site. The site does not contain and is not adjacent to any public rights of way outlined within the DLRCDP.

The Carysfort-Maretime Stream (EPA River Waterbody Code: IE_EA_09B130400) flows approximately 20m from the western section of the near St. Louise's Park. This stream discharges to the South Dublin Bay approximately 0.4km to the north of the site. The western section of the site lies within Flood Zone A and Flood Zone B of the DLRCDP given its close proximity to the Carysfort-Maretime Stream. These zones represent a high probability of flooding from rivers (>1% probability) and from the coast (>0.5%), and a moderate probability of flooding from rivers (>1%) and from the coast (>0.5%) respectively.

The site does not lie within or adjacent to any designated geological heritage sites. The soil underlying the site is classified by the EPA (2025) as Urban. The underlying subsoils in the northern and western sections of the site are classified as Made (i.e. Man-made concreted or artificial surface) (EPA, 2025). The subsoils underlying the southern and eastern sections of the site are classified as tills derived from limestones (Code: TLs). The bedrock geology underlying the site is classified as Type 2p microcline porphyritic, which is described as granite with microcline phenocrysts (GSI, 2025).