

LRD PLANNING REPORT

PROPOSED LARGE SCALE RESIDENTIAL DEVELOPMENT (LRD) COMPRISING AMENDMENTS TO A PERMITTED LRD (DLRCC REG REF. LRD/24A/0882/WEB) AT KNOCKRABO, MOUNT ANVILLE ROAD, GOATSTOWN, DUBLIN 14.



PREPARED FOR:

KNOCKRABO INVESTMENTS DAC,
32 Molesworth Street,
Dublin 2.

PREPARED BY:

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28th October 2025

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Principal Planning Officer
Planning Department
Dún Laoghaire-Rathdown County Council
Marine Road
Dún Laoghaire
Co. Dublin
A96 K6C9

28th October 2025
[Online Submission]

Dear Sir/Madam,

RE: PROPOSED LARGE SCALE RESIDENTIAL DEVELOPMENT (LRD) COMPRISING AMENDMENTS TO A PERMITTED LRD (DLRCC REG REF. LRD/24A/0882/WEB) AT KNOCKRABO, MOUNT ANVILLE ROAD, GOATSTOWN, DUBLIN 14.

1.0 INTRODUCTION

1.1 Outline of Proposal

Knockrabo Investments DAC¹ ("the Applicant") has retained Tom Phillips + Associates² ("TPA") in association with O'Mahony Pike Architects ("OMP") and a multidisciplinary team to submit an application to Dun Laoghaire Rathdown County Council (DLRCC) in relation to a proposed residential development at the above referenced site, which comprises amendments to a permitted Large Scale Residential Development (LRD) under DLRCC Reg Ref. LRD/24A/0882/WEB.

The proposed amendments relate solely to the provision of a new block at previously proposed Block E. We note that Condition 4 of the *Notification of Decision to Grant Permission* (DLRCC Reg Ref. LRD/24A/0882/WEB) required the following;

"Prior to the commencement of development, the Applicant shall submit for written approval of the Planning Authority revised drawings which show 'Block E' (8 no. units) omitted..."

As such, whilst the previous LRD application (DLRCC Reg Ref. LRD/24A/0882/WEB) at Knockrabo was permitted, Condition 4 required the omission of Block E, resulting in the loss of 8 No. units. The stated reason for the omission of Block E related to protecting the setting and amenity of the Protected Structures on site, and protecting and preserving existing trees on site.

In this regard, the proposed amendments seek the construction of a new duplex block which is reduced in height and scale, is set back further from the Protected Structures and results in the retention of 1 of the 2 No. category A trees at this location.

¹ 32 Molesworth Street, Dublin 2 Dublin D02 Y512

² 80 Harcourt Street, Dublin 2, D02 F449.

In summary, the proposed development will consist of a new block in the vicinity of the previously proposed Block E, comprising;

- the construction of 1 No. new 3 storey duplex block, comprising 6 No. duplex apartments (4 No. 2 bed units, and 2 No. 3 bed units);
- the provision of 8 No. car parking spaces at grade level (including 1 No. accessible parking space), 22 No. bicycle parking spaces (10 No. visitor spaces and 12 No. long stay spaces), and 1 No. motorcycle parking space;

We note that the proposed duplex scheme, when compared to Block E as previously proposed under LRD/24A/0882/WEB, provides the following;

- The relocation of Block E further north away from the Gate Lodge;
- A reduction in height of 2 No. Storeys over the previously proposed Block E;
- The provision of 6 No. duplex units;
- The reconfiguration also provides for the relocation of the 8 No. car parking spaces at semi basement level to grade level, to the north of duplex scheme.

The current proposal seeks to provide a relocated and reconfigured duplex scheme to provide 6 No. duplex units, thus providing an overall total of 156 No. units across the Knockrabo Phase 2 development lands.



Figure 1.1: Site Location - Subject site with LRD Parent Planning Application (DLRCC Reg. Ref. LRD241/0882/WEB) site boundary outlined in red, and focussed site area which is the subject of the current planning application outlined in green (Source: Urban Street Maps, annotated by TPA, 2024)



Figure 1.2: Aerial view of subject site with LRD Parent Planning Application (DLRCC Reg. Ref. LRD241/0882/WEB) site boundary outlined in red, and focussed site area which is the subject of the current planning application outlined in green (Source: Google Maps, annotated by TPA, 2025)

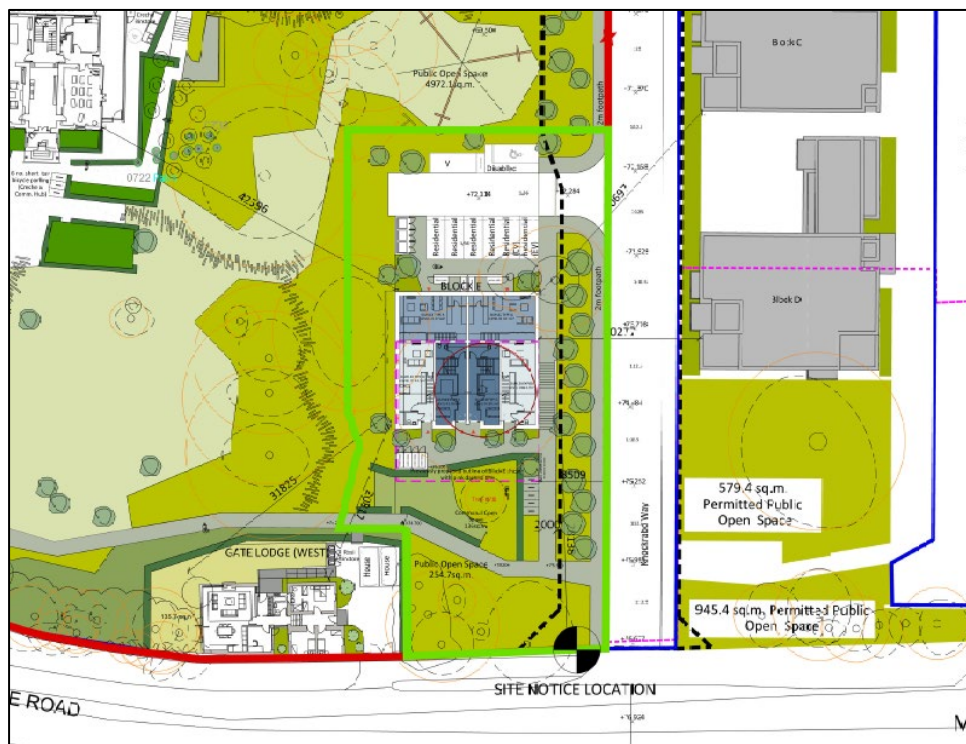


Figure 1.3: Extract of Proposed Site Layout Plan. (Source: OMP Architects, Dwg. No. 1307H-OMP-00-SP-DR-A-1000, Cropped by TPA, 2025).

1.2 Proposed Development Description [as per Statutory Notices]

The proposed description of development, as per Statutory Notices, is as follows;

“Knockrabo Investments DAC intend to apply for permission for a Large-scale Residential Development (LRD) application comprising amendments to a previously permitted LRD application (Dun Laoghaire Rathdown County Council (DLRCC) Reg. Ref. LRD24A/0882/WEB) on lands at Knockrabo, Mount Anville Road, Goatstown, Dublin 14.

The proposed amendments will consist of:

- the construction of 1 No. new part 2 storey part 3 storey (including semi-podium level) duplex block, comprising 6 No. duplex apartments (4 No. 2 bed units, and 2 No. 3 bed units) resulting in the total provision of 156 no. units (comprising 12 no. houses and 144 no. duplex/apartment units);*
- the provision of 8 No. car parking spaces at grade level (including 1 No. accessible parking space), 22 No. bicycle parking spaces, and 1 No. motorcycle parking space; and*
- All other ancillary site development works to facilitate construction, site services, piped infrastructure, plant, public lighting, bin stores, provision of public, communal and private open space areas comprising hard and soft landscaping, PV panels at roof level, site services all other associated site excavation, infrastructural and site development works above and below ground.*

The development will be served by an internal circulation road connected to the permitted access road ‘Knockrabo Way’ (DLRCC Reg. Ref. D13A/0689; ABP Ref. PL.06D.243799, DLRCC Reg. Ref. D16A/0821 and DLRCC Reg. Ref. D16A/0960). The application does not impact on the future access to the Reservation for the Dublin Eastern Bypass.”

1.3 Part V

In order to comply with Part V of the Acts, Knockrabo Investments DAC (the prospective Applicant) proposed to provide 10% of the proposed units on site as part of the permitted scheme (DLRCC Reg. Ref. LRD241/0882/WEB), pursuant to section 96(3)(i) of the Acts. This equated to 15 No. units (3 No. 1 bed units and 9 No. 2 bed units and 3 No. 3 bed units) located within Block G of the permitted scheme.

Whilst Condition 4 of the grant of planning permission required the omission of the previously proposed Block E (consisting of 8 No. units) the proposed Part V provision remained the same as what was initially proposed under the 158 No. unit proposal. The proposed development results in the total provision of 156 No. units across Knockrabo Phase 2 lands – therefore the agreed provision of 15 No. units therefore satisfies the Part V requirements.

Notwithstanding this, a revised *Validation Letter – Part V*, dated 25th September 2025 has been issued by DLRCC to the Applicant in respect of the proposed development, which is submitted with this application.

1.4 Pre-Application Consultation Meeting (DLRCC Ref.: PAC/LRD1/008/25)

A Section 247 Meeting was held on the 24th July 2025 between the Applicant's Design Team, including the following personnel from Dún-Laoghaire County Council:

- Ciaran Power, Senior Executive Planner
- Sam McDaid, Executive Planner
- Lisa Cairns, Executive Planner
- Sinead O Hara, Conservation Officer
- Dermot Fennell, Transport Engineer
- Laura Hedderman, Parks Department
- Conor Higin, Parks Department

1.5 Section 32B Stage 2 LRD Meeting (DLRCC Ref.: PAC/LRD2/009/25)

An LRD meeting was subsequently held on the 2nd October 2025, with Dun Laoghaire Rathdown County Council (DLRCC) and was attended by Stephen Barrett (Tom Phillips + Associates) from the Applicant side, and Ciarán Power (Senior Executive Planner) and Neil Molloy (Parks & Landscape Dept) from DLRCC.

The LRD Meeting was informed by the LRD Meeting Request, submitted to the Planning Authority on 29th September 2025.

1.6 Multi-disciplinary Team

The Design/Planning Team comprises:

- David Slattery Conservation Architects, Historic Building Consultants;
- Dermot Foley Landscape Architects (DFLA);
- Model Works (MW);
- O'Mahony Pike (OMP) Architects;
- Waterman Moylan (WM), Consulting Engineers;
- IES Environmental Solutions;
- Tom Phillips + Associates, Town Planning Consultants.

1.7 Statutory Fee

The statutory Fee of **€6,776.40** was paid by EFT on the 21st October 2025 under reference '120000076094'.

1.8 Schedule of Documents

A full schedule of all contents of this Application is outlined under Section 6 of this report.

1.8 Format of the Planning Report

This *Planning Report* is laid out in four sections, as follows:

- **Introduction to Proposal.** Section 1 provides an introduction to the Application.
- **Site Context.** Section 2 outlines the physical and planning context of the site.
- **Planning History.** Section 3 provides a summary of the site's planning history and that of relevant surrounding sites.
- **Key Planning Policies.** Section 4 provides an overview of the proposed scheme in the context of key planning policies.
- Section 5 provides the **Conclusion.**
- Section 6 outlines the **Documents Submitted with the Application.**

2.0 SITE LOCATION AND URBAN CONTEXT

2.1 Subject Site and Context

The subject site comprises a parcel of lands at Knockrabo, Mount Anville Road, Dublin 14, as illustrated in Figure 2.1.

The site is bounded as follows:

- to the south by Mount Anville Road;
- to the north and west by Knockrabo Phase 2 lands on which DLRCC Reg. Ref. LRD24A/0882/WEB)the 'Parent Application' is permitted;
- to the east by Phase 1 of the Knockrabo development (permitted under DLRCC Reg. Ref.: D13A/0689; ABP Ref. PL.06D.243799, DLRCC Reg. Ref. D16A/082; and DLRCC Reg. Ref. D16A/0960 (Phase 1A)).

The site comprises an area of c.2.54 hectares (with a focussed/green line site area of 0.2 hectares) and is predominantly greenfield, and consists of grounds sloping northwards away from Mount Anville Road.

It is proposed that access to the site will be from Knockrabo Way, the established access route from Mount Anville Road to the reservation corridor of the Dublin Eastern By Pass to the north of the overall Knockrabo lands. A local access road will provide access to proposed duplex block.

The site is located in the suburban area of Goatstown, Dublin 14 and as noted above, to the northern side of Mount Anville Road. The junction with Goatstown crossroads is located within 400m to the west of the site and the junction with Roebuck is within c.700 metres to the northeast.

The site is located within 1.4km of the N11 Strategic Road Corridor, located to the northeast of the site. The site is also within 2.8km of the M50, providing convenient access to the national road motorway network.

With respect to public transport the site is within 1.5km of Luas green line stops at Dundrum. A number of bus stops and services are proximate to the subject site, as follows:

Mount Anville Road

Route S6 is an orbital route operating at a frequency of 15 minutes in both directions between Old Bawn Centre in Tallaght and Blackrock DART Station via Nutgrove Retail Park and the UCD Campus at Belfield. Route S6 operates along Mount Anville Road, to the front entrance of the subject site, with both directions located within 2 -3-minute walk from the subject site.

Goatstown Road

Route 11 is City Bound route serving The Goat public house and surrounding area and operating at a frequency of 15 - 20 minutes in both directions between Sandyford Business Park and Wadelai Park via Ranelagh and O'Connell Street. Stops for both directions are located within an 7-minute walk from the subject site.

Eden Park Road

Route L25 is a local route operating along Eden Park Road to the south of the subject site at a frequency of 20 minutes in both directions between Dundrum Luas and Dun Laoghaire DART Park via Stillorgan Village. Stops for Route L25 in both directions are located within a 17 - 18-minute walk from the subject site.

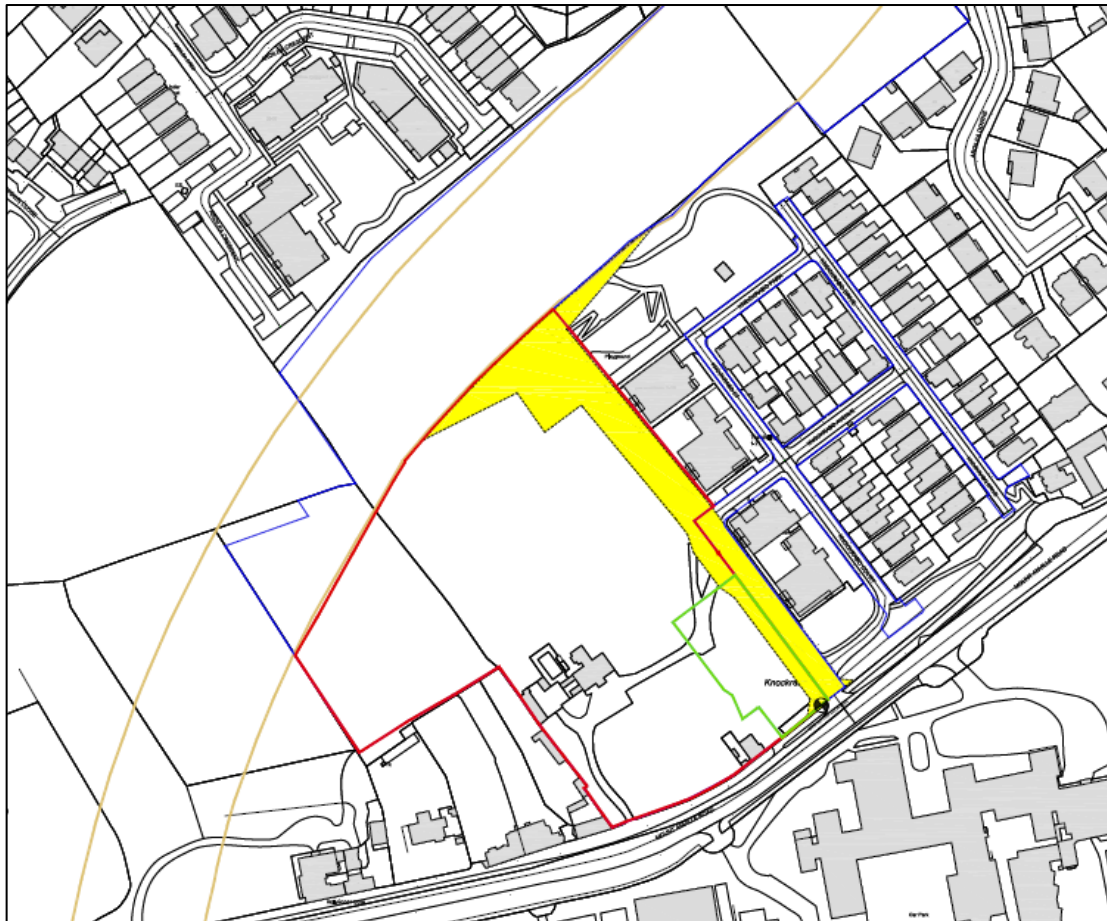


Figure 2.1: Excerpt from Site Location Map, with subject site outlined in red. Source: OMP Architects Drawing No. 1307H-OMP-00-00-DR-A-1011

2.2 Conveniently Accessible Inner Suburban Site: High Quality Existing Public Transport Services

The site is located c. 6.5km from Dublin city centre, an inner suburban location. The site is also within 1.8 km of UCD; 2.5km of Sandyford Business Park, significant employment hubs in immediate proximity to the Application Site.

The site is conveniently accessible, located within 1.5km of Luas green line stops at both Kilmacud and Dundrum. The closest bus stops are on Mount Anville Road (Dublin Bus Route S6 Orbital Route, located within c.100 metres of the site) and on Goatstown Road (Dublin Bus Route No.11, located within c. 480m from the site).

The site therefore considered to be appropriately located to provide medium density residential development.

2.3 Zoning Context – Compliant

The subject site is zoned Objective A (Residential), the objective of which is *“to provide residential development and improve residential amenity while protecting the existing residential amenities”*.

‘Residential’ uses are permitted under the Land Use Matrix under the Objective A Zoning.

Refer to Section 4.2 for further information.

3.0 PLANNING HISTORY

Planning Application DLRCC Reg. Ref D13A/0689; ABP Ref. PL06D.243799 (Phase 1)

On 23rd January 2015, An Bord Pleanála granted permission for a residential development comprising 88 No. dwellings (47 No. houses, including Knockrabo existing Gate Lodge (East) and 41 No. apartments), on a site of 2.54 hectares at Knockrabo, Mount Anville Road, Goatstown, Dublin 14. This followed an earlier *Notification of Decision to Grant Permission* issued by DLRCC on 12th August 2014.

Planning Application DLRCC Reg. Ref D16A/0821 – Amendments to Permitted Blocks A, B, C (Phase 1)

A planning application was lodged on 9th November 2016 for permission to amend the above noted parent planning permission. The planning application related to the reconfiguration of permitted Apartment Blocks A, B and C, on a site of 0.34 hectares.

A *Decision to Grant Permission* was issued by DLRCC on 16th February 2016. The application resulted in a total of an additional 10 No. units within these blocks, with associated revisions to the basements and car parking facilities.

Planning Application DLRCC Reg. Ref D16A/0960 – Block D + 3 Houses – (Knockrabo Phase 1A)

A Planning Application was lodged on 20th December 2017 for Phase 1A, which included amendments to the above permitted development. The application as lodged included:

- 1 No. 5 storey apartment Block (Block D) to the south-east of permitted Block C;
- amendments to parent permission to integrate the basement car parking level of Block D with the permitted basement level car park under Block C;
- the provision of an additional 3 No. Houses at the southern end of Knockrabo Court as permitted; and
- landscape and boundary treatment works to Mount Anville Road.

A *Decision to Grant Permission* was issued by DLRCC in 10th August 2017.

Condition 5 of this Permission required that the applicant submit and agree a wayleave agreement for the Dublin Eastern Bypass access route area (footpath, carriageway, construction access reservation, passing lay-by, footpath) for future construction (DEBP) vehicles at Mount Anville Road junction. This agreement is now in place, the lands will not form a wayleave, but will be subject to a Licence Agreement with DLRCC, the provisions of Article 22 (2) (b) (iii) of the Planning and Development Regulations 2001-2021 do not apply in this instance (figure 3.1 refers).

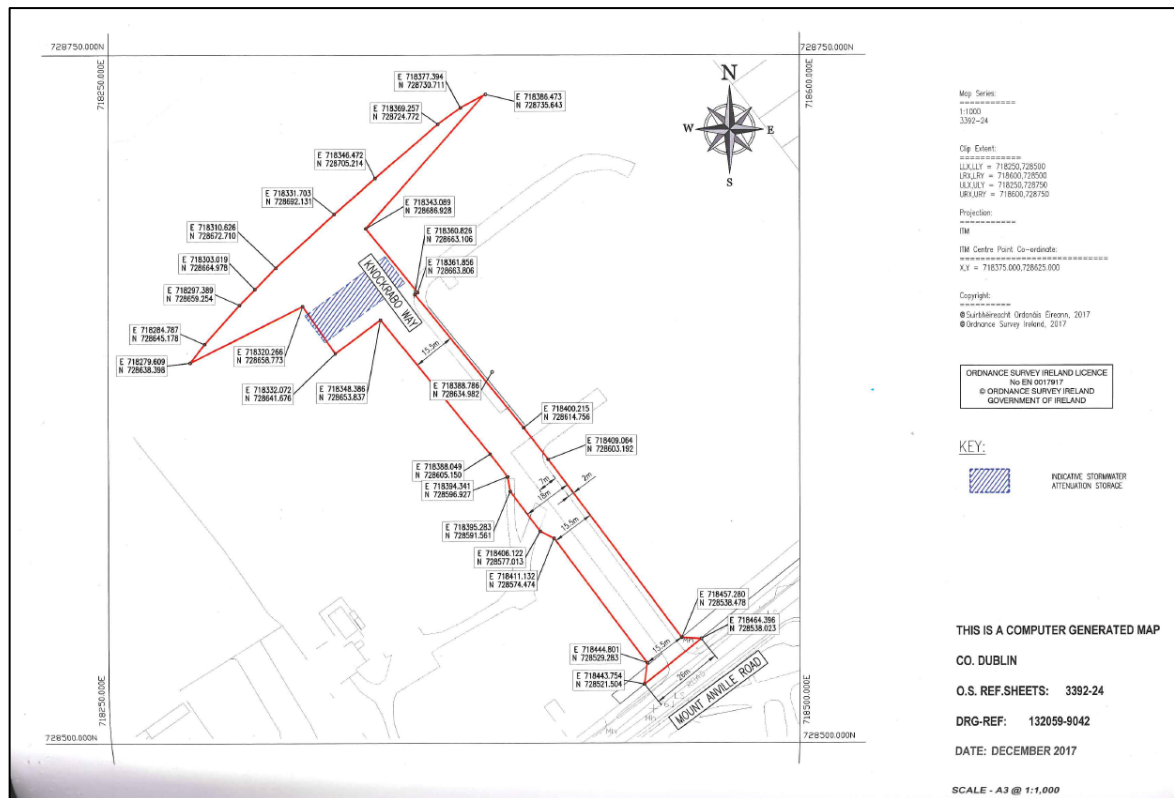


Figure 3.1: Executed Wayleave as agreed with DLRCC. (Source: Knockrabo Investments DAC, Cropped by TPA, 2024).

Planning Application DLRCC Reg. Ref.: D17A/1124 – Phase 2 – (93 units)

A planning application was lodged in December 2017 for the Phase 2 residential development. The application as lodged generally provided for the following:

Some 4 No. blocks of apartments (Blocks E, F, G and H) ranging in height from 3 / 4 storey to 6 storey over basement comprising 69 No. units;

- the provision of 20 No. house units;
- the refurbishment of Knockrabo Gate Lodge (West) and existing Coach House building as residential units;
- the refurbishment of Cedar Mount to provide a mix of community / leisure uses, a Childcare Facility and 2 No. apartments.

A Further Information Request was issued by DLRCC on which included the following Item:

“The Applicant is advised that there are concerns in relation to the negative impact Block E will have, particularly given its proximity to the Gate Lodge and the impact on the setting of Cedar Mount House, in addition to the removal of a number of Category A trees. The applicant is requested to explore alternatives for the treatment of this area of the site and to submit revised proposals. In this regard revised visualisations taken from the Gate Lodge and from Cedar Mount House will be required.”

Notwithstanding the consideration of the Design Team that Block E as originally submitted represented an appropriate scale and form of development, an alternative design proposal

for the Block was submitted as part of the Response to Further Information. The revised design comprised a 3 storey block with the upper floor set back on eastern and western sides providing 6 no. duplex apartments with 8 no. car parking spaces at surface level.

A number of illustrative perspective views of the block in the context of the permitted development within Phase 1 + 1A, and within the rest of this development proposal were provided with the Further Information Response which demonstrated that the block would be fully screened on the western and southern sides. The revised design also allowed for the retention of a further tree (Tree 0711) on the southeastern side of the block.

In assessing the Applicant's Further Information Response, DLRCC continued to have concerns with regard to the impact of the scale, massing and height of Block E on the setting and amenity of the Protected Structures. Whilst it was acknowledged that the block had been revised and reduced in scale, it was considered that the block should be omitted in order to protect the integrity of the protected structure. Following a Request for Clarification of Further Information (unrelated to the proposed Block E), permission was granted for the Phase 2 scheme on 6th September 2018. The decision included the following Condition with regard to Block E:

2. Prior to commencement of development, the applicant shall submit revised drawings which show Block E omitted. This area of the site shall be incorporated into the area of open space and the existing trees on site protected and retained.

Reason: To protect the setting and amenity of the Protected Structures on site.

The decision was not subject to any third party appeal. The Phase 2 development as granted comprises 20 No. dwelling houses, the refurbished Coach House and Gate Lodge (west), 2 no. apartments and a creche and community / leisure uses located within Cedar Mount, and some 57 no. apartments located within 3 no. blocks.

Strategic Housing Development (SHD) Planning Application ABP Ref.: 311826-21 – Phase 2 – (227 units)

An application was made to An Bord Pleanála under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016, on the 29th day of October 2021 for an SHD comprising 227 No. apartment units.

The application, comprising an area of c.1.78 hectares was made on lands which form part of the subject LRD application.

The SHD application related to Phase 2 of development on the Knockrabo lands (Phase 1 of 'Knockrabo' was granted under DLRCC Reg. Ref. D13A/0689/ ABP Ref. PL06D.243799 and DLRCC Reg. Ref. D16A/0821 (Phase 1) and DLRCC Reg. Ref. D16A/0960 (Phase 1A) and comprises a total of 125 no. units.

The proposed development also included amendments to the permitted 'Phase 2' residential development of 93 No. units, childcare facility and community/leisure uses (DLRCC Reg. Ref. D17A/1124). This component related to the reconfiguration and redesign of the approved residential development.

The development included the provision of 4 separate apartment blocks ranging in height from part two to part 8 storeys including podium level.

This application was granted by ABP, however the decision was subjected to Judicial Review proceedings, pursuant to section 50, 50A and 50B of the Planning and Development Acts 2000 (as amended), (2024 IEHC 86 refers). In this instance, a Third Party sought to quash the decision of An Bord Pleanála, dated 22nd March 2022.

In this context, we note the decision of Judge Holland, 12th March 2024) to Quash the challenge, to matters relating to “public transport only”. Justice Holland further considered,

“that the matter should be remitted to the Board for its reconsideration” (Para.245).

This Decision has now been remitted to An Bord Pleanála for final consideration (ABP Ref. 320812-24 (reactivated case reference) refers).

Notwithstanding, the Design Team has carefully reviewed the judgement of Justice Holland in preparing the subject application. Moreover, the subject application follows principles established in previous permissions at the subject site, including concerns raised by DLR during the SHD process.

Large-scale Residential Development (LRD) DLRCC Reg. Ref. LRD24A/0882/WEB – Phase 2 (150 units)

An application was made to Dun Laoghaire Rathdown County Council (DLRCC) on the 4th day of November 2024 for an LRD comprising 158 No. units (comprising 12 No. houses and 146 No. duplex and apartment units)

The application, comprising an area of c.2.54 hectares was made on lands which form part of the subject LRD amendment application.

The LRD application related to Phase 2 of development on the Knockrabo lands (Phase 1 of ‘Knockrabo’ was granted under DLRCC Reg. Ref. D13A/0689/ ABP Ref. PL06D.243799 and DLRCC Reg. Ref. D16A/0821 (Phase 1) and DLRCC Reg. Ref. D16A/0960 (Phase 1A) and comprises a total of 125 no. units.

The development included the provision of 4 separate apartment blocks ranging in height from part two to part 8 storeys including podium level.

The planning application was granted by DLRCC on 28th March 2025 (final grant date). We note that Condition 4 of the *Notification of Decision to Grant Permission* (DLRCC Reg Ref. LRD/24A/0882/WEB) required the following;

“Prior to the commencement of development, the Applicant shall submit for written approval of the Planning Authority revised drawings which show 'Block E' (8 no. units) omitted...”

As such, whilst the previous LRD application (DLRCC Reg Ref. LRD/24A/0882/WEB) at Knockrabo was permitted, Condition 4 required the omission of Block E, resulting in the loss of 8 No. units. The stated reason for the omission of Block E related to protecting the setting



and amenity of the Protected Structures on site, and protecting and preserving existing trees on site. In this regard, the proposed amendments seek the construction of a new duplex block which is reduced in height and scale, is set back further from the Protected Structures and results in the retention of 1 of the 2 No. category A trees at this location.

4.0 LOCAL PLANNING POLICY AND CONTEXT

4.1 Statutory Development Plan

The site's local planning context is informed by the various local policies and standards that apply to the site, and therefore, the proposed development scheme. The Planning Application has been framed having regard to this policy context and the key provisions of the *Dún Laoghaire Rathdown County Development Plan 2022-2028*. A policy review is included here.

The Core Strategy Housing Target, as shown in Table 5.1, provides a housing target of 18,515 units for Dún Laoghaire-Rathdown for the period of 2020-2028. The subject site is identified as a location for Infill/Windfall units in the Development Plan's Residential Development Capacity Audit – Aggregate Data figure below.

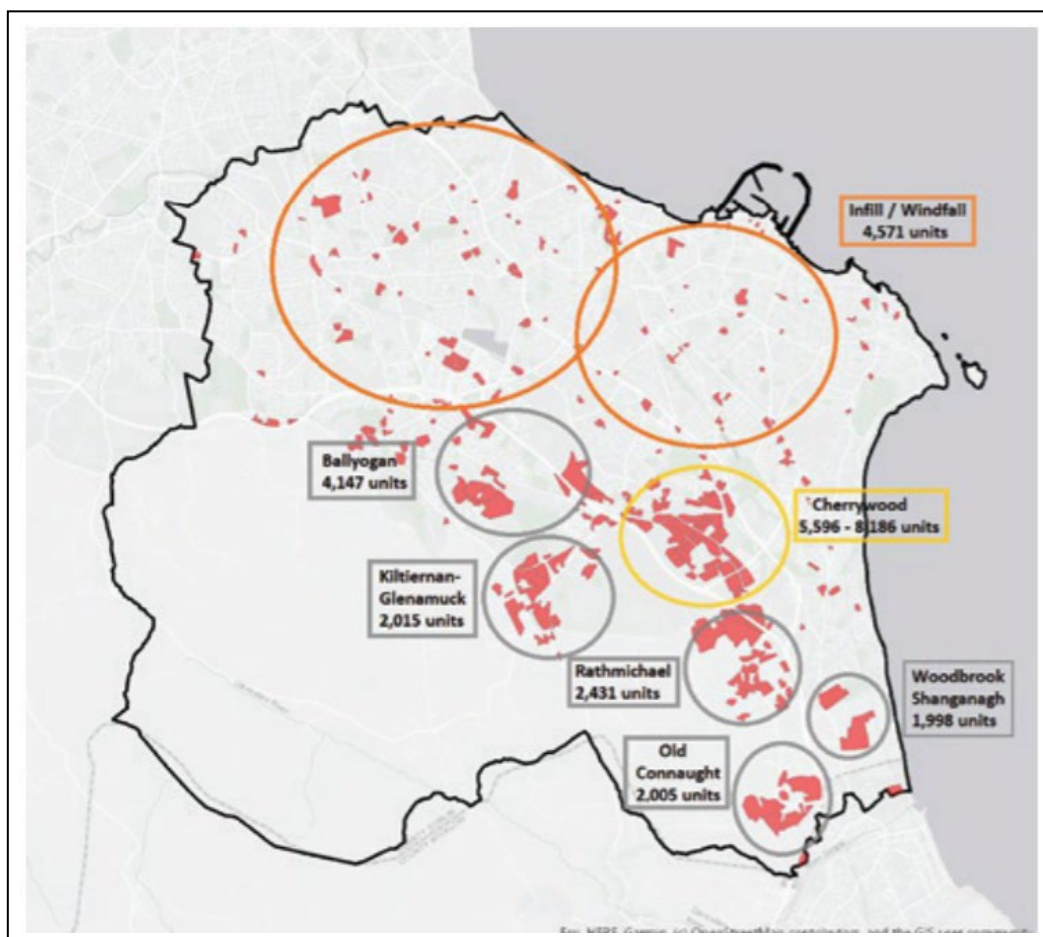


Figure 4.1: Residential Development Capacity Audit – Aggregate Data. (Source: *Dún Laoghaire Rathdown County Development Plan 2022-2028*.)

	2016	Q1 2028 – RSES High Growth Scenario
Population	218,000	256,125
Increase in Population	N/A	38,125
Total Housing Stock	86,962	110,969

Housing Target (2016 – Q1 2028)	N/A	24,007
Minus CSO Housing Completions (2017 – Q1 2021) + Estimated Completions Q2 2021 – Q1 2022)	N/A	5,492
Housing Target (Q2 2022 – Q1 2028)	N/A	18,515

Table 4.1: Core Strategy Housing Target. (Source: Dún Laoghaire Rathdown County Development Plan 2022-2028, as amended.

4.2 Statutory Development Plan

In the *County Development Plan*, the subject site is zoned Objective A – ‘To provide residential development and improve residential amenity while protecting the existing residential amenities’, as shown in Figure 4.2 below.



Figure 4.2: Extract from Zoning Maps 1 and 2 in Dun Laoghaire-Rathdown County Council Plan 2022 - 2028. Subject site with LRD Parent Planning Application (DLRCC Reg. Ref. LRD241/0882/WEB) site boundary outlined in red, and focussed site area which is the subject of the current planning application outlined in green (Source: Dún Laoghaire Rathdown Draft County Development Plan 2022 -2028)

ZONING OBJECTIVE ‘A’
<i>‘To provide residential development and improve residential amenity while protecting the existing residential amenities’</i>
Permitted in Principle
<i>Assisted Living Accommodation, Community Facility^a, Childcare Service^a, Doctor/Dentist etc.^a, Education^a, Health Centre/ Healthcare Facility^a, Open Space, Public Services, Residential, Residential Institution, Travellers Accommodation.</i>
Open For Consideration

Allotments, Aparthotel, Bring Banks/Bring Centres, Carpark ^b, Caravan/Camping Park- Holiday, Caravan Park-Residential, Cemetery, Cultural Use, Embassy, Enterprise Centre, Funeral Home, Garden Centre/Plant Nursery, Guest House, Home Based Economic Activities, Hotel/Motel, Household Fuel Depot, Industry-Light, Part Off-License, Office Based Industry ^c, Offices less than 200sq.m. ^c, Offices in excess of 200 sq.m. ^d, Service Station, Place of Public Worship, Public House, Residential – Build to Rent, Restaurant, Service Garage, Shop Neighbourhood, Student Accommodation, Sports Facility, Tea Room/Café, Veterinary Surgery
a: Where the use will not have adverse effects on the 'A' zoning objective, 'to provide residential development and improve and improve residential amenity while protecting existing residential amenities'
b: Only as an ancillary component of and directly connected to the primary use and/or ancillary to public transport and/or active travel modes.
c: less than 200sq.m.
d: Only applies to A zoned lands subject to Specific Local Objective 122.

Table 4.2: Uses permitted in principle and open for consideration for lands zoned objective 'A'. (Source: Table 13.1.2 of the *Dún Laoghaire-Rathdown County Development Plan 2022-2028*).

'Residential' uses are 'Permitted in Principle' under the A zoning objective.

The proposed development is considered to be fully compliant with the A Zoning Objective of the Development Plan.

4.3 Protected Structures

There are 2 No. Protected Structures within the LRD Parent Planning Application site boundary. However, these Protected Structures are not located within the focussed site area boundary. The proposed duplex block is proximate to both of these Protected Structures, however we highlight that the separation distance from the Knockrabo Gate Lodge (East) has been increased to address concerns of the DL RCC conservation officer.

The buildings are within in the *Record of Protected Structures* as follows:-

Ref:	783
Structure Name:	Cedar Mount
Location:	Mount Anville Road, Goatstown, Dublin 14
Description:	House
Ref:	796
Structure Name:	Knockrabo Gate Lodge (East)
Location:	Mount Anville Road, Goatstown, Dublin 14
Description:	Gate Lodge (East) (Note: Entrance Gates and Piers also Protected Structures)

Notwithstanding that the Protected Structures are not included within the development boundary and that no works are proposed to the Protected Structures (as works to these structures have been permitted under DL RCC Reg. Ref. LRD24A/0882/WEB), an *Architectural Historic Significance* report is enclosed with this application. It is considered that the proposed development ensures the character and setting of the Gate Lodge West and Cedar Mount is protected.

4.3.1 Protected Structures Policies of the Development Plan

Policy HER8: Work to Protected Structures of the Development Plan states the following:

“It is a Policy Objective to:

- I. Protect structures included on the RPS from any works that would negatively impact their special character and appearance.*
- II. Ensure that any development proposals to Protected Structures, their curtilage and setting shall have regard to the ‘Architectural Heritage Protection Guidelines for Planning Authorities’ published by the Department of the Arts, Heritage and the Gaeltacht.*
- III. Ensure that all works are carried out under supervision of a qualified professional with specialised conservation expertise.*
- IV. Ensure that any development, modification, alteration, or extension affecting a Protected Structure and/or its setting is sensitively sited and designed, and is appropriate in terms of the proposed scale, mass, height, density, layout, and materials.*
- V. Ensure that the form and structural integrity of the Protected Structure is retained in any redevelopment and that the relationship between the Protected Structure and any complex of adjoining buildings, designed landscape features, or views and vistas from within the grounds of the structure are respected.*
- VI. Respect the special interest of the interior, including its plan form, hierarchy of spaces, architectural detail, fixtures and fittings and materials.*
- VII. Ensure that new and adapted uses are compatible with the character and special interest of the Protected Structure.*
- VIII. Protect the curtilage of protected structures and to refuse planning permission for inappropriate development within the curtilage and attendant grounds that would adversely impact on the special character of the Protected Structure.*
- IX. Protect and retain important elements of built heritage including historic gardens, stone walls, entrance gates and piers and any other associated curtilage features.*
- X. Ensure historic landscapes and gardens associated with Protected Structures are protected from inappropriate development (consistent with NPO 17 of the NPF and RPO 9.30 of the RSES).”*

Policy HER9: Protected Structures Applications and Documentation of the Development Plan states the following:

“It is a Policy Objective to require all planning applications relating to Protected Structures to contain the appropriate level of documentation in accordance with Article 23 (2) of the Planning Regulations and Chapter 6 and Appendix B of the ‘Architectural Heritage Protection Guidelines for Planning Authorities’, or any variation thereof.”

Policy HER10: Protected Structures and Building Regulations of the Development Plan states the following:

“It is a Policy Objective to protect the character and special interest of Protected Structures when considering or carrying out interventions to comply with the requirements of the Building Regulations - with particular reference to Part B and Part M.”

Policy HER11: Energy Efficiency of Protected Structures of the Development Plan states the following:

“It is a Policy Objective to have regard to the Department of Environment, Heritage and Local Government’s publication on ‘Energy Efficiency in Traditional Buildings’ (2010) and the Irish Standard IS EN 16883:2017 ‘Conservation of Cultural Heritage - Guidelines for Improving the Energy Performance of Historic Buildings’ (2017) and any future advisory documents in assessing proposed works on Protected Structures.”

Section 12.11.2: Architectural Heritage - Protected Structures of the Development Plan states the following:

“All planning applications for works to a Protected Structure must include an Architectural Heritage Impact Assessment in accordance with Appendix B of the DAHG ‘Architectural Heritage Protection Guidelines for Planning Authorities’, to assist in the assessment of proposals. This report should be prepared by an accredited conservation architect or equivalent (a list of suitably qualified professionals is available on the Irish Georgian Society and RIAI websites). The report should:

- Outline the significance of the building(s).*
- Include a detailed survey of the building identifying all surviving original/early features and associated photographic survey.*
- Include a method statement and specification of works.*
- Details of proposed works should be clearly identified on the accompanying survey drawings by way of colour coding and/or annotated notes to distinguish clearly between the existing structure and the proposed work.”*

Section 12.11.2.2: Change of Use of a Protected Structure of the Development Plan states the following:

“In most instances the original use for which a structure was built will be the most appropriate. However, in certain cases a change of use may be considered appropriate and may help to safeguard the Protected Structure status of a building.

In assessing a proposed change of usage, or the reuse of a redundant building, regard should be had to the compatibility of such use, in terms of its impact on the character, and special interest of the structure. All proposed changes of use must comply with the zoning objectives for the site.

Any interventions that are necessitated by such works, should seek to cause minimum interference with the floor plan, and fabric of the building when complying with relevant Building Regulations. Matters such as, fire protection, sound proofing, servicing and access will require detailed consideration at initial design stage.”

Section 12.11.2.3: Development within the Grounds of a Protected Structure of the Development Plan states the following:

“Any proposed development within the curtilage, attendant grounds, or in close proximity to a Protected Structure, has the potential to adversely affect its setting and amenity. The overall guiding principle will be an insistence on high quality in both materials, and design, which both respects and complement the Protected Structure, and its setting.

Any development must be consistent with conservation policies and the proper planning and sustainable development of the area. Considering recent changes to National Policy, (including the 20128 DHPLG, ‘Urban Development and Building Heights Guidelines for Planning Authorities’, a balance must be struck between allowing compact development, while protecting the Architectural heritage and historic building stock within the County.

All planning applications for development in proximity to a Protected Structure must be accompanied by a design statement, with supporting illustrative material, demonstrating how it has been developed having regard to the built heritage, topography, and landscape character of the site. An accredited conservation architect or equivalent should be engaged at the outset of the design process to assist in determining the appropriate siting of the development in order to minimise the impact on the Protected Structure. It may be of benefit to discuss specific requirements, at pre-planning stage.”

The Protected Structures and their setting have informed the development of the proposed scheme. We highlight that no works are proposed to the existing Protected Structures as part of the scheme. However, the design process for the proposed development has had regard to the relevant conservation/protected structure policies of the Development Plan, as well as the comments of the DLRCC Conservation Officer. The proposed location of the duplex block has been altered to provide a greater separation distance to the Gate Lodge East. The scale, design and massing of the proposed block has also been reduced to minimise any potential for impacts on the Gate Lodge East.

The *Design Statement* prepared by OMP Architects sets out the design principles for the proposed development. An *Architectural Historic Significance* report has been prepared by Slattery Architects in respect of the subject site and proposed development.

In respect of potential impacts on Cedar Mount, the *Architectural Historic Significance* report concludes:

“The impact of the proposed duplex building on Cedar Mount House and its front setting is minimal...It is located at some distance (42m) from Cedar Mount House.”

In respect of potential impacts on the Gate Lodge West, the *Architectural Historic Significance* report concludes:

“The main gate lodge, Knockrabo Gate Lodge (East) which is extant today shows more architectural elements of interest than Knockrabo Gate Lodge (West). Therefore, Knockrabo Gate Lodge (West) can be considered less significant. The effect

of the proposed duplex building on Knockrabo Gate Lodge (West) will be minimal as the extant mature trees will provide a screening between both buildings.”

Refer to the *Architectural Historic Significance* report prepared by Slattery Architects for further information.

In our opinion, the application represents a considered proposal, which seeks to respect the existing character of the protected structures, in compliance with Development Plan standards.

4.4 Compliance with Residential Accommodation Policies of the Development Plan

Residential Density

Section 4.3.1.1 of the Development Plan relates to residential density and contains Policy PHP18: Residential Density which states the following:

“It is a Policy Objective to:

- Increase housing (houses and apartments) supply and promote compact urban growth through the consolidation and re-intensification of infill/ brownfield sites having regard to proximity and accessibility considerations, and development management criteria set out in Chapter 12.*
- Encourage higher residential densities provided that proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area, with the need to provide for high quality sustainable residential development.”*

The overall proposed development has a residential density of c.92 units per hectare (red line net density) and now provides a net density of 64 units per hectare across the overall Knockrabo lands³. Having regard to the locational characteristics of the subject site, is compliant with local and national policy objectives which emphasise the requirement for increased residential densities on well-located sites in existing urban areas.

This submission confirms that the proposed development has been designed to an appropriate scale to ensure it does not give rise to unacceptable impact upon the surrounding context from both a residential amenities and visual impact perspective.

³ We note the comments outlined within the DLRCC’s Planners Report of the permitted scheme in respect of residential density calculations, which raised concerns with the exclusion of the access route for the DEBP and portions of public open space around Cedar Mount. For consistency, net residential density has been calculated using the same methodology as the permitted development – these are the above-presented density figures.

To adequately respond to the concerns outlined within the DLRCC Planners Report, we highlight the following net residential densities which incorporate the access route for the DEBP and portions of public open space around Cedar Mount (which are not included above):

Net Density (Overall Knockrabo Lands) – 55 units per hectare;
Net Density (Redline Area) = 68.6 units per hectare.

For clarity, the densities outlined throughout this report will exclude the access route for the DEBP and portions of public open space around Cedar Mount (to ensure consistency with densities presented under the permitted LRD documentation).

Residential Density is discussed in Section 6.9 of the Statement of Consistency, in relation to Compliance with Development Management Standards outlined in the Development Plan.

Housing Mix

Section 4.3.2.3 of the *Plan* relates to housing mix and contains Policy PHP27: Housing Mix which states:

“It is a Policy Objective to encourage the establishment of sustainable residential communities by ensuring that a wide variety of housing and apartment types, sizes and tenures is provided throughout the County in accordance with the provisions of the Housing Strategy and Housing Need Demand Assessment (HNDA) and any future Regional HNDA.”

The proposed development provides for two bedroom (four person), three-bedroom duplexes. The 6 No. duplex units will provide a new form of housing in the wider local area, and represent a coherent extension of the Knockrabo Phase 1 and 2 lands.

Please refer to the enclosed architectural pack and *Design Statement*, prepared by OMP Architecture, which outlines further information in relation to unit type, mix and associated facilities.

Part V

Policy PHP31: Provision of Social Housing in section 4.3.2.6 of the Development Plan notes the following respect of Social Housing (Part V):

“It is a Policy Objective to promote the provision of social housing in accordance with the Council’s Housing Strategy and Government policy as outlined in the DoHPLG ‘Social Housing Strategy 2020’. The Affordable Housing Act 2021 provides for 20% for social and affordable homes.”

The proposed development is subject to the requirements of the Part V of the Planning and Development Act 2000 (as amended). In order to comply with Part V of the Acts, Knockrabo Investments DAC (the prospective Applicant) proposed to provide 10% of the proposed units on site as part of the permitted scheme (DLRCC Reg. Ref. LRD241/0882/WEB), pursuant to section 96(3)(i) of the Acts. This equated to 15 No. units (3 No. 1 bed units and 9 No. 2 bed units and 3 No. 3 bed units) located within Block G of the permitted scheme.

Whilst Condition 4 of the grant of planning permission required the omission of the previously proposed Block E (consisting of 8 No. units) the proposed Part V provision remained the same as what was initially proposed under the 158 No. unit proposal. The proposed development results in the total provision of 156 No. units across Knockrabo Phase 2 lands – therefore the agreed provision of 15 No. units therefore satisfies the Part V requirements.

Notwithstanding this, a revised *Validation Letter – Part V*, dated 25th September 2025 has been issued by DLRCC to the Applicant in respect of the proposed development, which is submitted with this application.

Sustainable Neighbourhoods

Policy PHP2: Sustainable Neighbourhood Infrastructure states the following:

“It is a Policy Objective to:

- Protect and improve existing sustainable neighbourhood infrastructure as appropriate.*
- Facilitate the provision of new sustainable neighbourhood infrastructure that is accessible and inclusive for a range of users consistent with RPO 9.13 and RPO 9.14 of the RSES.*
- Encourage the provision of multi-functional facilities, space and lands in the delivery and/or improvement of sustainable neighbourhood infrastructure.”*

The proposed development opens the subject site to public access, primarily by pedestrians and cyclists.

Healthy Placemaking

Policy PHP35: Healthy Placemaking of the Development Plan states the following:

“It is a Policy Objective to:

- Ensure that all development is of high quality design with a focus on healthy placemaking consistent with NPO 4, 26 and 27 of the NPF, and RPO 6.1, 6.12, 9.10 and 9.11 of the RSES.*
- Promote the guidance principles set out in the ‘Urban Design Manual – A Best Practice Guide’ (2009), and in the ‘Design Manual for Urban Roads and Streets’ (2013).*
- Ensure that development proposals are cognisant of the need for proper consideration of context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy and amenity, parking, wayfinding and detailed design.”*

The proposed development has been designed in accordance with the above and provides for an attractive environment for residents and visitors.

Policy PHP36: Inclusive Design & Universal Access of the Development Plan states the following:

“It is a Policy Objective to promote and support the principles of universal design ensuring that all environments are inclusive and can be used to the fullest extent possible by all users regardless of age, ability or disability consistent with RPO 9.12 and 9.13 of the RSES.”

The proposed buildings have been designed to universal access standards providing for universal access.

Policy PHP40: Shared Space Layouts of the Development Plan states the following:

“It is a Policy Objective to promote safer and more attractive streets and public realm for all road users throughout the County by proactively engaging with, and adhering to, the ‘shared space’ concept and guidance set out in the ‘Design Manual for Urban Roads and Streets’ (2013).”

The proposed development is fully compliant with DMURS and the Development Plan in this regard.

Policy T11: Walking and Cycling of the Development Plan states the following:

“It is a Policy Objective to secure the development of a high quality, fully connected and inclusive walking and cycling network across the County and the integration of walking, cycling and physical activity with placemaking including public realm and permeability improvements. (Consistent with NPO 27 and 64 of the NPF and RPO 5.2 of the RSES)”

The proposed development accommodates pedestrian activity throughout the site incorporating walking routes. Cycle parking is located proximate to the proposed block, providing convenient access for residents and visitors. The scheme facilitates pedestrian/cyclist connections to adjoining Phase 1 and 2 lands, as well as to the DEBP Corridor.

Policy T17: Travel Plans of the Development Plan states the following:

“It is a Policy Objective to require the submission of Travel Plans for developments that generate significant trip demand (reference also Appendix 3 for Development Management Thresholds). Travel Plans should seek to reduce reliance on car based travel and encourage more sustainable modes of transport over the lifetime of a development. (Consistent with RPO 8.7 of the RSES)”

A Travel Plan was prepared by Waterman Moylan Consulting Engineers and submitted with the parent planning application in compliance with Policy T17. The proposed development is located within 1.5km of the Dundrum and Balally Luas stops, in addition to 2-3 minute walking distance from bus stops on Mount Anville Road and the Drummartin Road. The proposed development will encourage more sustainable modes of transport. The proposed development will provide for 22 No. bicycle parking spaces, further promoting a shift to sustainable modes of transport – with cycle parking provision exceeding Development Plan and Compact Settlement Guidelines (2024) minimum standards.

Policy T26: Traffic and Transport Assessments and Road Safety Audits of the Development Plan states the following:

“It is a Policy Objective to require Traffic and Transport Assessments and/or Road Safety Audits for major developments – in accordance with the TII’s ‘Traffic and Transport Assessment Guidelines’ (2014) - to assess the traffic impacts on the surrounding road network and provide measures to mitigate any adverse impacts - all in accordance with best practice guidelines.”

A *Traffic and Transport Assessment* including a *Road Safety Audit* was prepared by Waterman Moylan and submitted with the parent planning application. The TTA demonstrated the permitted development (LRD24A/0882/WEB) can be accommodated at the subject site with a negligible impact on the receiving transportation network, which has ample spare capacity to cater for the modest volumes of traffic generated.

The *Road Safety Audit* process identified some items that were subsequently addressed.

Policy T27: Traffic Noise of the Development Plan states the following:

"It is a Policy Objective to ensure that traffic noise levels are considered as part of new developments along major roads/rail lines in accordance with best practice guidelines."

The subject site is located a sufficient distance from Mount Anville Road such that no undue adverse impact from these facilities will be experienced by residents of the scheme. The proposed development benefits from screening from both existing mature trees as well as proposed tree planting.

4.5 Compliance with Development Management Policies of the Development Plan

Design Statements

Policy PHP44: Design Statements in Section 4.4.1.10 of the *Plan* requires the preparation of Design Statements for residential developments:

"It is a Policy Objective that, all medium to-large scale and complex planning applications (30 + residential units, commercial development over 1,000 sq.m. or as otherwise required by the Planning Authority) submit a 'Design Statement' and shall be required to demonstrate how the proposed development addresses or responds to the design criteria set out in the 'Urban Design Manual - A Best Practice Guide' (DoEHLG, 2009) and incorporates adaptability of units and/or space within the scheme."

A *Design Statement* prepared by OMP Architects is enclosed, this responds to the *Urban Design Manual - A Best Practice Guide, 2009*.

Policy PHP37: Public Realm Design and Policy PHP38: Public Realm Offering, in section 4.4.1.3 of the *Plan* states the following in respect of public realm:

"It is a Policy Objective that all development proposals, whether in established areas or in new growth nodes, should contribute positively to an enhanced public realm and should demonstrate that the highest quality in public realm design is achieved."

"It is a policy objective to preserve and enhance the public realm offering in our towns and villages."

Dún Laoghaire-Rathdown County Council recognises the social and non-commercial value of the public realm and commercial activity is not the sole objective of outdoor public realm improvements. The Council will develop an outdoor realm policy that will enhance offerings including, but not limited to, street furniture; pedestrianisation of

streets; outdoor vendors; safe, public breastfeeding spaces and litter management. All ages and backgrounds should be included in the consideration of public realm improvements.”

The design of the proposed buildings has also maximised the amount of active frontage at ground floor level to ensure natural surveillance and a positive relationship between the buildings and proposed public realm.

Importantly, the proposed development will also provide a significant quantum of public open space which incorporates large areas of green space, existing mature landscape features and shared surface/hard landscaped areas.

In accordance with this policy, DFLA has prepared the enclosed *Landscape Design Rationale* which illustrates the design rationale for the landscaping and measures proposed to ensure that the development complements the surrounding area and contributes positively to an enhanced public realm.

Building Height/Design

Policy PHP42: Building Design and Height Section of the *Development Plan* states the following in respect of building height:

“It is a Policy Objective to:

- *Encourage high quality design of all new development.*
- *Ensure new development complies with the Building Height Strategy for the County as set out in Appendix 5 (consistent with NPO 13 of the NPF).”*

Appendix 5 ‘*Building Height Strategy*’ further details *Development Plan* policy in relation to building height.

In relation to a ‘Residual Suburban Area⁴’, Section 1.1 of the Building Height Strategy outlines the changes made to the previous *Development Plan* (2016-2022):

“In order to align with guidance⁵, the maximum heights for what were called the residual suburban areas have been removed, as have the upward and downward modifiers. They have been replaced with a very comprehensive set of performance-based criteria for development management assessment of applications for increased height thus ensuring increased height in appropriate location, whilst protecting residential amenity and other assets of the County.”

Section 4.3 of the Building Height Strategy identifies amenity and environmental considerations, some of which apply to the site to various degrees:

*“The Guidelines state that “Appropriate identification and siting of areas suitable for increased densities and height will need to **consider the environmental sensitivities***

⁴ Areas not covered by an existing or forthcoming Local Area Plan or other guidance/policy as set out in this plan and not falling into objective F, B, G or GB are termed residual suburban areas.

⁵ Referring to “Urban Development and Building Heights, Guidelines for Planning Authorities” (December 2018).

*of the receiving environment as appropriate, throughout the planning hierarchy.” There are a number of environmental sensitivities in the County of DLR which contribute to the uniqueness and identity of the County. **These sensitivities have fed into the formulation of the performance based criteria** set out in section 5.*

4.3.1 Architectural Conservation Areas There are 26 designated Architectural Conservation Areas (ACAs). Policy AR8: Architectural Conservation Areas (ACA) states that it is Council policy to protect the special character of places, areas, groups of structures or townscapes, which have been designated as Architectural Conservation Areas. While the purpose of a designation is to protect and enhance the special character of an area, it is important to stress that this does not preclude any appropriate forms of new development. Impact on ACAs is included in the Performance Based Criteria set out in Section 5.

4.3.2 Protected Structures Dún Laoghaire-Rathdown features a wealth of built heritage that has been amassed over many centuries through previous generations. Our built heritage including a varied array of Protected Structures. The central issue in relation to our built heritage is striking a balance between the protection and enhancement of this enviable heritage asset while ensuring the continued development of the County through the 21st Century. New developments should respond to local character and protect and enhance the built heritage and new buildings should not have an adverse effect on a protected structure in terms of scale, height, massing, alignment and materials. Impact on Protected Structures is included in the Performance Based Criteria set out in Section 5.”

[Our emphasis.]

Section 4.4 (Policy Approach) of the Building Height Strategy further states:

***“To ensure application of the 4 SPPRs and having regard to the other content of the Guidelines a number of policies have been formulated, which support increased building height and/or taller buildings at appropriate locations while ensuring adequate protection of residential amenities and the very unique character and environmental sensitivities of the County.** A very detailed Performance Management Criteria table has also been developed. It is overall policy that all proposals for increased height and/or taller buildings;*

- ***over and above the benchmarks of three to four storeys in what are called residual suburban areas***
- *in other identified areas as set out in Policy BH1 below*
- *above what is set out in any of the Local Area Plans or*
- *above any other specified heights in this plan (SUIP)*

must be assessed in accordance with the criteria set out in Section 5.

Areas not covered by an existing or forthcoming Local Area Plan or other guidance and not covered by any particular environmental sensitivity as set out above are termed residual suburban areas. The Cherrywood area is covered by the approved Planning scheme as amended. Areas zoned G, GB, B and F have some of the most restrictive zoning objectives in the County. A small number of uses are either permitted in

principle or open for consideration. There may sometimes in these areas be instances where there may be an argument for increased building heights and this may be acceptable subject to meeting the overall zoning objective for the area and subject to the development being appropriate in terms of its scale, height and massing. Given the restrictive zoning objectives on these lands the possibility of taller buildings is effectively negated."

[Our emphasis.]

Section 4.4.1.8 of the Development Plan notes the following in respect of building height:

"The Council policy in relation to building height throughout the County is detailed in three policy objectives as set out in the Building Height Strategy (BHS) (Appendix 5):

- *Policy Objective BHS 1- Increased Height.*
- *Policy Objective BHS2 – Building Height in areas covered by an approved Local Area Plan or Urban Framework Plan (UFP must form part of the County Plan).*
- ***Policy Objective BHS 3 - Building Height in Residual Suburban Areas.***

The BHS also contains a detailed set of performance-based criteria for the assessment of height so as to ensure protection of the unique amenities of the County whilst also allowing increased height.

In accordance with the policies set out in the BHS, where an argument is being made for increased height and/or a taller building and the Applicant is putting forward the argument that SPPR 3 of the 'Urban Development and Building Height; Guidelines for Planning Authorities' (2018) applies, the Applicant shall submit documentation to show that compliance with the criteria as set out in Table 5.1 'Performance Based Criteria' of the BHS (see Appendix 5)."

[Our emphasis.]

Policy Objective BHS 3 Building Height in Residual Suburban Areas states:

"It is a policy objective to promote general building height of 3 to 4 storeys, coupled with appropriate density in what are termed the residual suburban areas of the County provided that proposals ensure a balance between the reasonable protection of existing amenities including residential amenity and the established character of the area.

Having regard to the Building Height Guidelines and more specifically in order to apply SPPR 3 there may be instances where an argument can be made for increased height and/or taller buildings in the residual suburban areas. Any such proposals must be assessed in accordance with the criteria set out below in table 5.1 as contained in Section 5. The onus will be on the applicant to demonstrate compliance with the criteria.

Within the built up area of the County increased height can be defined as buildings taller than prevailing building height in the surrounding area. Taller buildings are defined as those that are significantly taller (more than 2 storeys taller) than the prevailing height for the area."

The Strategy acknowledges that greater height can be provided on lands where it can be demonstrated that the proposal complies with the criteria outlined in Table 5.1 under Section 5 of Appendix 5, Building Height Strategy.

Notwithstanding this, we highlight that the proposed development is not considered to represent an example of an 'increased height' when considered against the existing prevailing heights in the vicinity of the subject site, and having regard to the proposal comprising only a part 2 and part 3 storey duplex block.

Having regard to the proposed height, an assessment against Table 5.1 under Section 5 of Appendix 5 (Building Height Strategy) is not required in this instance.

Minimum Storage Space Requirements

Table 12.3 of the Plan outlines the Minimum Storage Space Requirements for residential developments. An extract of this is provided below

Minimum Requirements
One Bedroom 3 sq.m.
Two Bedroom (3 person) 5 sq. m.
Two Bedroom (4 person) 6 sq. m.
Three Bedroom 9 sq.m.

Figure 6.1: Apartment Mix Requirements. (Source: *Dún Laoghaire Rathdown County Development Plan 2022- 2028*.)

In addition, the following requirements are noted;

- *Storage should be additional to kitchen presses and bedroom furniture.*
- *Hot press/boiler space will not count as general storage.*
- *No individual storage room should exceed 3.5 sq.m. and shall be provided within the apartment unit.*
- *Apartment schemes should provide external storage for bulky items outside individual units (i.e. at ground or basement level), in addition to the minimum apartment storage requirements. These storage units should be secure, at ground floor level, in close proximity to the entrance to the apartment block and allocated to each individual apartment unit.*

Details of appropriate storage provided as part of the proposed unit layouts have been prepared and are outlined in the enclosed drawing pack prepared by OMP Architects. The scheme is compliant in this regard.

Unit Mix

Development Plan Table 12.1: Apartment Mix Requirements requires that a minimum of 20% of apartments in schemes of 50+ Units in built up areas must be 3+ bed units.

Area	Threshold	Mix Studio/1/2 bed Requirement (Apartments and duplexes)	3+ bed Requirement (Apartments)
New Residential Community (See figure 2.9 Core Strategy Map)	Schemes of 50+ units	Apartment Developments may include up to 60% studio, one and two bed units and with no more than 30% of the overall development as a combination of one bed and studios and no more than 20% of the overall development as studios	Minimum 40% 3+ bedroom units
Lands within SUFP	Schemes of 50+ units	Apartment Developments may include up to 60% studio, one and two bed units with no more than 30% of the overall development as a combination of one bed and studios and no more than 20% of the overall development as studios	Minimum 40% 3+ bedroom units
Existing Built up area.	Schemes of 50+ units	Apartment Developments may include up to 80% studio, one and two bed units with no more than 30% of the overall development as a combination of one bed and studios and no more than 20% of the overall development as studios	Minimum 20% 3+ bedroom units

Figure 6.2: Table 12.1 of the Development Plan, Apartment Mix Requirements. (Source: *Dún Laoghaire-Rathdown County Development Plan 2022-2028*.)

Unit Type	Number	Percentage of Total Apt Units
2 bed duplex apartment	4	67%
3 bed duplex apartment	2	33%
Total	6 No.	100%

We note SPPR 1 of the 'Planning Design Standards for Apartments Guidelines for Planning Authorities' (2025) (The 'Apartment Guidelines') outlines that there shall be no unit mix requirements within apartment developments. In any case, the proposed unit mix accords with Table 12.1 of the development plan in respect of 3+ bed apartment unit provision.

In addition, Section 12.3.3 of the Development Plan requires that applications received in both new residential communities and within the residual built up area shall include:

- *Details of existing and permitted unit types within a 10-minute walk of the proposed development.*
- *A detailed breakdown of the proposed unit type and size including a percentage split between 1/2/3+ bed units which in the case of apartments (and duplexes) shall generally be in accordance with Table 12.1.*
- *A site and/or floor plans that clearly identify proposed units that:*
 - *Are designed and located having regard to the needs of older people and/or persons with a disability.*
 - *Are designed having regard to the concept of lifetime adaptable and/or multigenerational homes.*
- *A statement outlining how the scheme has been designed for the needs of older people and / or persons with a disability and / or lifetime homes.*
- *No more than 10% of the total number of units in any private residential development may comprise of two-bedroom three-person apartment types."*

In accordance with the Development Plan, a variety of dwelling unit types and sizes are proposed as part of the scheme, which will be suitable for a variety of household types. The

scheme provides 33% 3+ bed units through duplex apartment units. In addition, we note that the proposed floor plans, prepared by OMP Architects, demonstrate that the units are designed in accordance with Part M of the Building Regulations and the needs of older people and/or persons with a disability are met.

Residential Density

The Development Plan states that site densities should be determined with reference to the *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities’ (2009)*, as outlined in Section 12.3.3.2:

“In general, the number of dwellings (houses or apartments) to be provided on a site should be determined with reference to the Government Guidelines documents:

- *‘Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities’ (2009).*
- *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities (2020).”*

The overall proposed development has a residential density of c.92 units per hectare (red line net density) and now provides a net density of 64 units per hectare across the overall Knockrabo lands. The locational characteristics of the site in the context of residential density is further discussed in relation to national guidelines and Policy RES5 in Section 3.1, 3.3, 3.5, 3.11 of the Statement of Consistency.

We contend that this is appropriate for the subject site, having regard to National Planning Framework, which promotes higher residential densities at well located, serviced urban locations.

Car Parking Standards

Car parking requirements are set out in Section 12.4 and Table 12.5 of the Development Plan. The subject site is located in Parking Zone 3.

Land Use		Zone 1 MTC Areas and Blackrock	Zone 2 Near Public Transport	Zone 3 Remainder of County (non-rural)	Zone 4 Rural
Houses:	Criterion	Maximum	Standard	Standard	Standard
House 1 bed	unit	1	1	1	Case by case
House 2 bed	unit	1	1	1	Case by case
House 3 bed or more	unit	1	2	2	Case by case
Apartments and Sheltered Housing:					
Apt 1 bed	unit	1	1	1*	Case by Case
Apt 2 bed	unit	1	1	1*	Case by Case
Apt 3 bed +	unit	1	2	2*	Case by Case
Education:	Criterion	Maximum	Maximum	Maximum	Maximum
Childcare	GFA (including set down)	1 per 80	1 per 60	1 per 40	1 per 40
Community:	Criterion	Maximum	Maximum	Maximum	Maximum
Community facility, library, museum, art gallery	GFA	1 per 150	1 per 100	1 per 50	1 per 50

Figure 6.3: Car Parking Zones and Standards. (Source: *Dún Laoghaire Rathdown County Development Plan 2022- 2028.*)

Based on the above standards, using the maximum provision up to 7 No. residential car parking spaces would be required to serve the proposed development.

8 No. car parking spaces are provided throughout the scheme including 7 No. residential car parking spaces (1 No. of which is an accessible space) and 1 No. visitor space.

Section 12.4.5.2 of the *Development Plan* note deviations from standards are acceptable in some circumstances:

- *“Proximity to public transport services and level of service and interchange available.*
- *Walking and cycling accessibility/permeability and any improvement to same.*
- *Availability of car sharing and bike / e-bike sharing facilities.*
- *Particular nature, scale and characteristics of the proposed development.”*

The Plan further states that ‘Any surface carparking should be suitably integrated into the site with soft landscaping proposals and have regard to SuDS’.

In addition, dimension of parking bays are noted within the Plan, and proposed car parking bays are fully compliant with Development Plan standards in this regard.

The proposed development provides 7 No. residential car parking spaces at a ratio of 1.16 spaces per unit, which having regard to the proximity to high quality public transport, mobility

management measures and the central management associated with the development results in an appropriate level of provision.

In this regard, we note that the previous car parking ratio permitted under LRD Reg. Ref. LRD24A/0882/WEB of 0.74 was deemed to be acceptable by the planning authority. The residential car parking across the wider lands (inclusive of the parent application parking provision and the proposed amendment provision) is 117 No. resulting in a ratio of 0.74, in line with the permitted development (prior to the omission of the previously proposed Block E under Condition 4 of DLRCC Reg. Ref. LRD24A/0882/WEB). This ratio is commensurate with precedents for permitted residential Schemes in the County (DLRCC Reg. Ref. LRD22A/0930 and ABP Ref. 318247-23 – parking ratio of 0.45 -we note the application was granted following a first party appeal to ABP; LRD23A/0364).

Moreover, the proposed car parking ratio is fully compliant with the Compact Settlement Guidelines.

Dimensions of the parking bays and location of parking bays for persons with disabilities have been designed using national standards and best practice, and the proposed location and design of parking bays is fully compliant with the Development Plan in this regard.

Bicycle Parking Standards

The importance of bicycle parking is outlined in Section 12.4.6, which notes the requirement for the provision of bicycle parking to accord with ‘*Standards for Cycle Parking and Associated Cycling Facilities for New Developments*’ (2018) or any subsequent review of these standards, as published by Dún Laoghaire-Rathdown County Council. The Plan notes that within zones 1 and 2, the minimum standards set out in this policy document should be exceeded. In this regard, we note 22 No. cycle parking spaces (10 No. visitor spaces and 12 No. long stay spaces) are proposed to be provided throughout the scheme, in compliance with the standards set out under the ‘*Standards for Cycle Parking and Associated Cycling Facilities for New Developments*’ (2018), which require 6 No. residential spaces (short and long stay) (Table 5.6 of *Statement of Consistency* prepared by Tom Phillips + Associates refers).

The Plan outlines the following considerations for bicycle parking within residential developments (of 5 units or more) (Section 12.4.6.2):

- *“Is the number of cycle parking spaces and footprint adequate and is there suitable provision for parking of outsized formats (cargo bikes etc)?*
- *Is the location of cycle parking convenient, appropriate and secure with adequate provision for covered parking?*
- *Is the cycle parking area accessible in terms of dedicated access routes with ramps and/or kerb dishing where required?*
- *Do the internal cycle access routes connect well with off-site cycle facilities – existing and proposed?*
- *Is there adequate and appropriately designed and integrated provision for ancillary cycling and pedestrian facilities including showers, locker / changing rooms and drying areas?”*

Secure long-term cycle parking is required for a development of this scale, and this cycle parking must be covered and '*conveniently located within 50 metres of the destination and located near building access points where possible*'. There is also a requirement for new larger developments to provide cycle route links to the existing cycle network, alongside internal cycle permeability.

Section 12.4.6.1 of the *Plan* requires "*accessible and secure cycle parking, to cater for all types of cycles and for cyclists of all ages and abilities, is provided within new developments.*"

Cycle parking is provided within secure enclosures and near to entrances to buildings, consistent with the Dun Laoghaire Rathdown County Council standards.

Electric Vehicle Parking Standards

Section 12.4.11 of the *Development Plan* relates to the provision of Electric Vehicle charging points.

The Development Plan requires that residential multi-unit developments require a minimum of one car parking space per five car parking spaces should be equipped with one fully functional EV Charging Point. Ducting for every parking space shall also be provided.

For new dwellings with in-curtilage car parking - the installation of appropriate infrastructure to enable installation of a recharging point for EVs at a later stage is required.

The proposed development complies with the requirements relating to EV Parking Facilities. Refer to the *Engineering Statement* prepared Waterman Moylan for further information.

Motorcycle Parking Standards

It is an objective of the Council to require developments to provide motorcycle parking spaces at a minimum of four or more spaces per 100 car parking spaces. The type of motorcycle stand and typical parking layout should be in accordance with the Council's Cycling Policy Guidelines and Standards with a spacing of 1 metre to allow the parking of one motorcycle per stand. 1 No. motorcycle space is provided within the scheme. The dimensions of these spaces accord with relevant standards.

4.5 *Proposal is Compliant with Development Plan*

A full assessment of the proposed development with respect to compliance with Development Plan policies and objectives is presented in the enclosed *Statement of Consistency*, prepared by Tom Phillips + Associates. In summary, having regard to policies and standards prescribed at local levels, it is considered that the proposed development complies with relevant policy and guidance and can be considered to contribute positively to the proper planning and sustainable development of the area. Please refer to the enclosed *Statement of Consistency* for further information.

5.0 CONCLUSION

The proposed development will provide for an LRD consisting of Amendments to a Permitted LRD (DLRCC Reg. Ref. LRD/24A/0882/WEB) at Knockrabo, Mount Anville Road, Goatstown, Dublin 14. The development will include the provision of 6 No. duplex units in 1 No. new 3 storey block.

The scale and form of the proposal has had detailed regard to, inter alia, the permitted development on the adjoining Knockrabo Phase 1 site as well as the permitted development of the parent planning application (LRD24A/0882/WEB), including with respect to elevational design; scale and mass of the permitted development, material choice, and the character of existing protected structures on site.

It is considered that the buildings are of a high architectural design and will constitute a significant positive addition to the visual landscape in the environs of the Application Site, while respecting and enhancing the character of the existing protected structures on the wider Knockrabo lands.

The proposed development will support the development of this underutilised, infill suburban site to a medium density residential use, in accordance with national, regional and local planning policy.

In conclusion, we contend that the development of the site, as per the enclosed plans and particulars;

- Will not result in negative impacts on any Natura 2000 sites.
- Is in compliance with Dun Laoghaire Rathdown County Development Plan 2022-2028.
- Will represent the proper planning and sustainable development of the Subject Site.

We trust that you will find this Application in order. Please do not hesitate to contact me should you have any queries in relation to the proposal.

Yours faithfully,



Stephen Barrett
Director
Tom Phillips + Associates

Encl./

6.0 DOCUMENTS SUBMITTED WITH THIS APPLICATION

The documentation outlined in the following Sections forms part, and is in support of, the subject Pre-Application Meeting.

6.1 LRD Form 18

A duly completed 'Form 19', signed and dated, 28th October 2025.

6.2 Planning Fee

The Planning Application Fee of **€6,776.40** in accordance with the provisions of Section 2, Schedule 9 of the *Planning and Development Regulations, 2001 (as amended)* was paid to Dún Laoghaire-Rathdown County Council by EFT on, 21st October 2025, under the reference "120000076094".

6.3 Statement of Consistency

A *Statement of Consistency*, prepared by Tom Phillips + Associates, dated 28th October 2025.

6.4 Part V Pack and Validation Letter

A *Part V Validation Letter* dated 25th September 2025 provided by Dún Laoghaire-Rathdown County Council is enclosed with this planning application.

6.5 Description of Development

A Copy of the *Description of Development*, prepared by Tom Phillips + Associates (Appendix A of this Report refers).

6.8 Reports

A copy of the following reports:

- This *Planning Report* prepared by Tom Phillips + Associates, dated 28th October 2025;
- A *Statement of Consistency* prepared by Tom Phillips + Associates, dated 28th October 2025;
- A *Response to LRD Opinion*, prepared by Tom Phillips + Associates, dated 28th October 2025;
- An *LRD Design Statement*, prepared by OMP Architects, dated October 2025;
- *Engineering Assessment Report*, prepared by Waterman Moylan Consulting Engineers, dated October 2025;
- A *Response to LRD Opinion*, prepared by Waterman Moylan Consulting Engineers, dated October 2025;
- *Verified Photomontages and CGI's: Proposed Knockrabo Phase 2 Lands, Mount Anville Road, Dublin 14*, prepared by Model Works Ltd, dated October 2025;
- *Design Rationale – Landscape Architecture*, prepared by Dermot Foley Landscape Architects, dated 19th September 2025;

- *An Arboricultural Assessment of the Tree Vegetation on the Site Area for 'Knockrabo Phase 2, Block E', Mount Anville Road, Goatstown, Dublin 14* prepared by Arborist Associates, dated 16th October 2025;
- *Knockrabo Phase 2 – LRD Amended: Daylight, Sunlight and Overshadowing Study*, prepared by IES, dated 23rd October 2025;
- *Report On The Architectural/Historic Significance Of The Knockrabo Site And Setting, Mount Anville Road, Dublin 14*, prepared by Slattery Conservation, dated October 2025;
- *Landscape and Visual Impact Assessment*, prepared by DFLA, dated 25th September 2025.

6.9 Drawings

The following Architectural drawings prepared by OMP Architects.

Drawing Title	Dwg. No.	Scale
Schedule of Accommodation	1307H-OMP-XX-XX-SA-A-6000	A4
Housing Quality Assessment	1307H-OMP-HQA-ZZ-A-SA-0001	N/A
Proposed Site Layout	1307H-OMP-00-00-DR-A-1000	1:500@A1
Site Location Map	1307H-OMP-00-00-DR-A-1011	1:1000@A1
Taking In Charge Plan	1307H-OMP-00-00-DR-A-1013	1:500@A1
Site Sections AA & BB	1307H-OMP-00-00-DR-A-3000	1:250@A1
Site Sections CC & DD	1307H-OMP-00-00-DR-A-3001	1:250@A1
Block E Ground and First Floor Plans	1307H-OMP-BE-ZZ-DR-A-1000	1:100@A1
Block E Second and Roof Floor Plans	1307H-OMP-BE-ZZ-DR-A-1001	1:100@A1
Block E Elevations	1307H-OMP-BE-ZZ-DR-A-2000	1:200@A1
Block E Sections	1307H-OMP-BE-ZZ-DR-A-3000	1:250@A1

The following Engineering drawings prepared by Waterman Moylan Consulting Engineers;

Drawing Title	Dwg. No.	Scale
Site Location Plan	KNB-WMC-PH2-ZZ-DR-C-P1000	1:2000@A1
Proposed Road Layout	KNB-WMC-PH2-ZZ-DR-C-P105	1:500@A1
Road Construction and Finishing	KNB-WMC-PH2-ZZ-DR-C-P1120	1:250@A1
Drainage Layout	KNB-WMC-PH2-ZZ-DR-C-P1200	1:250@A1
Storm Water Drainage Construction Details	KNB-WMC-PH2-ZZ-DR-C-P1220	1:25@A1
Road Construction Details	KNB-WMC-PH2-ZZ-DR-C-P1130	As Shown
Private Drainage Construction Details	KNB-WMC-PH2-ZZ-DR-C-P1221	1:25@A1
Watermain Layout	KNB-WMC-PH2-ZZ-DR-C-P1300	1:250@A1

The following Landscape Architecture drawings prepared by DFLA;

Drawing Title	Dwg. No.	Scale
Landscape Plan	Re.18-DR-2001	1:200@A2
Landscape Sections	Re.18-DR-2400	1:100@A1
Typical Landscape Details	Re.18-DR-2500	1:20@A1

The following Arboricultural drawings prepared by Arborist Associates;

Drawing Title	Dwg. No.	Scale
Tree Protection Plan	KB-P2-E003	1:250@A1
Tree Removal Plan	KB-P2-E002	1:250@A1
Tree Constraints Plan	KB-P2-E001	1:500@A3