

**DOWNEY**

29 Merrion Square, D02RW64

# **PLANNING STATEMENT & STATEMENT OF CONSISTENCY**

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**Proposed Modifications to  
Permitted Development LRD6057/24-S3A**

**Lands at 23-28 Prussia Street, Dublin 7**

**Applicant: Randalswood Construction Ltd.**

January 2026

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## PART A – PLANNING STATEMENT

### 1.0 INTRODUCTION

DOWNEY, Chartered Town Planners, 29 Merrion Square, Dublin 2, D02 RW64, have prepared this LRD planning statement and statement of consistency report on behalf of our client and the applicant, Randalswood Construction Ltd., to support a planning application for proposed modifications to a previously permitted Large-scale Residential Development (LRD) granted under planning permission Reg. Ref. LRD6057/24-S3A on lands at 23 - 28 Prussia Street, Dublin 7. The proposed development, as per the statutory notices, is to provide for the following:

*“We, Randalswood Construction Ltd., intend to apply for permission for development on lands at 23-28 Prussia Street, Dublin 7 (D07 X9X6, D07 FW30 & D07 PAF1), (located at the junction of Prussia Street and St. Joseph’s Road, and bounded by No. 29 Prussia Street (Protected Structure) to the north, No. 22 Prussia Street to the south, and TU Dublin, Grangegorman Campus and boundary wall (Protected Structure) to the east). The development will consist of proposed modifications to the previously permitted Large-scale Residential Development (LRD) (permitted under planning permission Reg. Ref. LRD6057/24-S3A) including modifications to the previously permitted total number of apartments (102 no. permitted units i.e. 49 no. 1 beds, 48 no. 2 beds, 4 no. 3 beds, and 1 no. 4 bed in 3 no. blocks, to now provide a total of 110 no. proposed units i.e. 68 no. 1 beds, 39 no. 2 beds, 2 no. 3 beds, and 1 no. 4 bed in 3 no. blocks), with modifications to internal layouts, elevations and unit mix of Block B, a permitted building ranging from 4-6 storeys over partial small basement (i.e. 4-7 storeys) in height, from a total of 29 no. permitted apartments comprising of 19 no. 1 beds, 8 no. 2 beds and 2 no. 3 beds to now provide a total of 32 no. proposed apartments comprising of 23 no. 1 beds and 9 no. 2 beds, and all apartments provided with private balconies/terraces to north, south, east and west elevations; and modifications to internal layouts, elevations and unit mix of Block C, a permitted building ranging from 7-8 storeys in height, from a total of 48 no. permitted apartments comprising of 19 no. 1 beds and 29 no. 2 beds to now provide a total of 53 no. apartments comprising of 34 no. 1 beds and 19 no. 2 beds, and all apartments provided with private balconies/terraces to south, east and west elevations; reconfiguration of the permitted bicycle parking to now provide 224 no. bicycle spaces including spaces at undercroft, surface and on Prussia Street; and all associated site works necessary to facilitate this development. The planning application may be inspected or purchased at a fee not exceeding the reasonable cost of making a copy, at the offices of Dublin City Council during its public opening hours. The application may also be inspected online at the following website set up by the applicant: [www.prussiastreetrevisionslrd.ie](http://www.prussiastreetrevisionslrd.ie)”*

The proposed modifications to the permitted LRD6057/24-S3A involve the reconfiguration of the internal floor plates within the building structure of Blocks B and C only resulting in changes to the apartment numbers and mix of the development. The modifications to the apartments and overall mix align with the most recently adopted apartment guidelines ‘*Planning Design Standards for Apartments Guidelines for Planning Authorities (2025)*’. The development will further include minor changes to the elevations to reflect the newly revised internal floor plans and apartment numbers and

mix alterations. For further information on these proposed modifications, please refer to the enclosed drawings and documentation prepared by C+W O’Brien Architects.

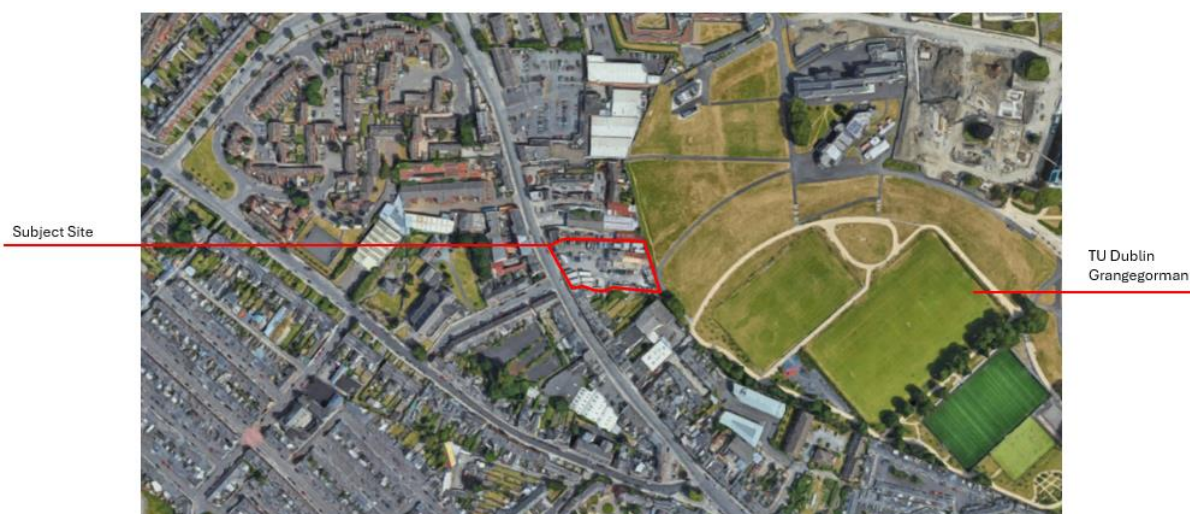
For details on the original design intent and overall approach for the entirety of the permitted scheme, please refer to the architectural drawings, Architectural Design Statement, and the landscape architectural drawings and associated Landscape Report submitted as part of the permitted scheme application under Reg. Ref. LRD6057/24-S3A, as granted by Dublin City Council.

It is hereby submitted that the proposal of additional 8 units to now provide 110 no. apartments will continue to offer an efficient use of land on this infill site in inner City Dublin, adjacent to a third level institute, TU Dublin Grangegorman Campus. The development subject to the proposed modifications application and as previously recognised by Dublin City Council, provides an ideal opportunity for residential development and is compatible with the existing built environment of the area. Given the site’s strategic location, it is considered that the proposed modifications to the previously permitted scheme provide for an appropriate density and takes into consideration the emerging context of the wider Grangegorman area, which is an assigned Strategic Development Regeneration Area (SDRA).

This planning statement sets out the planning rationale and justification for the proposed modifications to the apartment mix and overall unit numbers and demonstrates how it accords with the proper planning and sustainable development of the area. This report should be read in conjunction with the plans, drawings and documentation submitted as part of this planning pack and with that previously permitted under LRD6057/24-S3A.

## **2.0 SITE LOCATION AND DESCRIPTION**

The subject site is located to the east side of Prussia Street (Nos. 23-28) opposite the junction with St. Joseph’s Road. The site is a skewed rectangle in shape, which extends to approximately 0.38 hectares and fronts onto Prussia Street. It is bound to the north by No. 29 Prussia Street (a Protected Structure) and a car repair centre, and by residential dwellings to the south. The TU Dublin Grangegorman Campus is adjacent the subject site to the east, with the stone boundary wall of the campus forming the east (rear) boundary of the site.



*Figure 1: Aerial Photograph of the Application Site (Subject lands approx. outlined in red)*

The application site comprises brownfield lands, which contain several sheds and structures, the remnants of the ground floor frontage of nos. 24 and 25 and no. 23 Prussia Street, a 2-storey, end of terrace property which includes a ground floor commercial unit. The site was in use as a car wash and auto repair centre but has been vacant for some time now. It is proposed to demolish the existing structures on site in order to facilitate the permitted scheme, now subject to these proposed modifications. The lands have been in mixed commercial use for several decades, previously serving as the location of a terrace of Georgian houses.



*Figure 2: Street view of application site from Prussia Street*

This site is strategically positioned within an area of the city centre that is well connected, enjoys excellent access to the road network, and will see significant re-development in the coming years (including the 'Blanchardstown to City Centre CBC' and mobility measures aiming to provide a safer cycle infrastructure and to encourage more sustainable travel modes, i.e., cycling, walking). There are permitted developments in the vicinity of the subject site (mainly student accommodation) which also promote pedestrian and cycling connectivity throughout the area, some of which are now under construction.



Figure 3: Overview of the amenities within the surrounding area of the subject lands

The wider surrounding area is primarily low-rise residential in nature with some local commercial and retail uses. Further car repair and maintenance businesses are situated to the north of the application site, with recently constructed residential buildings located opposite the site to the west side of the street, and residential and commercial buildings, some of which are of Georgian character, fronting Prussia Street to the south.

The emerging context of this Inner-City area is that of higher rise and higher density development in line with National policy. The re-development of the Park Shopping Centre including the provision of student accommodation has been permitted by An Bord Pleanála (now An Coimisiún Pleanála), which has been detailed within the Planning History of this report.

The TU Dublin Grangegorman Campus is undergoing significant development, with several new buildings already constructed and others permitted and due to commence. This campus provides readily available services to the area, including employment, educational, commercial and community facilities, including large areas of open space in the vicinity of the site. As part of the TU Dublin Grangegorman Campus development, a Grangegorman campus gateway/public plaza area is to be developed linking the campus to Prussia Street. This proposal forms part of the overall permitted scheme on the application site.

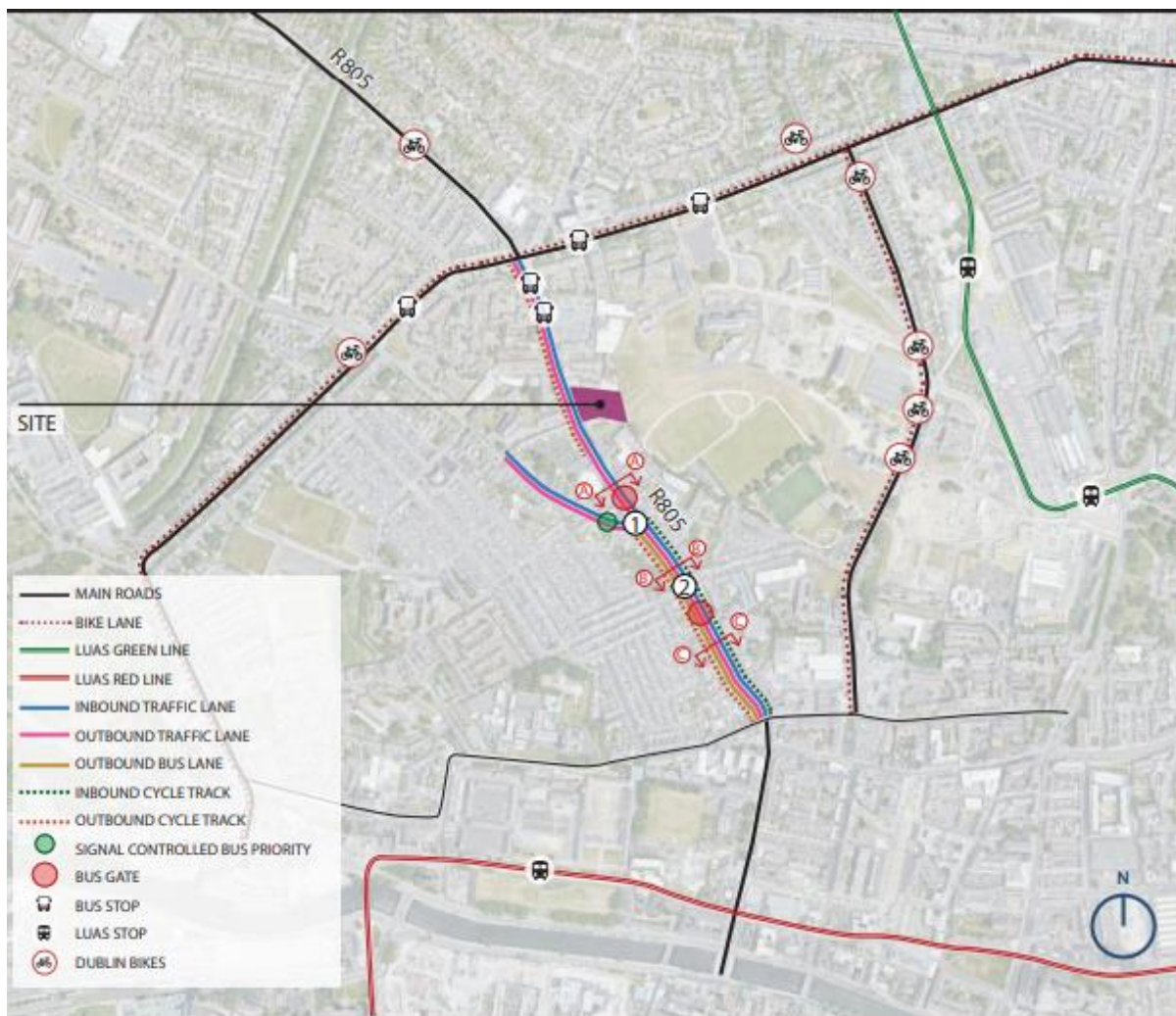


Figure 4: Overview of transport links with the subject lands

In light of the above, it is evident that the subject site is well served by a wide range of existing social, educational, employment and community facilities and is well located in terms of proximity to large retail centres and existing high-quality public transport. This level of infrastructure is considered sufficient to support the additional units now proposed and indeed the injection of population as a result of the permitted development will help sustain the long-term viability of this social infrastructure.

### 3.0 PLANNING HISTORY

DOWNEY have carried out an examination of the planning history of the subject site which determined that there have been a number of planning applications made on the subject lands. The most relevant planning history is as follows:

**Subject Site:**

**Reg. Ref. LRD6057/24-S3A:** By order dated 9<sup>th</sup> April 2025, the Dublin City Council granted permission to Randalswood Construction Ltd. for the following: *PROTECTED STRUCTURE: Permission for Large-scale Residential Development on lands at 23-28 Prussia Street, Dublin 7 (D07 X9X6, D07 FW30 & D07 PAF1), (located at the junction of Prussia Street, and St. Joseph's Road, and bounded by No. 29 Prussia*

Street (Protected Structure) to the north, No., 22 Prussia Street to the south, and TU Dublin, Grangegorman Campus and boundary wall (Protected Structure) to the east). The development will consist of the demolition of all existing structures on site including No. 23 Prussia Street (a two-storey terraced house with commercial use on the ground floor) and the remnants of the facades of Nos. 24 & 25 Prussia Street, and the construction of a residential development of 102 no. apartments (49 no. 1 beds, 48 no. 2 beds, 4 no. 3 beds, and 1 no. 4 bed) in 3 no. blocks, with a café/restaurant unit, to be provided as follows: Block A containing a total of 25 no. apartments comprising of 11 no. 1 beds, 11 no. 2 beds, 2 no. 3 beds, and 1 no. 4 bed, in a building ranging from 3-5 storeys in height, and all apartments provided with private balconies/terraces to north, south, east and west elevations. Block A also provides for a café/restaurant unit at ground floor level with associated signage; Block B containing a total of 29 no. apartments comprising of 19 no. 1 beds, 8 no. 2 beds and 2 no. 3 beds with a small plant basement, in a building ranging from 4-6 storeys over partial basement (i.e. 4-7 storeys) in height, and all apartments provided with private balconies/terraces to north, south, east and west elevations; Block C containing a total of 48 no. apartments comprising of 19 no. 1 beds and 29 no. 2 beds, in a building ranging from 7-8 storeys in height, and all apartments provided with private balconies/terraces to south, east and west elevations. The development also includes the construction of bin stores; 226 no. bicycle spaces including spaces at undercroft, surface and on Prussia Street; a gated vehicular servicing access on Prussia Street with minor remedial works to existing footpath; landscaping including two communal courtyards with play equipment and upgrades to public realm including provision of Grangegorman Campus Gateway with associated remedial works to existing footpath including retractable bollards to facilitate controlled vehicular access in this zone; remedial works to existing Grangegorman Campus boundary wall to the east (Protected Structure) including removal of sections of existing concrete coping on top of the existing stone wall and the removal of a section of the wall to provide entrance pillars to facilitate the provision of the primary pedestrian and cycle access route from TU Dublin, Grangegorman Campus to Prussia Street in accordance with the Grangegorman SDZ Plan; 1 no. ESB sub-station; public lighting; boundary treatments; and all associated engineering and site works necessary to facilitate the development.

**This permitted development is now subject to the proposed modifications of this application.**

**Reg. Ref. GSDZ4210/24:** By order dated 6<sup>th</sup> August 2025, Dublin City Council granted planning permission for a temporary haul route consisting of the following: *“PROTECTED STRUCTURE: Grangegorman Development Agency intends to apply for permission for development at this site within the TU Dublin Grangegorman Campus, Grangegorman Lower, Dublin 7, located to the rear of nos. 23 and 24 Prussia Street Stoneybatter, Dublin 7, DO7 FW30. The site is located within the Grangegorman Strategic Development Zone. The development will consist of: the demolition of a section of the Grangegorman Strategic Development Zone boundary wall (a protected structure, RPS ref. 1674) and remedial works, including the provision of new entrance pillars, and the provision of utilities connections to the existing network within the Grangegorman Strategic Development Zone to facilitate the provision of a temporary construction traffic haul route alongside a temporary pedestrian and bicycle link between the Grangegorman Strategic Development Zone site and Prussia Street via the adjoining site at nos. 23 and 24 Prussia Street. This temporary link will include 2.5m high manually operated steel security gates at either end and a 2.0m high paladin mesh fence to segregate the temporary haul route from the temporary pedestrian and bicycle link. A separate, concurrent planning application for permission has been lodged for the portion of the development that is located outside of the Strategic Development Zone and will consist of: the demolition of an existing, vacant, 2-storey*

*dwelling at no. 23 Prussia Street (c. 75sqm) and associated remedial works to the northern gable of no. 22 Prussia Street on lands within the applicant's ownership; demolition of the ground floor façade and other remnants of the former dwelling at no. 24 Prussia Street; and general site clearance to provide a temporary construction traffic haul route alongside a temporary pedestrian and bicycle link between Prussia Street and the Grangegorman Strategic Development Zone. A permanent pedestrian and bicycle link to replace the proposed temporary construction traffic haul route and temporary pedestrian and bicycle link will be provided through the site, subject to separate planning permission."*

This was a concurrent application with Reg. Ref. 4211/24.

**Reg. Ref. 4211/24:** By order dated 10<sup>th</sup> September 2025, Dublin City Council granted planning permission for a temporary haul route consisting of the following: *"PROTECTED STRUCTURE: Grangegorman Development Agency intends to apply for permission for development at this site at nos. 23 and 24 Prussia Street and lands to the rear, Stoneybatter, Dublin 7, D07 FW30. The development will consist of: the demolition of an existing, vacant, 2-storey dwelling at no. 23 Prussia Street (c. 75sqm) and associated remedial works to the northern gable of no. 22 Prussia Street on lands within the applicant's ownership; demolition of the ground floor façade and other remnants of the former dwelling at no. 24 Prussia Street; and general site clearance to provide a temporary construction traffic haul route alongside a temporary pedestrian and bicycle link between Prussia Street and the Grangegorman Strategic Development Zone site to facilitate permitted works within the Grangegorman Strategic Development Zone. This temporary link will include 2.5m high manually operated steel security gates at either end and a 2.0m high paladin mesh fence to segregate the temporary haul route from the temporary pedestrian and bicycle link. The proposed temporary link will also include associated drainage, utilities, lighting, CCTV, boundary treatments and all associated site development works. Part of the proposed development site comprises a section of the Grangegorman Strategic Development Zone boundary. A separate, concurrent planning application for permission has therefore been submitted for the portion of the development that is located within the Grangegorman Strategic Development Zone which is subject to the provisions under Section 170 of the Planning and Development Act 2000 (as amended) and which will consist of the partial demolition of the boundary wall (a protected structure, RPS ref, 1674) and remedial works to the wall, including the provision of new entrance pillars, facilitating the temporary link between the Grangegorman Strategic Development Zone and Prussia Street. A permanent pedestrian and bicycle link to replace the proposed temporary construction traffic haul route and temporary pedestrian and bicycle link will be provided through the site, subject to separate planning permission."*

The permitted LRD scheme has had cognisance of the proposals as submitted under Reg. Ref. GSDZ4210/24 and Reg. Ref. 4211/24 which have been submitted as two concurrent applications for permission for a temporary haul route. Discussions have been held and are ongoing with the Grangegorman Development Agency regarding the proposals, as the applicant in this case is preparing planning compliances and construction packages for the permitted scheme. The Grangegorman Development Agency and the applicant are committed to delivering the public realm works/Grangegorman access from Prussia Street as a key objective of the Grangegorman SDZ Planning Scheme.

***For further details on planning history for the subject site, we respectfully refer Dublin City Council to planning permission Reg. Ref. to LRD6057/24-S3A.***

## 4.0 DEVELOPMENT DESCRIPTION

The project is described, as per the planning application statutory notices, as the following:

*“We, Randalswood Construction Ltd., intend to apply for permission for development on lands at 23-28 Prussia Street, Dublin 7 (D07 X9X6, D07 FW30 & D07 PAF1), (located at the junction of Prussia Street and St. Joseph’s Road, and bounded by No. 29 Prussia Street (Protected Structure) to the north, No. 22 Prussia Street to the south, and TU Dublin, Grangegorman Campus and boundary wall (Protected Structure) to the east). The development will consist of proposed modifications to the previously permitted Large-scale Residential Development (LRD) (permitted under planning permission Reg. Ref. LRD6057/24-S3A) including modifications to the previously permitted total number of apartments (102 no. permitted units i.e. 49 no. 1 beds, 48 no. 2 beds, 4 no. 3 beds, and 1 no. 4 bed in 3 no. blocks, to now provide a total of 110 no. proposed units i.e. 68 no. 1 beds, 39 no. 2 beds, 2 no. 3 beds, and 1 no. 4 bed in 3 no. blocks), with modifications to internal layouts, elevations and unit mix of Block B, a permitted building ranging from 4-6 storeys over partial small basement (i.e. 4-7 storeys) in height, from a total of 29 no. permitted apartments comprising of 19 no. 1 beds, 8 no. 2 beds and 2 no. 3 beds to now provide a total of 32 no. proposed apartments comprising of 23 no. 1 beds and 9 no. 2 beds, and all apartments provided with private balconies/terraces to north, south, east and west elevations; and modifications to internal layouts, elevations and unit mix of Block C, a permitted building ranging from 7-8 storeys in height, from a total of 48 no. permitted apartments comprising of 19 no. 1 beds and 29 no. 2 beds to now provide a total of 53 no. apartments comprising of 34 no. 1 beds and 19 no. 2 beds, and all apartments provided with private balconies/terraces to south, east and west elevations; reconfiguration of the permitted bicycle parking to now provide 224 no. bicycle spaces including spaces at undercroft, surface and on Prussia Street; and all associated site works necessary to facilitate this development. The planning application may be inspected or purchased at a fee not exceeding the reasonable cost of making a copy, at the offices of Dublin City Council during its public opening hours. The application may also be inspected online at the following website set up by the applicant: [www.prussiastreetrevisionslrd.ie](http://www.prussiastreetrevisionslrd.ie)”*

It is considered that the proposed modifications to the permitted scheme will continue to be beneficial for Prussia Street, the TU Dublin Grangegorman Campus and the surrounding environs, and the site represents an ideal location for residential development which enjoys the provision of a wide range of services, employment opportunities and is adjacent to a third level campus within this inner urban area.

A breakdown of the key characteristics of the proposed development is as follows:

*Table 1: Breakdown of the key characteristics of the proposed development*

SUMMARY OF KEY CHARACTERISTICS		
<b>NO. OF APARTMENT UNITS (i.e. proposed modifications to Blocks B &amp; C only, with Block A remaining as permitted)</b>	1 BEDROOM UNITS	68
	2 BEDROOM UNITS	39
	3 BEDROOM UNITS	2
	4 BEDROOM UNITS	1

<b>TOTAL NO. OF APARTMENT UNITS</b>	110 (102 permitted, 8 additional now proposed)
<b>TOTAL NO. OF BEDROOMS</b>	157
<b>TOTAL DEVELOPMENT GROSS INTERNAL FLOOR AREA (m<sup>2</sup>)</b>	8,450
<b>TOTAL RESIDENTIAL NET FLOOR AREA (m<sup>2</sup>)</b>	6,577
<b>TOTAL SITE AREA (HECTARES)</b>	0.38
<b>BUILDING FOOTPRINT ON GF (m<sup>2</sup>)</b>	1,563
<b>DEVELOPMENT SITE COVERAGE</b>	43%
<b>DENSITY (UNITS PER HECTARE)</b>	292
<b>DEVELOPMENT PLOT RATIO</b>	2.2
<b>TOTAL COMMUNAL OPEN SPACE AREA (m<sup>2</sup>)</b>	800
<b>% OF OPEN SPACE (m<sup>2</sup>)</b>	21%
<b>TOTAL CAR PARKING SPACES PROVIDED</b>	0
<b>TOTAL BICYCLE SPACES</b>	224
<b>TOTAL NO. OF SINGLE ASPECT UNITS</b>	58
<b>% NO. OF SINGLE ASPECT UNITS</b>	52%
<b>TOTAL NO. OF DUAL ASPECT UNITS</b>	52
<b>% NO. OF DUAL ASPECT UNITS</b>	48%
<b>APARTMENTS BUILDING HEIGHT</b>	4 to 8 storeys (Blocks B&C)



Figure 5: Extract of Proposed Site Layout Plan

The layout of the permitted scheme has been developed as a result of the collaborative work of the design team. The permitted design breaks the scheme into three key elements. Each of the three main sections is of a different height. The height gradually increases from west to east, in recognition of the physical transition of built context of both Prussia Street and the Grangegorman campus. The first main section of the building facing Prussia Street is primarily 3-to-5 storeys, the middle element is permitted as 4-to-6 storeys with 7-8 storeys along the eastern boundary, fronting onto the Grangegorman Campus. This will remain unchanged from that previously permitted under Reg. Ref. LRD6057/24-S3A.

As previously permitted under Reg. Ref. LRD6057/24-S3A, all permitted units were designed in accordance with the pertaining Development Plan standards and ‘Sustainable Urban Housing: Design Standards for New Apartments’ Guidelines in place at the time, complying with or exceeding the minimum standards by at least 10% as per the aforementioned Guidelines.

Since the granting of LRD6057/24-S3A, an updated version of the *Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025)* has been released. As such, it is the applicant’s intention to apply for proposed modifications to the permitted development. The applicant’s intent with this application is to modify the granted apartment unit mix from 102 no. units (49 no. 1 beds, 48 no. 2 beds, 4 no. 3 beds, and 1 no. 4 bed) to instead provide 110 no. units (68 no. 1 beds, 39 no. 2 beds, 2 no. 3 beds, and 1 no. 4 bed) - the proposed increased units is to align with the most recent National Policy Guidelines ‘*Design Standards for Apartments, Guidelines for Planning Authorities*’.

The proposed alterations to LRD6057/24-S3A will include the following:

- The reconfiguration of the internal floor plates within the permitted building structure of Blocks B and C only;
- Alterations to the apartment numbers and mix of permitted Block B and Block C only;
- Minor alterations to onsite bicycle parking; and
- Minor alterations to the elevations to reflect the internal floor plate and apartment numbers and mix alterations to Blocks B and C only.

The proposed apartment mix, which will provide for a total of 110 no. apartment units, complies with the requirements of the most recent guidelines. There will be no adverse impacts on the amenities of existing or future residents as the proposed revised apartment mix complies with the applicable guidelines and standards for apartment living. The revised apartment mix will meet the criteria of the guidelines through mix ratio, internal space standards, dual aspect ratio and floor to ceiling height. We invite the Planning Authority to refer to the Housing Quality Assessment (HQA) and Schedule of Accommodation (SOA) prepared by C + W O’Brien Architects, submitted under separate cover of this application for further information in this regard.

All apartment units within the proposed development have been provided with adequately sized balconies or patios and terraces which have been designed in accordance with quantitative and qualitative standards, and which have been provided with appropriate treatments to ensure privacy and security. Please refer to the enclosed Schedule of Accommodation prepared by C + W O’Brien Architects which sets out the private and semi-communal open space provided within each block.

To ensure that the development has had an appropriate response to its surrounding setting, an updated Daylight and Sunlight Analysis was conducted by Digital Dimensions which was completed

based on the revised apartment mix and internal layout of the development, this is submitted under separate cover of this application. Such as that previously permitted under Reg. Ref. LRD6057/24-S3A, the Daylight and Sunlight Analysis has concluded that the proposed development ‘performs with regards to achieving the best possible daylight and sunlight quality. All habitable rooms meet the minimum standard for daylight provision as per BS EN 17037:2018+A1:2021 as referred to in the BRE guidelines BR209:2022 (third edition). In the assessment of daylight in accordance with IS EN 17037:2018, shown for supplementary information, the vast majority of habitable rooms achieve daylight provision as set out in IS EN 17037:2018. With regard to internal daylighting, Section 3.2 of the Urban Development and Building Heights: Guidelines for Planning Authorities (2018) states:

*“Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.”*

*It is our opinion that all habitable rooms within the proposed development achieve the minimum target daylight levels set out in BS EN 17037:2018+A1:2021, as referred to in the BRE guidelines BR209:2022 (third edition) and no compensatory measures are required’.*

Please refer to the plans, sections, and elevations drawings prepared by C + W O’Brien Architects for further details on the unit mix layout and design. Please also refer to the Architectural/Urban Design Statement prepared by C + W O’Brien Architects for a detailed overview of the proposed revised changes to the permitted apartment mix and justifications for these choices that have been implemented in the scheme. Overall, the proposed development will remain consistent with that previously permitted and form a distinctive new residential neighbourhood which is of a density and character that assimilates well to its location within walking distance of public transport nodes. For further details on the development scheme in its entirety, we respectfully refer Dublin City Council to planning permission Reg. Ref. LRD6057/24-S3A.



Figure 6: Extract of CGI prepared by Digital Dimensions

## 5.0 PLANNING CONTEXT

DOWNEY have prepared a separate Statement of Consistency with Planning Policy assessment that depicts how the proposal accords with planning policy from a national to regional level, and we invite the Planning Authority to refer to Part B of this document for a full comprehensive list of national, regional and local level policies and how the proposal accords with the proper planning and sustainable development of the area.

## 6.0 CONCLUSION

This Planning Report has been prepared by DOWNEY to accompany a planning application for proposed modifications to a previously permitted Large-scale Residential Development (LRD) granted under planning permission Reg. Ref. LRD6057/24-S3A on lands at nos. 23 - 28 Prussia Street, Dublin 7.

The applicant is committed to delivering a high-quality development at Prussia Street, with a diverse range of residential unit types, complemented by facilities for the enjoyment of residents that comply with National Guidelines and exhibit proper planning. For further details on the design approach for the scheme, please refer to the architectural drawings and Architectural/Urban Design Statement, which accompany this application.

It is considered that the proposed alterations to that previously permitted is a continued opportunity to deliver housing at this strategic location, adjacent to high-quality public transport and a wide range of existing social, community and physical infrastructure, which will help meet the ever-increasing demand for residential accommodation in the Greater Dublin Area. The proposed revisions will remain deliverable in the short term such as that previously permitted.

The Statement of Consistency detailed below demonstrates that the proposed development complies with the relevant national, regional, and local planning policy.

It is submitted that the proposed development is in accordance with the proper planning and sustainable development of the area in which it is located as expressed in national, regional and local planning policy and Guidelines issued under Section 28 of the Planning and Development, 2000 (as amended).

## PART B – STATEMENT OF CONSISTENCY

### 1.0 INTRODUCTION

DOWNEY, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this Statement of Consistency with Planning Policy, on behalf of our client and the applicant, Randalswood Construction Ltd. This statement accompanies a planning application for proposed modifications to that previously permitted for a Large-scale Residential Development (LRD) on lands at 23-28 Prussia Street, Dublin 7.

The project is described, as per the planning application statutory notices, as follows:

*“We, Randalswood Construction Ltd., intend to apply for permission for development on lands at 23-28 Prussia Street, Dublin 7 (D07 X9X6, D07 FW30 & D07 PAF1), (located at the junction of Prussia Street and St. Joseph’s Road, and bounded by No. 29 Prussia Street (Protected Structure) to the north, No. 22 Prussia Street to the south, and TU Dublin, Grangegorman Campus and boundary wall (Protected Structure) to the east). The development will consist of proposed modifications to the previously permitted Large-scale Residential Development (LRD) (permitted under planning permission Reg. Ref. LRD6057/24-S3A) including modifications to the previously permitted total number of apartments (102 no. permitted units i.e. 49 no. 1 beds, 48 no. 2 beds, 4 no. 3 beds, and 1 no. 4 bed in 3 no. blocks, to now provide a total of 110 no. proposed units i.e. 68 no. 1 beds, 39 no. 2 beds, 2 no. 3 beds, and 1 no. 4 bed in 3 no. blocks), with modifications to internal layouts, elevations and unit mix of Block B, a permitted building ranging from 4-6 storeys over partial small basement (i.e. 4-7 storeys) in height, from a total of 29 no. permitted apartments comprising of 19 no. 1 beds, 8 no. 2 beds and 2 no. 3 beds to now provide a total of 32 no. proposed apartments comprising of 23 no. 1 beds and 9 no. 2 beds, and all apartments provided with private balconies/terraces to north, south, east and west elevations; and modifications to internal layouts, elevations and unit mix of Block C, a permitted building ranging from 7-8 storeys in height, from a total of 48 no. permitted apartments comprising of 19 no. 1 beds and 29 no. 2 beds to now provide a total of 53 no. apartments comprising of 34 no. 1 beds and 19 no. 2 beds, and all apartments provided with private balconies/terraces to south, east and west elevations; reconfiguration of the permitted bicycle parking to now provide 224 no. bicycle spaces including spaces at undercroft, surface and on Prussia Street; and all associated site works necessary to facilitate this development. The planning application may be inspected or purchased at a fee not exceeding the reasonable cost of making a copy, at the offices of Dublin City Council during its public opening hours. The application may also be inspected online at the following website set up by the applicant: [www.prussiastreetrevisionslrd.ie](http://www.prussiastreetrevisionslrd.ie)”*

This Statement of Consistency with Planning Policy has been prepared in accordance with the requirements of the Planning and Development Act and associated Regulations (as amended).

This Statement demonstrates that the proposed development is consistent with the relevant national, regional and local planning policy and guidelines issued under Section 28 of the Planning and Development Act, 2000 (as amended). This Statement should be read in conjunction with the accompanying detailed documentation prepared by the design team.

For details of compliance with the quantitative standards for residential units of adopted *'Sustainable Urban Housing: Design Standards for New Apartments (2025)'*, *'Quality Housing for Sustainable Communities Best Practice Guidelines for Delivering Homes Sustaining Communities'* and the *Dublin City Development Plan 2022 - 2028*, please refer to the Housing Quality Assessment and Schedule of Accommodation prepared by C + W O'Brien Architects which is included as part of the architectural drawing pack.

## 2.0 NATIONAL POLICY AND GUIDELINES

The key provisions of the national planning policy, including Section 28 Guidelines, as it relates to the proposed development are now set out in the following sections. The key national policy and guidance documents of relevance include:

- Project Ireland 2040: National Planning Framework, First Revision (2025)
- Delivering Homes, Building Communities 2025-2030
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)
- Planning Design Standards for Apartments, Guidelines for Planning Authorities (July 2025)

### 2.1 Project Ireland 2040: National Planning Framework First Revisions (2025)

The National Planning Framework (NPF) is “the Governments high-level strategic plan for shaping the future growth and development of our country out to the year 2040.” It is a Framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment- from our villages to our cities and everything in between. It is stated within the NPF that “people in Ireland have a strong connection with rural areas for a number of different reasons. For some, it is the place in which they have chosen to live and work, where the land not only provides a home, but also provides an income.”

The NPF outlines a number of strategies and policy objectives, emphasising upon the issue of compact growth and urban consolidation. Specifically in terms of ‘compact growth’, the NPF targets for up to 40% of all new future housing developments to be within and close to the existing footprint of built-up areas. It seeks to make use of under-utilised land and buildings, including infill, brownfield, publicly owned, vacant sites and that of under-occupied buildings.

The National Strategic Outcome 1 of Compact Growth pursues a compact growth policy at national, regional and local level to provide for greater residential development within the existing built-up areas of Irelands cities, towns and villages, providing for housing variety and sustainable development. The mechanisms employed to achieve this National Strategic Outcome aim to achieve some of the following within urban areas:

- Enable urban infill development that would not otherwise occur;
- Improve ‘liveability’ and quality of life, enabling greater densities of development to be achieved;
- Ensure transition to more sustainable modes of travel (walking, cycling, public transport) and energy consumption (efficiency, renewables) within an urban context;

The proposed additional 8 units to now provide 110 apartment units, subject to this application, will result in much needed infill development, providing a high quality and considered design of urban infill apartments. The apartments ensure transition to sustainable modes of transport with the provisions of bicycle parking only due to the central city location within Dublin. The subject site is located within a connectivity area for public transport with access to the Dublin Bus System, the Red Luas Line and Dublin Hueston Station, providing access to Irish Rail. The proposed development is an expressive example of appropriate infill development, good design and proper planning; the development further contributes to much needed housing within the Dublin area.

The NPF explicitly supports the densification of vacant sites, such as the subject site and those similar, this is outlined by **National Policy Objective 45**, which states:

*“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 and increasing building heights”.*

The NPF contains a number of National Policy Objectives (NPOs) which are relevant to this planning submission. These NPOs are the following:

**National Policy Objective 4:** *A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.*

**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 12:** *Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.*

**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 42:** *To target the delivery of housing to accommodate approximately 50,000 additional homes 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 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 considered that planning permission for the proposed residential development of 8 additional units providing a total of 110 apartments is consistent with the National Planning Framework (First Revisions) National Policy Objectives, as outlined above. The proposed residential infill development will contribute to the delivery of 40% of all new housing being located within existing footprint of existing settlements and will contribute to housing built within Dublin as one of the five cities. The design of the development is responsive to the immediate urban context, ensuring its character, size and scale is appropriate of the existing environment while still being an example of standalone architecture that is representative of modern needs and requirements including its examples of sustainable development at an appropriate scale. The proposed development will result in more central city living and allow for access to the surrounding city centre amenities and jobs access that Dublin City provides. The proposed development is an appropriate example of infill residential development and will respond to the needs of increased density within existing settlements.

The alterations to the apartment unit mix would offer the expedited construction of a greater number of dwellings within the Prussia Street Apartment Development to address the acute shortage of residential accommodation, help to address the rise of homelessness and help to address the rising cost of rental accommodation, apartment and housing affordability within Ireland addressing the key concerns as outlined in national policy.

DOWNEY is of the considered opinion that the proposed development has demonstrated and clearly aligns with the National Planning Framework (First Revisions) 2025, where it is an example of proper planning and sustainable development. The utilisation of the subject site for infill housing will contribute to greater environmental, social and economic outcomes, provide needed housing for the population of Dublin and make a positive contribution to the urban character of the city.

## **2.2 Delivering Homes, Building Communities 2025-2030**

Published on 13th November 2025, the Government has introduced a new housing plan to replace Housing for All. The new plan “Delivering Homes, Building Communities”, aims to speed up the delivery of new homes and tackle homelessness, building on the progress of the Housing for All plan. The Plan aims to deliver 300,000 new homes by the end of 2030, which includes 72,000 social homes and 90,000 affordable housing supports. The Plan is also backed by an unprecedented investment in water, energy, and transport infrastructure to assist in the delivery of these houses, with a total of €9 billion capital funding for housing in 2026 alone.

The Plan is based on two key pillars:

1. Activating the supply of 300,000 more homes; and
2. Supporting people to have a home of their own.

Pillar 1 “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 also identifies four key priorities to activate Pillar 1, which are as below:

1. Ensure a strong pipeline of zoned and serviced land is available.
2. Create the conditions to attract the required investment.
3. Increase skills and support the adoption of Modern Methods of Construction in the residential construction sector.
4. Work toward ending dereliction and vacancy.

With regards to Pillar 2, the Plan “details how Government will support people. It sets out a series of key actions that work towards ending homelessness, support affordability and address the housing needs of people as they progress through life. In partnership with local authorities, the LDA and AHBs, the Plan will address the needs of the most vulnerable in our communities, make buying and renting homes more affordable and support the development of villages, towns and cities across the country.”

The four key priorities to activate Pillar 2, are as follows:

1. Focus on ending homelessness, deliver homes for older people and support social inclusion.
2. Deliver an average of 12,000 new social homes every year over the lifetime of the Plan.
3. Promote affordable homeownership, protect renters and make buying and renting homes more affordable.
4. Invest in the built environment of towns, villages and cities across the country to enhance community well-being.

The Plan concludes noting that in order to achieve the objective set out, a “joined-up, long-term national effort” is required, noting that it is a shared responsibility to deliver on these targets.

The proposed development will continue to provide high density, sustainable residential development in close proximity to a high frequency bus network, LUAS line, and cycling infrastructure, all of which promotes compact urban growth and a good quality of life. Prussia Street is located between the Grangegorman and Stoneybatter areas of Dublin City, these have become attractive and vibrant areas for people to live and work in, supported by high-quality physical and social infrastructure as well as vast recreational amenities and the various sports clubs and centres within the area.

DOWNEY are of the considered opinion that the revised apartment mix as a part of the development scheme at Prussia Street will contribute to the Government’s targets through the construction of the 110 apartment units on the underutilised subject site. The construction of apartments is an essential part of housing infrastructure within Ireland and will contribute to residential housing options and availability. The provisions of the 110 residential units will be of an appropriate mix of unit types and sizes; all located within the designated Z1 – Sustainable Residential Neighbourhood zoning and within a small section of the site (southwestern corner) zoned Z2 – Residential Neighbourhoods (Conservation Areas) under the Dublin City Development Plan. It is submitted that the development is consistent with the current policy for Delivering Homes, Building Communities 2025-2030.

### **2.3 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)**

Adopted in January 2024, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, outlines national planning policies focuses on sustainable residential growth and development of compact settlements in both urban and rural areas. These

guidelines, which replace the 2009 Sustainable Residential Development in Urban Areas Guidelines, have been updated to reflect current government policies and broader economic, social and environmental considerations. They align with the NPF First Revisions and provide detailed guidance on settlement growth priorities, residential density, urban design and placemaking. Additionally, the guidelines introduced flexible development standards to support a wider range of housing options tailored to the specific context of various settlement sizes, from cities to smaller towns and villages.

The Sustainable Residential Development and Compact Settlement Guidelines set out policy and guidance in relation to planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements. They build on and update previous guidance to take account of current government policy and economic, social and environmental considerations.

The aim of the Guidelines is to set out the key planning principles which should be reflected in Development Plans and local area plans, and which should guide the preparation and assessment of planning applications for residential developments in urban areas. These Guidelines support higher residential densities particularly for sites within town centre locations and along public transport corridors, as it states: *“To achieve compact growth, it will also be necessary to increase the scale of new buildings in all parts of our cities and towns, with highest densities at the most central and accessible urban locations, particularly in city centres and close to public transport nodes and interchanges.”*

Development standards in the Guidelines are covered by SPPRs as follows in Table 2:

**Table 2: SPPR's For Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024)**

<b>Specific Planning Policy Requirements</b>	<b>Assessment</b>
<b>SPPR 1: Separation Distances</b>	<p><b>In compliance.</b></p> <p><i>A separation distance of 16.35m is achieved between Block B and Block C with opposing windows. No changes are proposed for Block A and the Café/Retail.</i></p> <p><i>No changes to the Block Placement are proposed to that previously granted under LRD6057/24-S3A and separation distances will remain unchanged.</i></p>
<b>SPPR 2 - Minimum Private Open Space Standards for Houses</b>	<p><b>In Compliance.</b></p> <p><i>Meets or exceeds private amenity space standards under the Planning and Design Standards for Apartments, Guidelines for Planning Authorities (2025).</i></p> <p><i>We respectfully invite Dublin City Council to review the drawings and HQA prepared by C + W O’Brien Architects.</i></p>
<b>SPPR 3 - Car Parking It is a specific planning policy requirement of these Guidelines</b>	<p><b>N/A</b></p> <p><i>No carparking proposed under that previously granted LRD6057/24-S3A.</i></p>

	<p><i>No carparking is proposed as part of this Modification to Permitted Residential Development application.</i></p>
<p><b>SPPR 4 - Cycle Parking and Storage</b></p>	<p><b><i>In compliance.</i></b></p> <p><i>224 bicycle parking spaces are provided. This includes undercroft bicycle parking for 162 spaces (of which no. 8 are cargo bikes spaces) and 62 visitor spaces (of which no. 4 are cargo bike spaces).</i></p>

The design of the proposed development has placed considerable emphasis on the context of the site and location as well as the surrounding built environment. The proposed development successfully incorporates the criteria of the ‘Urban Design Manual – A Best Practice Guide’ and remains unchanged from that previously permitted under LRD6057/24-S3A.

DOWNEY are of the considered opinion that the proposed development represents a development that has been carefully and appropriately designed, considering its neighbouring properties and will continue to integrate successfully with its environs. The alterations to the apartment mix now proposed will continue to integrate successfully with the surrounding environs and provide for additional needed housing to a high standard within a well-connected area. The SPPR’s have continued to be complied with and result in an example of proper planning.

It is submitted that the revised apartment mix proposed would be a positive addition to the surrounding built environment of Prussia Street and to the locality. Furthermore, it is considered that the proposed buildings will meet the aspirations of a range of people and the design and layout of such allows easy access by all. For further information on the proposed development’s consistency with the ‘Urban Design Manual’, please refer to that previously permitted under Reg. Ref. LRD6057/24-S3A and the revised drawings completed by C + W O’Brien Architects submitted under separate cover of this application.

## **2.4 Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025)**

Adopted in July 2025, the Planning Design Standards for Apartments Guidelines for Planning Authorities (2025), outlines national planning policies in relation to the design of apartment developments. These guidelines, which replace the 2018 Sustainable Urban Housing: Design Standards for New Apartments, which have been updated to reflect current government policies and broader economic, social and environmental considerations. They align with the NPF and provide detailed guidance on apartment mix, internal space standards, dual aspect ratios, floor to ceiling heights, apartment to stair/lift core ratio, storage spaces and amenity spaces. Additionally, the guidelines set out policy and guidance in relation to the planning and development of apartments in all housing or mixed-use developments that include apartments that may be available or for individual lease, or for rental purposes.

The Guidelines outline policies relating to:

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

The Guidelines these Guidelines apply to all housing or mixed-use developments that include apartments that may be made available for sale, whether for owner occupation or for individual lease, or for rental purposes.

The guidelines set out 8 SPPR’s to assist in the delivery of new developments, the SPPR’s have been outlined and assessed below in Table 3.

Table 3: Compliance with Specific Planning Policy Requirements

Specific Planning Policy Requirement	Compliance
<b>SPPR1 (Housing Mix)</b>	In Compliance. Internal floor area has been redesigned to comply with SPPR 1 unit mix.
<b>SPPR2 (Apartment Floor Areas)</b>	In Compliance. Apartment floor areas have been redesigned to satisfy SPPR 2.
<b>SPPR3 (Dual Aspect Ratios)</b>	In Compliance. Development in compliance with standards of SPPR 3.
<b>SPPR4 (Floor to Ceiling Heights)</b>	In Compliance. No change from previously permitted.
<b>SPPR5 (Stair and Lift Cores)</b>	In Compliance. No change from previously permitted.
<b>SPPR6 (Communal, Community and Cultural Facilities)</b>	In Compliance. No change from previously permitted.
<b>SPPR 7 (Shared Accommodation/Co-Living Developments)</b>	N/A. Not relevant to the development.
<b>SPPR 8 (Purposed Built Student Accommodation)</b>	N/A. Not relevant to the development.

DOWNEY are of the considered opinion that the proposed development complies with the SPPRs/requirements of the ‘Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025)’. This planning application includes a Housing Quality Assessment and a detailed daylight, sunlight, and internal light analysis report, in accordance with the Guidelines. The proposed development will help to meet the current demand for apartment type developments.

For further information in this regard, please refer to the enclosed architectural drawings and detailed Housing Quality Assessment prepared by C + W O’Brien Architects which provides confirmation that the proposed development is consistent with the design standards of these Guidelines.

### 3.0 REGIONAL POLICY AND GUIDELINES

The key provisions of the regional planning policy as it relates to the proposed development are now set out in the following sections. The key regional policy of relevance includes:

- Regional Spatial and Economic Strategy (Eastern & Midland Regional Assembly)

#### 3.1 Regional Spatial and Economic Strategy for the Eastern & Midland Region

The Regional Spatial and Economic Strategy (RSES) was published by the Eastern and Midland Regional Assembly. The RSES outlines the long-term regional level strategic planning and economic framework in support of the National Planning Framework for the period 2019-2031. The RSES identifies regional assets, opportunities, pressures and constraints and provides a framework for investment to better manage spatial planning and economic development throughout the Eastern & Midland Region. The RSES is tasked with the development of planning policy for future housing needs in the region upon consideration of the availability of land, resources, environment and infrastructure capacity.

In conjunction with the NPF, the RSES predicts *Dublin City and Suburbs* to experience continued population growth over the period 2019-2031 with a predicted increase of 220,000. The NPF targets 50% of all housing to be provided within or contiguous to the built-up area of Dublin city and suburbs. In order to combat and provide for compact residential development, the RSES outlines a number of key Regional Policy Objectives that pertain to the NPF targets. The key Regional Policy Objectives applicable to the development proposal are the following:

**Regional Policy Objective (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.”*

**Regional Policy Objective (RPO) 5.3** – *“Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.”*

The proposed development at Prussia Street is located on brownfield urban lands in an inner-city location which is highly accessible and provides for a high-density development in close proximity to a high frequency bus network, future BusConnects CBC, existing and planned cycling infrastructure. Therefore, it is considered that the proposed development is consistent with the aforementioned objectives and will further support sustainable travel patterns.

**Regional Policy Objective (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’.”*

It is submitted that the provision of a high-quality and high-density development consisting of 110 no. apartment units as proposed within this LRD planning application at Prussia Street will assist in achieving the aforementioned objective and it also complies with the pertaining policies and standards. For further details on how the proposed development is in accordance with this policy, please refer to the Housing Quality Assessment and Architectural/Urban Design Statement prepared by C + W O'Brien Architects which are included as part of the architectural planning packs.

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

The proposed scheme is located on existing zoned and serviced lands, adheres with the policies and objectives of the RSES for the Eastern & Midland Regional Assembly area and will provide a high-quality development which will further service and contribute to the re-development and consolidation of the area.

In relation to Settlement Strategies, Regional Policy Objectives (RPO) 4.1 and 4.2 of the RSES set out the rationale and basis for preparing these strategies. RPO 4.1 states:

*“In preparing Core Strategies for Development Plans, Local Authorities shall determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements in the RSES, within the population projections set out in the National Planning Framework to ensure that towns grow at a sustainable and appropriate level, by setting out a rationale for land proposed to be zoned for residential, employment and mixed-use development across the Region. Core strategies shall also be developed having regard to the infill/brownfield targets set out in the National Planning Framework, National Policy Objectives 3a-3c.”*

RPO 4.2 states:

*“Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.”*

It is submitted that the proposed development on existing zoned, serviced lands will adhere with the policies and objectives of the Regional Spatial and Economic Strategy for the Eastern & Midland Regional Assembly area and will contribute to providing additional housing units and employment opportunities within the existing envelop of Dublin City and Suburbs.

## 4.0 LOCAL POLICY AND GUIDELINES

### 4.1 DUBLIN CITY DEVELOPMENT PLAN 2022 – 2028

The Dublin City Development Plan 2022-2028 was adopted at a Special Council meeting on the 2nd of November 2022. The Plan came into effect on 14th of December 2022.

#### 4.1.1 Zoning

Under the Dublin City Development Plan 2022 - 2028, the subject site is primarily zoned ‘Objective Z1 – Sustainable Residential Neighbourhoods’ with a small section of the site (southwestern corner) zoned ‘Objective Z2 – Residential Neighbourhoods (Conservation Areas)’.

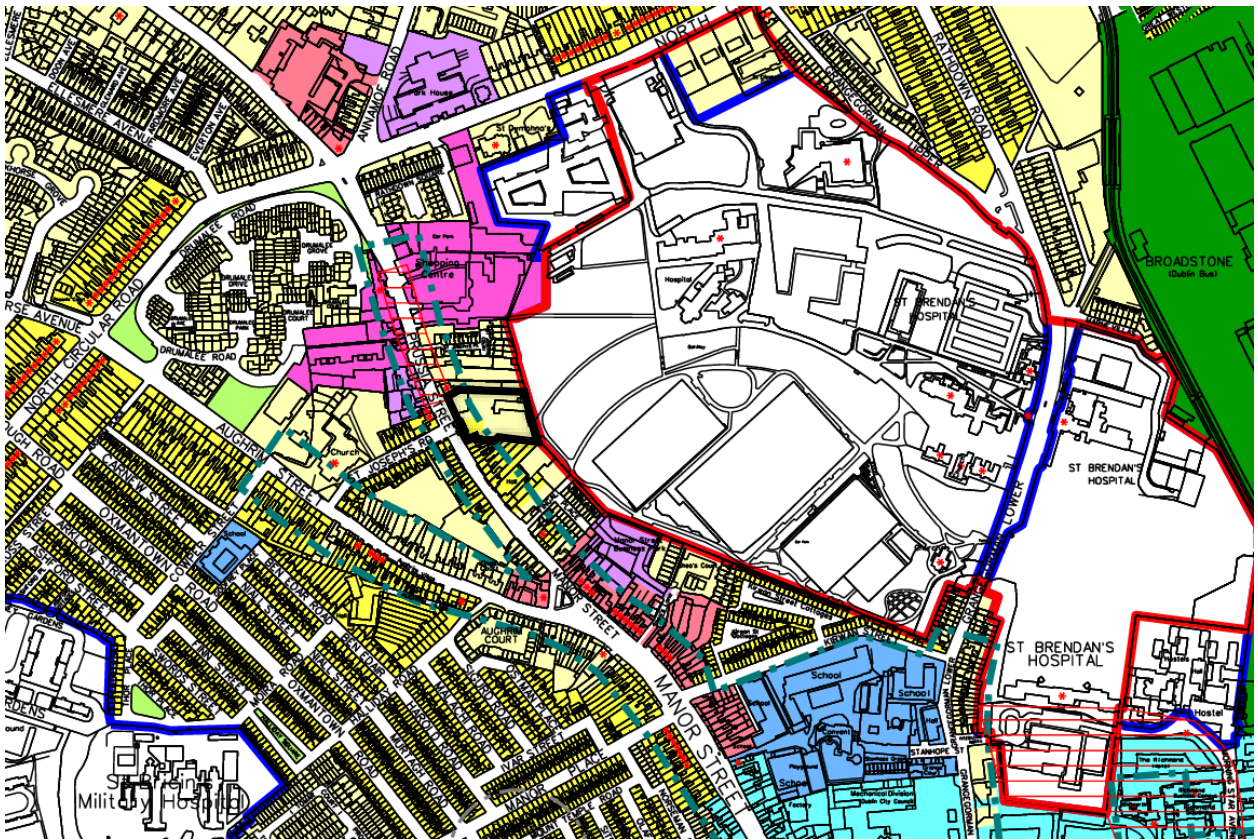


Figure 7: Land Use Zoning Map, site location outlined in black.

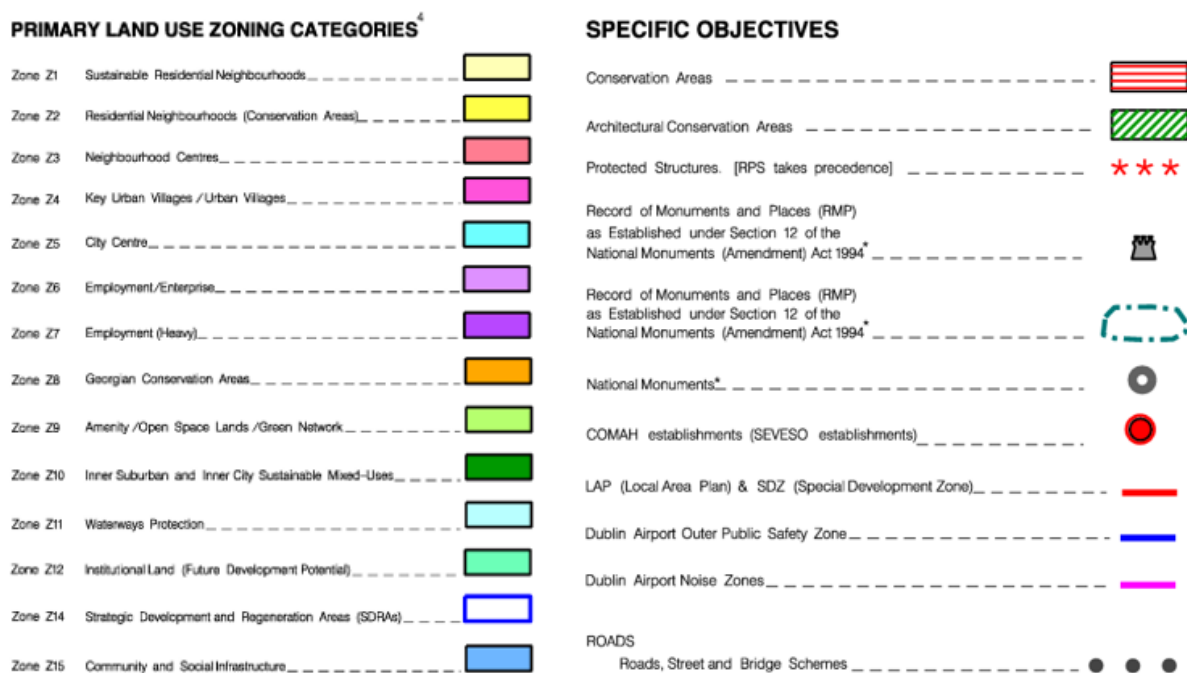


Figure 8: Land-use zoning objective legend key

The ‘Objective Z1’ zoning seeks “to protect, provide and improve residential amenities”, and the ‘Objective Z2’ zoning seeks “to protect and/or improve the amenities of residential conservation areas.”

As stated in the pertaining Development Plan in relation to ‘Zoning Objective Z1’, the uses applicable to the subject lands are as follows:

Permitted in Principle
<p><b><i>Buildings for the health, safety and welfare of the public, childcare facility, community facility, cultural/recreational building and uses, education, embassy residential, enterprise centre, halting site, homebased economic activity, medical and related consultants, open space, park-and-ride facility, place of public worship, public service installation, residential, shop (local), training centre.</i></b></p>
Open for Consideration
<p><b><i>Bed and breakfast, betting office, car park, civic and amenity/recycling centre, garden centre, golf course and clubhouse, hostel, hotel, industry (light), live/work units, media-associated uses, petrol station, pigeon lofts, public house, restaurant, veterinary surgery.</i></b></p>

The uses applicable to the subject site under the ‘Zoning Objective Z2’ are as follows:

**Permitted in Principle**

***Buildings for the health, safety and welfare of the public, childcare facility, embassy residential, home-based economic activity, medical and related consultants, open space, public service installation, residential.***

**Open for Consideration**

***Bed and breakfast, community facility, cultural/ recreational building and uses, education, live-work units, place of public worship, restaurant, veterinary surgery.***

The proposed residential development is permitted in principle under both objectives, with a café/restaurant being open for consideration, and therefore is in accordance with the zoning objectives and the necessary social and physical infrastructure for the area; this remains unchanged from that previously permitted under permission LRD6057/24-S3A.

**4.1.2 Core Strategy**

The purpose of the Core Strategy is to ‘*guide spatial direction of future development and regeneration in the city in line with the principles of compact growth*’ of the area of the Planning Authority and in doing so, to demonstrate that a Development Plan and its policies and objectives are entirely consistent with national and regional policies and strategies.

Regarding the population targets and calculated housing need, it is stated that ‘*the Development Plan must accommodate between 20,120 – 31,520 additional persons up to an overall population target of between 625,750 and 640,000 by 2028.*’ Based on the housing capacity identified by Dublin City Council, there is a sufficient amount of land zoned for residential development to accommodate for the identified growth by 2028.

The Development Plan outlines that there is a total of 5,800ha of land zoned for residential or mixes uses, with ‘*approximately 550 hectares available to develop during this Development Plan cycle, which can provide approximately 49,175 residential units.*’ Significant housing demand exists in the overall Dublin area.

In line with **Policy CSO7**, it is the Policy of Dublin City Council to:

*“To promote the delivery of residential development and compact growth through active land management measures and a co-ordinated approach to developing appropriately zoned lands aligned with key public transport infrastructure, including the SDRAs, vacant sites and underutilised areas.”*

The revised apartment mix proposed will continue to contribute to the provision of housing within Prussia Street, adjacent to the Grangegorman SDRA area, on an underutilised brownfield infill site. It

will contribute to the core strategy of Dublin, in the provision of compact new residential units in the form of 110 apartments being proposed. The proposed development is therefore compliant with the core strategy of the Dublin City Development Plan 2022 – 2028.

#### 4.1.3 Quality Residential Neighbourhoods

In terms of Quality Housing and Sustainable Neighbourhoods in Residential Developments, the Development Plan outlines the following polices:

*“QHSN17: To promote sustainable neighbourhood developments which cater to the needs of persons in all stages of their lifecycle, e.g., children, people of working age, older people, people living with dementia and people with disabilities.”*

*“QHSN36: To promote the provision of high quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood.”*

It is submitted that the revised apartment mix proposed will continue to offer the existing benefits of the previously permitted development under LRD6057/24-S3A. Inclusive of benefits from transportation, wide range of residential and social amenities within Dublin City, that the development will be an example of sustainable development, which continues to promote the 15-minute city concept. For further details on the revised apartment mix please refer to the Architectural Design Statement, prepared by C + W O’Brien Architects, submitted under separate cover of this application. Additionally, for further details on the development scheme in its entirety, we respectfully refer Dublin City Council to planning permission Reg. Ref. LRD6057/24-S3A.

#### 4.1.4 SDRA 8 Grangegorman / Broadstone

Grangegorman is a strategic site that is situated in the city centre. On the 21st December 2010 the Government designated lands at Grangegorman as a strategic development zone (SDZ). It is the vision that this area will be intensified through supporting and meeting the needs of the Health Service Executive (HSE), Dublin Institute of Technology (DIT), the City, and surrounding communities.

The subject area, Prussia Street, falls within the Strategic Development Regeneration Area 8: Grangegorman/Broadstone. The Dublin City Development Plan 2022 - 2028 states the following in regard to their vision for future development of Prussia Street within the SDRA 8 area:

*“Prussia Street is located on the western side of the SDRA linking Stoneybatter Village to North Circular Road. This key thoroughfare provides for significant strategic development opportunities through the regeneration of a number of vacant and underutilised sites for mixed use development. Future development in the area shall provide for a coherent and considered streetscape that respects the existing historic character whilst at the same time ensuring an appropriate scale and density is achieved in line with the 15 minute city objective.”*

DOWNEY submit that the development’s design has not changed significantly and that only the revisions to the apartment mix are to occur, therefore the development in its entirety will continue to have cognisance with the overarching guidance of developments within SDRA 8. For further details

on the development scheme in its entirety with respect to SDRA8, we respectfully refer Dublin City Council to Reg. Ref. LRD6057/24-S3A.

**4.1.5 Compact Growth & Brownfield Development**

Within the Dublin City Development Plan 2022-2028, there is a clear emphasis on compact growth within established urban areas. The following policies and objectives attest to the commitment of Dublin City Council to compact growth on city centre sites, but specifically sites in close proximity to public and active transport infrastructure and within SDRAs. The policies and objectives are as follows:

**SC1 Consolidation of the Inner City:** *"To consolidate and enhance the inner city, promote compact growth and maximise opportunities provided by existing and proposed public transport by linking the critical mass of existing and emerging communities such as Docklands, Heuston Quarter, Grangegorman, Stoneybatter, Smithfield, the Liberties, the North East Inner City and the south and north Georgian cores with each other, and to other regeneration areas."*

**CS07 Promote Delivery of Residential Development and Compact Growth:** *"To promote the delivery of residential development and compact growth through active land management measures and a co-ordinated approach to developing appropriately zoned lands aligned with key public transport infrastructure, including the SDRAs, vacant sites and underutilised areas."*

DOWNEY submit that the revised apartment mix proposed is in accordance with encouraging compact growth and brownfield development within an inner-city location. It will contribute to the regeneration of Prussia Street and contribute to the vision and goals of seeing consolidated brownfield regeneration development occur within the Grangegorman SDRA, including for Prussia Street.

**4.1.6 Development Management**

Chapter 15 of the Dublin City Development Plan sets out development standards and criteria that form the policies and objectives of the City Development Plan to ensure that development occurs in an orderly and efficient manner and that it is in accordance with proper planning and sustainable development. The following section assesses the main set of standards and criteria required for high-quality, sustainable development:

The *Sustainable Urban Housing: Design Standards for New Apartments* under Section 28 of the Planning and Development Act 2000 (as amended) has subsequently been amended which sets out specific planning policy requirements for apartment development. These Section 28 guidelines should be references as part of any planning application for apartment developments. The revised *Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities* were published in 2025.

Criteria	Development Plan Requirement
<b>15.1 Introduction</b>	
<b>15.2 Planning Process and Documentation</b>	
<b>15.2.1</b>	<i>"Applicants are encouraged to consult the Development Plan and other guidelines set out herein to ascertain the requirements for development proposals. Part III of the Planning</i>

<p><b>Legislative Context</b></p>	<p><i>and Development Act 2000, as amended, sets out the legislative context for the control of development and the planning application process with reference to Part 4 of the Planning and Development Regulations 2001, as amended, in respect of the requirements for planning applications.”</i></p> <p>DOWNEY submit that the proposed development has had cognisance with the Development Plan and other relevant guidelines set out herein within the overarching planning policy. We invite the Planning Authority to refer to the <i>Statement of Consistency with Planning Policy</i> section of this report prepared by DOWNEY for further details in how the proposed development has had cognisance with national, regional and local level of policies that are in place to guide requirements for development proposals.</p>
<p><b>15.2.3 Planning Application Documentation - Planning Thresholds</b></p>	<p><i>“Planning applications should be supported by the necessary analysis and documentation to demonstrate the proposed design and rational for a scheme. To assist in the planning application preparation, Table 15-1 sets out the development thresholds for some of the documentation related to specific planning applications.</i></p> <p><i>Please note Table 15.1 for the Thresholds for Planning Applications.”</i></p> <p>The design team has taken cognisance of Table 15.1 for the thresholds for the proposed revisions to the development scheme at Prussia Street and the designated thresholds for reports. Please refer to the <i>Schedule of the List of Documents, Maps, Plans and Drawings</i> submitted under cover of this planning application for proposed alterations to that previously permitted, which has had cognisance with the thresholds as outlined in Table 15.1.</p>
<p><b>15.2.4 Interest in Property</b></p>	<p><i>“With regard to submitting a planning application, under the Planning and Development Regulations, 2001 (as amended), an applicant who is not the legal owner of the land or structure in question must submit a letter of consent from the owner in order to make the planning application.”</i></p> <p>The applicant is the legal owner of 23 – 28 Prussia Street. With appropriate consents also obtained from the GDA regarding the previously permitted southern public plaza gateway route. DOWNEY submit that the planning application is therefore compliant with section 15.2.4 of the Development Plan.</p>
<p><b>15.2.5 Development Contributions</b></p>	<p><i>“Dublin City Council may, when granting planning permission, attach conditions requiring the payment of contribution(s) in respect of public infrastructure and facilities, benefiting development in its area.”</i></p> <p>The applicant is aware that Dublin City Council may grant permission subject to conditions requiring the payment of contributions in respect of public infrastructure and facilities.</p>
<p><b>15.4 Key Design Principles</b></p>	
<p><b>15.4.1 Healthy Placemaking</b></p>	<p><i>“Key principles to consider are:</i></p> <ul style="list-style-type: none"> <li>• <i>The contribution to the public realm for the benefit and / or enjoyment of the locality.</i></li> <li>• <i>The ability to create a sense of place and community using existing site features, tree coverage and landscaping to support green infrastructure and healthy streets.</i></li> </ul>

	<ul style="list-style-type: none"> <li>• <i>The use of high quality materials and finishes including hard and soft landscaping.</i></li> <li>• <i>The orientation of open space and the accessibility to daylight and sunlight.</i></li> <li>• <i>Quality of proposed public, private, and communal open spaces and recreational facilities and the relationship of proposed open spaces with any existing public open space including linkages and permeability to adjacent neighbourhood, facilities and streets.</i></li> <li>• <i>The accessibility of the development and the traffic calming measures in place in accordance with DMURS.</i></li> <li>• <i>The attractiveness of the development for various activities such as walking, cycling, sitting, dining etc.</i></li> <li>• <i>Inter-relationship of buildings / dwellings, roads, pedestrian ways, neighbourhood centre facilities and local parks and green areas – active frontages and passive surveillance will be encouraged.</i></li> </ul> <p><i>All developments will be encouraged to support the creation and nurturing of sustainable neighbourhoods and healthy communities, which are designed to facilitate active travel including walking and cycling, close to public transport insofar as possible, and a range of community infrastructure, in quality, more intensive mixed-use environments in line with the principles of the 15 minute city as set out in Chapters 4 and 5. The provision of active recreation and sports facilities in new neighbourhoods and public spaces will be supported as well as greening measures including the use of nature based water retention infrastructure in the public realm (see policy GI27, objective GIO5)."</i></p> <p>The overarching key principles of healthy placemaking has been taken into account in the formulation of the design process of the proposed development. Please refer to the design statement prepared by C + W O'Brien Architects for a comprehensive response in how the proposal accords with the key principles of healthy placemaking.</p> <p>Dublin City Council are respectfully invited to review planning permission Reg. Ref. LRD6057/24-S3A to assess how the development has evolved over time, particularly through the consultation periods held with Dublin City Council's planning department.</p>
<p><b>15.4.2</b> <b>Architectural</b> <b>Design Quality</b></p>	<p><i>"Key principles to consider are:</i></p> <ul style="list-style-type: none"> <li>• <i>The character of both the immediately adjacent buildings, and the wider scale of development and spaces surrounding the site.</i></li> <li>• <i>The existing context and the relationship to the established pattern, form(s), density and scale of surrounding townscape, taking account of existing rhythms, proportion, symmetries, solid to void relationships, degree of uniformity and the composition of elevations, roofs and building lines. The scale and pattern of existing streets, squares, lanes and spaces should be considered.</i></li> <li>• <i>The existing palette of materials and finishes, architectural detailing and landscaping including walls, gates, street furniture, paving and planting.</i></li> <li>• <i>The suitability of the proposed design to its intended land use and the wider land-use character of the area, along with its relationship with and contribution to the public realm.</i></li> <li>• <i>The design of new development should respect and enhance the Dublin's natural assets such as river and canal frontages, the River Liffey and many quality open spaces that contribute positively to the cityscape and urban realm, the settings of protected structures, areas of special interest and important views and that the design incorporates high quality detail, materials and craftsmanship.</i></li> </ul>

- *The need to protect and enhance natural features of the site, including trees and any landscape setting.*
- *The context and orientation in relation to daylight, sunlight and overshadowing and environmental performance including climate impacts such as downdraft or wind tunnelling.*
- *The main routes which should be distinguished by exploiting vistas, key buildings and landmarks with the activities and functions of the places made visible, thus bringing a sense of liveliness to spaces.*
- *Landmark features which can be used to give treatment to main entrances to a development, complement open spaces and assist in place-making and identity.”*

As permitted under Reg. Ref. LRD6057/24-S3A, the use of high-quality materials and finishes and the appropriate building form, the architectural quality of development will positively contribute to the urban design and streetscape, enhancing the overall quality of the urban environment. In particular, the development responds creatively to and respect and enhance its context.

As permitted under Reg. Ref. LRD6057/24-S3, the architectural package is accommodated by a schedule of materials report that indicate the selected material choices for the proposed development, and those subsequently detailed at planning compliances stage of the process. These are not proposed to be changed under these proposed alterations. We invite the Planning Authority to refer to Reg. Ref. LRD6057/24-S3A for further details into the material choices of the permitted development.

DOWNEY submit that an updated Daylight and Sunlight Assessment has been completed and submitted under separate cover of this report outlining the updated apartment mix ratio is compliant and allows for appropriate levels of daylight/sunlight for each apartment.

**15.5 Site Characteristics and Design Parameters**

**15.5.8 Architectural Design Statements**

*“Applications for 50+ residential units should be accompanied by an Architectural Design Statement or any application below the threshold where the planning authority consider it necessary.*

*Design Statements should include the following information as set out in the table below which build upon the detail of the key design parameters.*

<p><i>Table 15-2: Information Requirements for Design Statements</i></p> <p><b>Residential Developments</b></p> <p><i>Site Location and Description</i></p> <p><i>Context and Setting</i></p> <p><i>Urban Design Rationale</i></p> <p><i>Design Evolution / Alternatives Considered</i></p> <p><i>Block Layout and Design</i></p> <p><i>Site Connectivity and Permeability</i></p> <p><i>Height, Scale and Massing</i></p> <p><i>Materials and Finishes</i></p> <p><i>Open Space (Private, Communal, Public)</i></p> <p><i>Public Realm Contribution</i></p> <p><i>Compliance with Internal Design Standards</i></p>
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	<p><i>Daylight and Sunlight</i>  <i>Overlooking, Overbearing, Overshadowing</i>  <i>Car and Cycle Parking</i>  <i>Management/Lifecycle Report</i>  <i>Compliance with DMURS</i>  <i>Safety and Security</i>  <i>Universal Access</i></p> <p>To comply with the requirements of Section 15.5.8, An Architectural Design Statement has been prepared by C + W O’Brien Architects is submitted under separate cover of this application. This report illustrates the principles that have been outlined within Table 15.2. We invite the Planning Authority to refer to this document for a comprehensive response to the design facets of the proposed development. For further details on the development scheme in its entirety with respect to SDRA8, we respectfully refer Dublin City Council to planning permission Reg. Ref. LRD6057/24-S3A.</p>
<p><b>15.7 Climate Action</b></p>	
<p><b>15.7.2 District Heating</b></p>	<p><i>“District heating is a system for distributing heat generated in a centralised location for residential and commercial heating requirements such as space heating and water heating.</i></p> <p><i>District heating systems will be supported in areas identified in Chapter 3: Climate Action. In these areas, all applications should be designed to cater for district heating systems. The details of the heating system proposed and compatibility with the district heating network should be specified in all planning applications. Applicants are requested to submit a Climate Action and Energy Statement with all planning applications in this zone – see below.</i></p> <p><i>Where district heating systems are not yet in operation, the applicant is required to demonstrate how the proposed heating system of the development can connect and facilitate future use of the district heating system once in place, see policy CA15, CA16, CA17 and CA18 for further information.”</i></p> <p>Please refer to the previously permitted Climate Action Energy Statement prepared by DKP<sub>en</sub> submitted under planning permission Reg. Ref. LRD6057/24-S3A for further details on how the proposed development has considered the inclusion of low carbon energy and heating solutions as part of the overall design and planning of the proposed development.</p>
<p><b>15.9 Apartment Standards</b></p>	
<p><b>15.9.1 Unit Mix</b></p>	<p><b><i>* These have now been updated by the Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025). The below unit mix reflects the most recent guidelines.</i></b></p> <p><i>“Specific Planning Policy Requirement 1 states that housing developments may include up to 50% one bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms unless specified as a result of a Housing Need</i></p>

*and Demand Assessment (HNDA) carried out by the Planning Authority as part of the Development Plan process.”*

The proposed development will consist of 8 additional units to now provide a total of 110 units, comprising of 68 no. 1 beds, 39 no. 2 beds, 2 no. 3 beds, and 1 no. 4 bed in 3 no. blocks. DOWNEY submit that this is acceptable in principle given that the proposed development has been designed to the requirements of an AHB. This is in accordance with Section 15.9.1 of the Dublin City Development Plan, which states the following regarding unit mix and exceptions:

*“Standards may be relaxed for other social housing needs and/or where there is a verified need for a particular form of housing, for example for older people, subject to the adjudication of the Housing & Community Services Department.”*

Co-Operative Housing Ireland (CHI) are an Approved Housing Body recognised by Dublin City Council. A need for primarily 1- & 2-bedroom units have been identified. Please refer to the previous letter of support from CHI in regard to the planning permission on site.

**15.9.2 Unit Size / Layout**

**\* These have now been updated by the Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025). The unit size and layout reflect the most recent guidelines.**

*“Specific Planning Policy Requirement 3 sets out the minimum floor areas for apartments. The minimum standards for apartments, as set out in the guidelines are as follows:*

Unit Type	Bedspace	Floor Area Requirements
Studio	1 bedspace	37 sq. m.
1 bed	2 bedspaces	45 sq. m.
2 bed	4 bedspaces	73 sq. m.
3 bed	5 bedspaces	90 sq. m.

*These units will be restricted to a maximum of 10% of the overall unit mix. The 2 bedroom, 3 person unit will only be considered as part of specialist housing provision as specified above and will not be considered as standard residential accommodation. The majority of all apartments in any proposed scheme of 10 or more apartments (excluding Build to Rent accommodation) shall exceed the minimum floor area standard for any combination of the relevant 1-, 2- or 3-bedroom unit types, by a minimum of 10% (any studio apartments must be included in the total, but are not included as units that exceed the minimum by at least 10%). In accordance with the Housing Options for an Ageing Population Policy Statement 2019, 50% of the apartments that are in excess of the minimum sizes should be designed in accordance with the guidance set out in Universal Design Guidelines for Homes in Ireland 2015 to ensure that they are suitable for older people, mobility impaired people, people living with dementia and people with disabilities. Flexibility and adaptability are key considerations in the design of residential units. The concept of habitable rooms as distinct from bedrooms is important as it allows a residential unit to adapt to the needs of its residents over time (with the exception of the studio unit). A habitable room of suitable size and design can change from a dining room to a bedroom, to a study as needs change. In particular, the second/ third bedroom should be flexible and the residential unit made attractive to households at different*

	<p><i>lifecycle stages. Furthermore, layouts and dimensions should allow for the delivery of furniture and facilitate home working where feasible. For larger dwellings, the provision of one main living room separate from a combined kitchen/dining area should be considered. The needs of children must be considered in the design of the unit and this includes play areas, storage for play equipment, bathrooms big enough to bath a child, study areas, etc.”</i></p> <p>The proposed unit typologies as submitted under cover of the planning drawings to the floor plans and within the Schedule of Accommodation (HQA), have had cognisance of the minimum standards as set out within the ‘Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025)’, and as such accords with the proper planning and sustainable development of the area. Please refer to the enclosed floor plans and HQA prepared by C + W O’Brien Architects for further information in this regard.</p>
<p><b>15.9.3 Dual Aspect</b></p>	<p><b>* These have now been updated by the Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025). The unit size and layout reflect the most recent guidelines.</b></p> <p><b>SPPR3 now requires a minimum of 25% dual aspect.</b></p> <p><i>“Specific Planning Policy Requirement 4 requires a minimum of 33% dual aspect units in central and / or accessible urban locations and 50% of units in suburban and / or intermediate locations.</i></p> <p><i>Dublin City Council will encourage all developments to meet or exceed 50% dual aspect within the development unless specific site characteristics dictate that a lower percentage may be appropriate.”</i></p> <p>The proposed development comprises of 48% dual aspect apartments in a central urban location, which exceeds the minimum requirement of 25% of the apartments to be dual aspect as outlined.</p> <p>We invite the Planning Authority to refer to the Housing Quality Assessment prepared by C + W O’Brien Architects for further information which depicts which apartments are single aspect and dual aspect.</p>
<p><b>15.9.4 Floor to Ceiling Height</b></p>	<p><i>“SPPR 5 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) set out the requirements for minimum floor to ceiling heights. A minimum floor to ceiling height of 2.7m for ground floor residential units and a minimum of 2.4m in upper floor shall be provided. Where commercial units are proposed or where flexibility for adaptation to alternative uses is required at ground floor level, a floor to ceiling height of 3.5m to 4m shall be applied. This will be assessed on a case by case basis.”</i></p> <p>A minimum floor to ceiling height surpassing 2.7 metres has been incorporated into the proposed design, with the ground floor levels comprising of 3.1 metres from floor-to-floor height at ground level.</p> <p>Please refer to the Site Sections prepared by C + W O’Brien Architects for further information in this regard. There are no changes proposed from that previously permitted under Reg. Ref. LRD6057/24-S3A.</p>

<p><b>15.9.5 Lift, Stair Cores and Entrance Lobbies</b></p>	<p><i>“Specific Planning Policy Requirement 6 as set out in the Sustainable Urban Housing: Design Standards for New Apartments (2020) specifies that a maximum of 12 apartment per core may be provided. The maximum provision may be relaxed for refurbishment or infill sites of 0.25ha on a case by case basis.</i></p> <p><i>See Section 3.26 to 3.34 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.”</i></p> <p>We invite the Planning Authority to refer to the Floor Plans prepared by C + W O’Brien Architects for further information which depicts that the proposed cores of the apartments are compliant with Section 15.9.5.</p>
<p><b>15.9.6 Internal Storage</b></p>	<p><i>“Internal storage within an apartment unit shall be provided in accordance with the Sustainable Urban Development: Design Standards for New Apartments as set out in Appendix 1 and Section 3.30 to 3.34 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details. Flexibility shall be provided in certain circumstances on a case by case basis.”</i></p> <p>We invite the Planning Authority to refer to the Housing Quality Assessment prepared by C + W O’Brien Architects for further information which depicts the dedicated storage space allocated per apartment unit.</p>
<p><b>15.9.7 Private Amenity Space</b></p>	<p><i>“Private amenity space shall be provided in the form of terrace, balcony or private garden and should be located off the main living area in the apartment. The minimum areas for private amenity are set out in Appendix 1 and Section 3.35 to 3.39 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.</i></p> <p><i>At ground floor level, private amenity space should be sufficiently screened to provide for privacy. Where ground floor apartments are to be located adjoining the back of a public footpath or other public area, consideration may be given to the provision of a ‘privacy strip’ of approximately 1.5 m in depth, subject to appropriate landscape design and boundary treatment.”</i></p> <p>It is submitted that the proposed development is in keeping with the requirements and standards of the ‘Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025)’. For full details in this regard, please refer to the Architectural Drawings and HQA prepared by C + W O’Brien Architects submitted under separate cover of this application.</p>
<p><b>15.9.8 Communal Amenity Space</b></p>	<p><i>“All new apartment developments are required to provide for communal amenity space externally within a scheme for the use by residents only. Communal open space provision is in addition to any private or public open space requirements. Communal amenity spaces may comprise of courtyard spaces and linear open spaces adjacent to the development.</i></p> <p><i>The minimum areas for private amenity are set out in Appendix 1 and Section 4.10 to 4.12 of the Sustainable Urban Housing: Design Standards for New Apartments (2020) for details.”</i></p> <p>It is submitted that communal amenity space meets the requirements of the ‘Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025)’. We</p>

	respectfully invite Dublin City Council to refer to the drawings, HQA and SOA prepared by C + W O’Brien Architects submitted under separate cover of this application.
<b>15.9.12 Access and Services</b>	<p><i>“Pedestrian and vehicular access points should be clearly identified and located in areas that are physically overlooked. Pedestrian access should cater for all users including disabled persons and the elderly. Internally within a scheme, access to each individual unit should be clearly identified and well-lit through natural light where feasible.”</i></p> <p>It is submitted that the design has maintained appropriate access and services, consistent with that previously permitted under LRD6057/24-S3A and accepted by Dublin City Council. For further details on the development scheme in its entirety with respect to access and services, we respectfully refer Dublin City Council to planning permission Reg. Ref. LRD6057/24-S3A and the drawings submitted under separate cover of this application prepared by C + W O’Brien Architects.</p>
<b>15.9.16.1 Daylight and Sunlight</b>	<p><i>“A daylight and sunlight assessment should be provided to assess the impact of the proposed development on the surrounding properties and amenity areas outside the site boundary and assess the daylight and sunlight received within each individual unit and communal areas of a proposed scheme.”</i></p> <p>An updated Daylight and Sunlight analysis was conducted by Digital Dimensions for the proposed revisions to the apartment mix submitted under separate cover of the proposed alterations to that previously permitted. The proposed development has taken into account the optimal layout that would ensure that each unit receives a sufficient level of daylight and sunlight. The proposal is therefore in accordance with the requirements as set out within Daylight and Sunlight. We respectfully invite the Planning Authority to refer to the report for further details.</p>

## 5.0 CONCLUSION

This Planning Report has been prepared by DOWNEY to accompany a planning application for proposed modifications to a previously permitted Large-scale Residential Development (LRD) under planning permission Reg. Ref. LRD6057/24-S3A on lands at 23 - 28 Prussia Street, Dublin 7.

This Statement of Consistency provides clear detailed on how the revised apartment numbers and unit mix demonstrates that the proposed complies with the relevant national, regional, and local planning policy relevant to the subject site. DOWNEY submit that the proposed development will provide an appropriate apartment mix at the subject lands that are zoned for residential development as previously approved under Reg. Ref. LRD6057/24-S3A. For further details on the development scheme in its entirety, we respectfully refer Dublin City Council to planning permission Reg. Ref. LRD6057/24-S3A.

It is submitted that the proposed development is in accordance with the proper planning and sustainable development of the area in which it is located as expressed in national, regional and local planning policy and Guidelines issued under Section 28 of the Planning and Development, 2000 (as amended).