

## PLANNING REPORT

### PROPOSED STRATEGIC HOUSING DEVELOPMENT

NO. 2 FIRHOUSE ROAD AND THE FORMER 'MORTON'S, THE FIRHOUSE INN', FIRHOUSE ROAD, DUBLIN 24



**PREPARED FOR:**  
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(FIRHOUSE) LIMITED

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**June 2022**

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## 1.0 INTRODUCTION

Tom Phillips + Associates, Town Planning Consultants, is instructed Bluemont Developments (Firhouse) Limited (referred to from hereon as the 'Applicant'), to submit this planning application for a Strategic Housing Development (SHD) on lands at No. 2 Firhouse Road and the former 'Morton's, The Firhouse Inn', Firhouse Road, Dublin 24.

The proposed development will provide a mixed-use development, comprising 100 No. new homes. As well as responding to acute housing need, the proposed development will provide a mix of non-residential uses and approximately c. 1,347 sq m of public open space which has been carefully designed to serve both the new and existing communities.

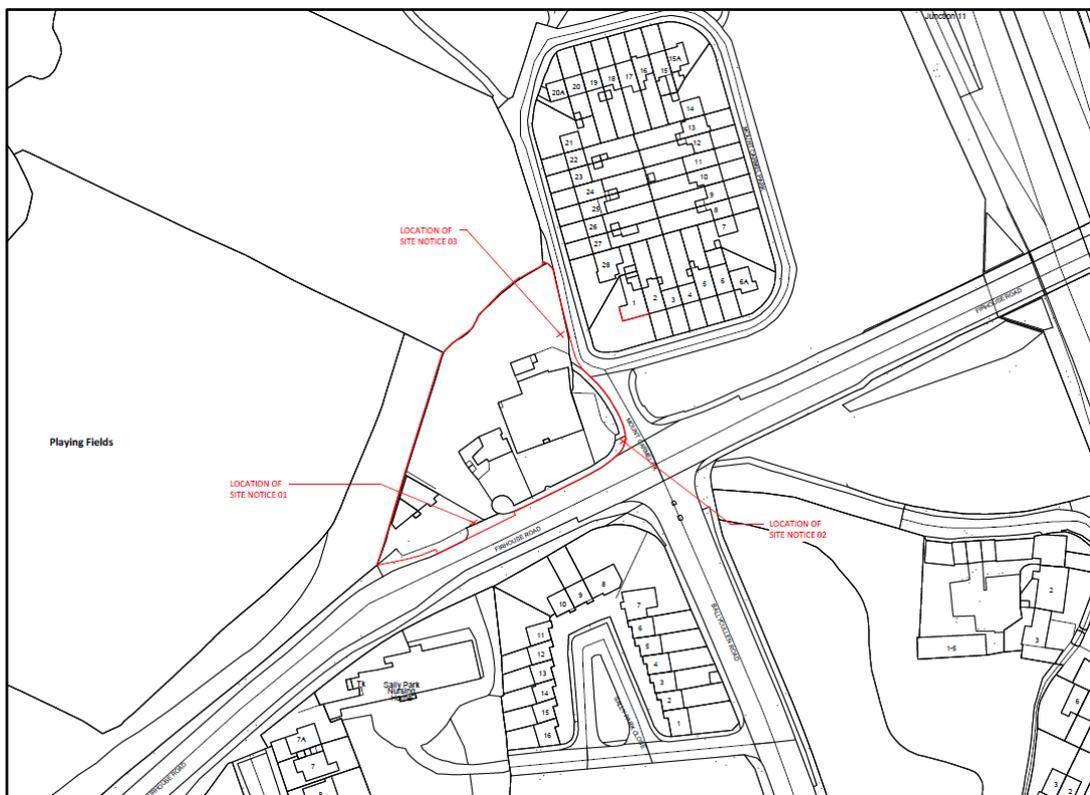


Figure 1.1: Extract from the Site Location Plan, prepared by OMP Architects



## **1.1 Summary of Proposed Development**

In summary, the proposed development will have a total gross floor area of c. 10,827 sq m and will consist of the following:

- 100 No. residential units;
- 355 sq m of non-residential floorspace;
- c. 1,347 sq m 'public open space', c. 29% of the total site area;
- Demolition of existing structures (c. 1,326 sq m); and
- Ancillary development, including 80 No. car parking spaces.

## **1.2 Overview of Changes Since the Pre-App Submission**

Since the pre-application stage, the SHD scheme have been revised to address a number of issues identified by the pre-application consultation process, design team and Applicant.

A summary of the main changes to the SHD scheme is provided below:

- Decrease in the number of residential units from 103 No. to 100 No. units;
- A greater mix of non-residential uses is proposed;
- Amendments to the building height which results in a 3 to 5 storey building over lower ground floor and basement levels;
- Increase in size of public open space and subsequent relocation of the car parking to basement levels;
- 'Own door' duplex units are now located fronting Mount Carmel Park;
- Alterations to the design and material finishes; and
- General design changes to the built form and landscape to enhance design quality of scheme and relationship with context.

### 1.2.1 The Pre-Application SHD Scheme Vs. Final SHD Scheme

Development Statistic	Pre-Application SHD Scheme	Final SHD Scheme (current scheme)
Site Area	0.46 ha	0.46 ha
No. of Residential Units	103 No. units	100 No. units
Non-Residential Floorspace	336 sq m	354 sq m
Gross Residential Density	224 units p/h	217 units p/h
Plot Ratio	1.6	1.7:1
Site Coverage	42%	44%
Height	4 – 5 storeys (over basement level)	3 – 5 storeys (over lower ground floor and basement levels)
Car Parking	77 No. spaces (72 No. at basement level and 5 No. at surface level)	80 No. spaces (63 No. residential and 17 No. crèche, retail and other)
Bicycle Parking	196 (152 No. long stay and 44 No. short stay)	270 No. spaces (226 No. long stay and 44 No. short stay)

Table 1.1: Comparison between Pre-Application Scheme and Final SHD Scheme



Figure 1.0: Photomontage of the proposed development as viewed from the corner of Firhouse Road and Mount Carmel Park, prepared by Digital Dimensions.



### 1.3 Project Team

This submission was prepared on behalf of the Bluemont Developments (Firhouse) Limited by the following expert team:

Discipline	Consultant
<b>Project Lead/Lead Architect</b>	O'Mahony Pike Architects (OMP Architects)
<b>Town Planning Consultant</b>	Tom Phillips + Associates (TPA)
<b>Project Engineer</b>	PHM Consulting
<b>Traffic and Transport Consultant</b>	Transport Insights
<b>Landscape Architect</b>	Studio Aula
<b>Arborist</b>	Charles McCorkell Arboricultural Consultancy (CM Arb)
<b>Ecologist</b>	Flynn Furney Environmental Consultants
<b>Multidisciplinary Consulting Engineers</b>	O' Connor Sutton Cronin Consulting Engineers (OCSC Consulting Engineers)
<b>Visual Impact Assessment</b>	Doyle & O'Troithigh Landscape Architecture
<b>Architectural Visualisation Specialists (photomontages)</b>	Digital Dimensions
<b>Noise Consultant</b>	Allegro Acoustics
<b>Environmental Advisors</b>	AWN Consulting
<b>Archaeologist</b>	Archaeology and Heritage Consultancy Ltd. (AHC)
<b>Conservation Architect</b>	Mesh Conservation Architects
<b>Property Consultants</b>	Hooke & MacDonald

Table 1.2: Key Consultants of Project Team

### 1.4 Purpose of this Report

This *Planning Report* should be read in conjunction with the *Statement of Consistency*, prepared by Tom Phillips and Associates, which outlines the overall compliance of the proposed development with national, regional, and local planning policy. This Report sets out an overview of the proposed development, the site context from a locational, planning, and environmental context and any relevant planning history. The enclosed *Response to ABP Opinion*, prepared by Tom Phillips and Associates, also provides a detailed reasoning for any changes made to the scheme in respect to both An Bord Pleanála and the Local Authority's concerns/comments.

For full details on the design and the design quality of the proposed development, refer to the enclosed *Architectural Design Statement*, prepared by OMP Architects, and the *Landscape Design Rationale Report*, prepared by Studio Aula. The design quality and standard of accommodation proposed by the residential component of the scheme are detailed in the *Housing Quality Assessment (HQA)*, prepared by OMP Architects.



## 1.5 Structure of Planning Documentation – Addressing the Draft *South Dublin County Development Plan 2022-2028*

The nature and extent of the planning documentation and assessment provided in respect of the proposed development recognises that it is a period of transition for planning policy in South Dublin County.

In this regard, we note that the *Draft South Dublin County Development Plan 2022-2028* ('*Draft Plan*') went on public display on 7th July 2021. The public consultation on the proposed amendments to *Draft Plan* ended on the 26<sup>th</sup> April 2022.

The County Development Plan 2022-2028 is expected to be adopted 6 weeks after July 21<sup>st</sup>, 2022 (c. mid-August 2022).

We note that while the *South Dublin County Council Development Plan 2016-2022* ('*Development Plan*') remains in legal effect at the point of the lodgement, we expect that the new County Development Plan 2022-2028 will be in legal effect at the time that the decision is made by An Bord Pleanála.

To this end, we confirm that a supplementary version of both the *Statement of Consistency* and *Material Contravention Statement*, which address the compliance of the proposed development with the *Draft Plan*, also accompany this planning application submission. In our view, this provides An Bord Pleanála with all the information required to determine the planning applicant against whichever is the relevant Plan at that time.

We note that the final wording of the new County Development Plan is not in the public domain at the time of writing, however, this submission provides as much information and assessment as possible in this regard.



## 2.0 SITE AND PLANNING CONTEXT

### 2.1 Site Location and Description of Proposed Development

The subject site is located to the northwest of the Firhouse Road and Ballycullen Road Junction, on a main arterial route connecting Rathfarnham / Templeogue & Ballyboden areas with Firhouse and Knocklyon in Firhouse, Co. Dublin. The M50 is located c.150-200 metres east of the site and accessed via the M50 / N81 Interchange.

The subject site is currently developed with the former 'Morton's, Firhouse Inn' public house and adjoining off-licence (an old two storey buildings constructed with solid stone masonry walls with timber floors and a slate over timber structure roof), a betting office/barber shop (a newer two storey building constructed of concrete masonry walls and concrete floors with slate roof over timber structure) and a cottage (constructed of brick and rubble stone masonry and covered with a dashed render) and a number of associated dilapidated structures, all of which are surrounded by extensive tarmacadam surface car parking.

There is no vegetation present on site and the gradient of the land falls south to north from a level of 73.5m AOD to 71.30m OD. The site has extensive frontage to Firhouse Road to the south and Mount Carmel Park (local access road) to the east. Primary access to the site is currently via Firhouse Road, while secondary access is via a local access road to Mount Carmel Park.

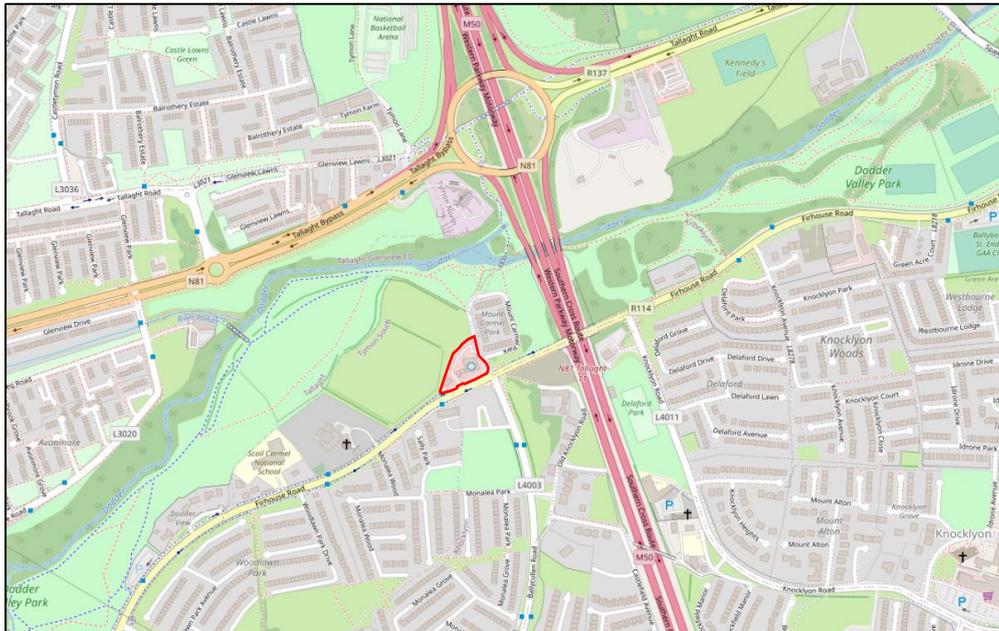
In terms of public transport, the site is located directly adjacent to Dublin Bus route No. 75 (Tallaght – Dun Laoghaire). Dublin Bus routes Nos. 49, 65b, 54a and 77a are also within c. 10 minutes walking distance of the subject site. Additionally, there will be substantial positive changes to the bus network in this area with the development of a core bus network by the National Transport Authority within the *BusConnects* programme. The revised proposed bus network plan includes substantial changes in the bus network in the application site's vicinity. Further details are available under Section 2.3 of the *Traffic and Transport Assessment (TTA)* prepared by Transport Insights.

The townland boundary of Knocklyon and Tymony South runs along the north/northwestern site boundary and takes the form of a rubble and cement wall. The adjoining lands to the north/northwestern are owned by a sports club (Ballyboden St. Enda's GAA). It is worth noting that a *Decision To Grant Permission* was issued by SDCC on the 20<sup>th</sup> July 2021 for the development of these land with sport playing pitches and ancillary club facilities (Reg. Ref: SD20A/0140). Further southwest of these lands lies Carmel of the Assumption Convent.

The River Dodder and Dodder Valley Park, includes mature hedgerows and tree clusters, is located further north of the subject site and is zoned 'HA – High Amenity' under the *South Dublin County Council Development Plan 2016-2022* and 'High Amenity – Dodder Valley' under the *Draft Plan*. It is a key component of the urban landscape in South Dublin and is enjoyed as an amenity space for many locals.



The surrounding area primarily comprises established residential housing estates (predominantly semi-detached) and public/private open spaces with some local shops and services also in the vicinity. Nearby facilities include the Firhouse Shopping Centre (anchored by SuperValu), located approximately c. 900 metres to the west and the Knocklyon Shopping centre, which is a similar distance to the southeast.



**Figure 2.1** The subject lands (outlined in red) in the context of the wider area. (Source: [gis.epa.ie/EPAMaps/](https://gis.epa.ie/EPAMaps/), cropped and annotated by TPA, 2022.)



**Figure 2.2:** Aerial view of the subject lands (outlined in red). (Source: Google Maps, annotated by TPA, 2022.)



The prevailing building height in the surrounding area ranges from 2-3 storeys. No residential developments directly adjoin the site, however, dwellings within Mount Carmel Park to the east are within c. 20 metres of the eastern boundary.

There are a number of Protected Structures within the vicinity, the nearest being ‘House & Gateway’ Sallypark, Ballycullen Rd (RPS Ref. 285), located southwest of the site. Other Protected Structures in the area include Carmelite Monastery of the Assumption (RPS Ref. 284) and The City Watercourse, Firhouse (RPS Ref. 246). The subject site is also located within the Zone of Archaeological Potential associated with Sally Park House (DU022-103----) as recorded on the Record of Monuments and Places.

## 2.2 Pre-Application Consultation

### 2.2.1 Consultation with An Bord Pleanála

Following submission of the Section 5 Pre-Application Consultation to the Board, a tripartite meeting was held on the 24<sup>th</sup> January 2022 which was attended by representatives from the Applicant team, South Dublin County Council (‘SDCC’) and An Bord Pleanála. An Bord Pleanála subsequently issued their Notice of Pre-Application Consultation Opinion on the 22<sup>nd</sup> February 2022.

The discussions and following Opinion from the Board (which is addressed in detail in the *Response to An Bord Pleanála’s Opinion*, prepared by Tom Phillips + Associates) resulted in a number of changes to the scheme, including a revised development strategy. Refer to the enclosed *Response to An Bord Pleanála’s Opinion* for full details.

### 2.2.2 South Dublin County Council

A number of pre-application meetings took place with SDCC over the course of several months as a result of amendments to the site area (see table below). As such, the proposed development has been subject to a number of design iterations which, in our opinion improved the scheme substantially.

Meeting Date	Site Size	Summary of the proposed SHD development	Density
13 <sup>th</sup> January 2021 (SDCC Ref. SHD1SPP016-20)	c. 0.28 ha	100 No. apartment units 1 No. ‘non-residential’ unit in 3 blocks ranging in height from 3 to 7 storeys over basement level	320 uph
9 <sup>th</sup> April 2021 (SDCC Ref. SHD1SPP016-21)	c. 0.39 ha	100 No. apartment units, 1 No. ‘non-residential’ unit in 3 blocks ranging in height from 3 to 5 storeys over basement level	256 uph
29 <sup>th</sup> July 2021 (SDCC Ref. SHD1SPP010-21)	c. 0.46 ha	103 No. apartment units, commercial unit, café and crèche in 3 blocks ranging in height from 3 to 5 storeys over basement level	224 uph

Table 2.1: Details of pre-application consultant meetings with SDCC (collated by TPA, 2022.)



Throughout the pre-application process with SDCC, discussions were undertaken with the following Council departments:

- Planning
- Roads
- Water and Drainage
- Parks

SDCC were copied to the Applicant's *Section 5 Pre-Application Consultation Request* which comprised full details of the pre-application scheme. In line with the SHD process, SDCC issued their Chief Executive's report which, pursuant to Section 6(4)(b) of the relevant SHD legislation, provided their opinion in respect of the SHD pre-application scheme. A full response to the points raised within the Chief Executive's report is located in Appendix B of the *Response to An Bord Pleanála's Opinion*, prepared by Tom Phillips + Associates.

We note that further engagement took place with SDCC's Water and Drainage Department and the Parks Department after the tripartite meeting took place, details of which can be found within the enclosed assessments.

### **2.2.3 Consultation with Irish Water**

As part of the development design process, a pre-connection enquiry was submitted to Irish Water on the basis of a Strategic Housing Development (SHD) of 120 No. units. A Confirmation of Feasibility (CoF) as issued by Irish Water on the 28<sup>th</sup> January 2021, along with a Statement of Design Acceptance (SoDA) issued on the 13<sup>th</sup> May 2022 (Both form part of Appendix G of the enclosed *Water Services Report*, prepared by PHM Consulting.)

### 3.0 PLANNING HISTORY

#### 3.1 Overview of Planning History

We conducted a planning history search of the site using South Dublin County Council’s online planning history search facility and that of An Bord Pleanála, in order to establish the planning history of the subject site and of similar sites in the vicinity.

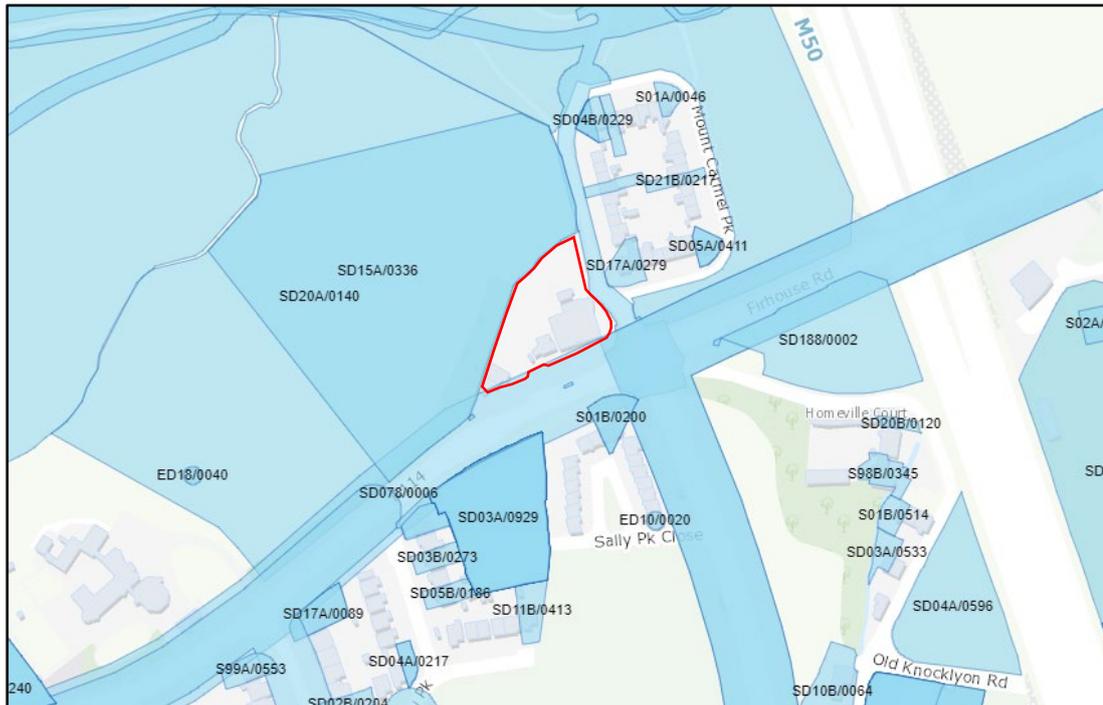


Figure 3.1: Extract from South Dublin County Council Planning Map Search with the subject site outlined in red (source: <https://sdublincoco.maps.arcgis.com>, cropped and annotated by TPA, 2022.)

We note that there are no previous planning applications within the application site. However, there are some applications for small scale development (i.e., residential extensions, changes of use, retention, and other minor alterations etc.) which are located in close proximity to the subject site. We have reviewed these applications (as set out in the table below) but have not elaborated given their scale and nature.



<b>SDCC/ABP Reg. Ref.</b>	<b>Address</b>	<b>Overview of Development</b>
SD21B/0217	Ground & first floor extension at rear to replace single storey structure plus attic conversion into non-habitable space along with porch extension to front	10, Mount Carmel Park, Dublin 24
SD20A/0140	Lands adjacent to Carmel of the Assumption Convent, Firhouse Road, Firhouse, Dublin 24	Construction of 2 grass playing pitches
SD19B/0164	19, Mount Carmel Park, Firhouse, Dublin 24	Construction of a double storey extension to the rear; internal alterations; vehicular entrance
SD17A/0279	1, Mount Carmel Park, Knocklyon, Dublin 24, D24 E9T4	Demolition of existing garage and construction of semi-detached two-storey, three-bedroom dwelling house with new vehicular entrance and associated landscaping, boundary and site development works
SD188/0002	Old Knocklyon Road, Firhouse, Dublin 16	Rapid Build Social Housing Development consisting of 16 housing units on undeveloped lands on site comprising 2 No. 3 bedroom/5 person units - 2 storey; 5 No. 3 bedroom/5 person units - 2 storey; 9 No. 2 bedroom/3 person units - 3 storey Apartment Unit. New access off Old Knocklyon Road, landscaping works to boundaries and new park/play area, ancillary works to landscape housing areas, and all necessary associated ancillary works on the site and adjacent areas.

**Table 3.1: Summary of planning history in the surrounding area (collated by TPA, 2022.)**



## 4.0 THE PROPOSED STRATEGIC HOUSING DEVELOPMENT

### 4.1 Description of Development (as per Statutory Notices)

*'Bluemont Developments (Firhouse) Limited intend to apply to An Bord Pleanála (the Board) for a Strategic Housing Development with a total site area of c.0.46 ha, on lands located at No. 2 Firhouse Road and the former 'Morton's The Firhouse Inn', Firhouse Road, Dublin 24.*

*The development will consist of the demolition of all existing structures on site (c. 1,326 sq m), including:*

- *Two storey building formally used as public house, ancillary off-licence and associated structures (c. 972 sq m);*
- *Two storey building comprising an existing barber shop and betting office (c. 260 sq m);*
- *Single storey cottage building and associated structures (c. 94 sq m); and*
- *Eastern boundary wall and gated entrance from Mount Carmel Park.*

*The development with a total gross floor area of c. 11,638 sq m, will also consist of 100 No. residential units arranged in 2 blocks (Blocks 01 and 02) ranging between 3 and 5 storeys in height, over lower ground floor and basement levels, comprising:*

- *96 No. apartments (consisting of 2 No. studio units; 45 No. one bedroom units; 10 No. two bedroom (3 person) units; 34 No. two bedroom (4 person) units; and 5 No. three bedroom units), together with private (balconies and private terraces) and communal amenity open space provision at podium and roof levels; and*
- *4 No. duplex apartments (consisting of 2 No. one bedroom units and 2 No. two bedroom units (4 person) located within Block B01, together with private balconies and terraces.*

*The development will also consist of non-residential uses (c. 355 sq m), including:*

- *1 No. café (c. 58 sq m) and 1 No. office (c. 30 sq m) located at ground floor level of Block B01;*
- *1 No. medical unit (c. 59 sq m) and 1 No. betting office (c. 66 sq m) located at ground floor level of Block B02;*
- *1 no barber shop (c. 28 sq m) located at ground floor level between Blocks 01 and 02; and*
- *1 No. crèche (c. 114 sq m) located at lower ground floor level of Block B01 and associated outdoor play area to the rear.*

*Vehicular access to the site will be from the existing access off Firhouse Road. The proposal includes minor alterations to the existing access, including the provision of new and enhanced pedestrian infrastructure.*



*The development will also consist of the provision of public open space and related play areas; hard and soft landscaping including internal roads, cycle and pedestrian routes, pathways and boundary treatments, street furniture, basement car parking (80 No. spaces in total, including accessible spaces); motorcycle parking; electric vehicle charging points; bicycle parking (long and short stay spaces including stands); ESB substations, piped infrastructural services and connections to existing public services, (including relocation of existing surface water sewer and water main from within the application site onto the public roads area along Firhouse Road and Mount Carmel Park); ducting; plant; waste management provision; SuDS measures; stormwater management and attenuation; sustainability measures; signage; changes in levels; public lighting; and all ancillary site development and excavation works above and below ground.'*

## 4.2 Development Statistics

Development Statistic	Proposed Development
Site Area	0.46 ha
No. of Residential Units	100 (96 No. apartments, including 4 No. duplex units)
Non-Residential Floorspace	355 sq m
Gross Residential Density	217 No. units per hectare
Plot Ratio	1.5:1
Site Coverage	44%
Height	3 – 5 storeys (over lower ground floor and basement levels)
Car Parking	80 No. spaces (60 No. residential spaces (0.63 spaces per unit) and 15 No. non-residential), including 17 no. EV charging spaces.  8 No. Motorcycle Spaces (5 No. residential spaces and 3 No. commercial spaces).
Bicycle Parking	270 No. spaces (226 No. long stay and 44 No. short stay)

**Table 4.1: Development Statistics for the Proposed SHD**



### 4.3 Overview of Proposed Development

#### 100 NO. RESIDENTIAL UNITS

The proposed development will deliver 100 No. residential units arranged in 2 No. blocks (Blocks 01 and 02) ranging between 3 and 5 storeys in height.

The proposed scheme wide housing mix is as follows:

Unit Type	Apartments	Total
Studio	2	(2%)
1 bed	45	(45%)
2 bed (3 person)	10	(10%)
2 bed (4 person)	34	(34%)
3 bed	5	(5%)
Duplex (1 bed)	2	(2%)
Duplex (2 bed – 4 person)	2	(2%)
	<b>100</b>	<b>100%</b>

Table 4.2: Proposed scheme wide unit mix.

#### **Block 01**

Block 01 is located within the eastern part of the site, adjacent to Mount Carmel Park and consists of a new apartment block with the central podium space to the east. The podium space comprises a landscaped communal courtyard with parking below at the basement level. The height of Block 01 ranges between 3 and 5 storeys in height over lower ground floor and basement levels. The building has a gross floor area of 2,916 sq m and comprises 48 No. residential units, including:

- 44 No. apartments (2 No. studio units, 18 No. 1 bed units, 6 No. 2 bed (3p) units and 18 No. 2 bed (4 p) units);
- 4 No. duplex apartments (2 No. 1 bed units and 2 No. 2 bed (4 person) units); and
- Barber shop (c. 28 sq m), café (c. 58 sq m), crèche (c. 114 sq m) and an office (c. 30 sq m).

Full details on Block 01 can be found in the enclosed architectural plans and accompanying *Architectural Design Statement*, prepared by OMP Architects, which are enclosed as part of this planning application.

## Block 02

Block 02 is located within the western part of the site, adjacent to lands used for recreational purposes and consists of a new apartment block with the central podium space to the west. The podium space comprises a landscaped communal courtyard with parking below at the basement level. The height of Block 02 ranges between 4 and 5 storeys in height over lower ground floor and basement.

The building has a gross floor area of 3,938 sq m and comprises 52 No. residential units, including:

- 52 No. apartments (27 No. 1 bed units, 4 No. 2 bed (3p) units, 16 No. 2 bed (4 p) units and 5 No. 3 bed units;
- Betting office (c. 66 sq m) and medical practitioners (c. 59 sq m).

Full details on Block 02 can be found in the enclosed architectural plans and accompanying *Architectural Design Statement*, prepared by OMP Architects, which are enclosed as part of this planning application.



Figure 4.1: Extract from OMP Architect's *Architectural Design Statement* showing the proposed SHD site layout

### c. 355 SQ M OF NON-RESIDENTIAL FLOORSPACE

The proposed development will deliver a varied non-residential provision which will be integrated into the proposed residential blocks (primarily at ground floor level) fronting Firhouse Road to the south and Mount Carmel Park to the east.

The proposed non-residential uses include a 1 no café unit (c. 58 sq m), 1 No. barber shop (c. 28 sq m), 1 No. betting office (c. 66 sq m), 1 No. office unit (c. 30 sq m), 1 No. medical unit (c. 59 sq m) and a new crèche (c. 114 sq m) and associated outdoor play area.

The proposed non-residential uses will serve both the residents of the proposed development and the existing community.



Figure 4.2: Extracts from the proposed Ground Floor Plan (Level 00) and Lower ground Floor Level (Level B1) plans, prepared by OMP Architects showing the proposed non-residential uses.

## PUBLIC OPEN SPACE (c. 1,347 sq m)

The proposed development provides a significant quantum of high-quality open space which will be accessible to the public. The proposed public open space provision equates to c. 29% of the total SHD site area. The space has been designed inclusively to serve the existing community as well as the residents of the proposed residential development. The planting proposals represent a significant increase in greening of the space from the existing site appearance and from the previously submitted pre-application scheme layout.

Public open space has been provided in the developed scheme design in a mainly south-oriented area fronting onto Firhouse Road and Mount Carmel Park and comprises a 2m wide path along the road frontages of the two streets; planted landscape buffers; improved biodiversity; amenity tree, shrub, ornamental grass, bulb, and perennial planting; a 3m wide path to the front of the development (southern elevation); natural SuDS stormwater attenuation; and 'play-along-the-way' provisions for all ages and abilities. The existing area is currently laid out as an asphalt-surfaced car park and the design proposals envisage turning it into a heavily planted space with improved legibility and universal access for the public.



Figure 4.3: Extract showing the public open space (green) proposed (source: OMP Architects.)

## CREATION OF CYCLIST AND PEDESTRIAN LINKS

In order to integrate the proposed development into the surrounding area, ensure permeability and improved connectivity between the application site and surrounding streets and achieve a positive interface with the surrounding public realm, the proposed development includes a 2m wide path along the road frontages of the Firhouse Road and Mount Carmel Park road and a 3m wide path which dissects the site to the front of the commercial units. These routes will help people navigate past and through the site via a linger



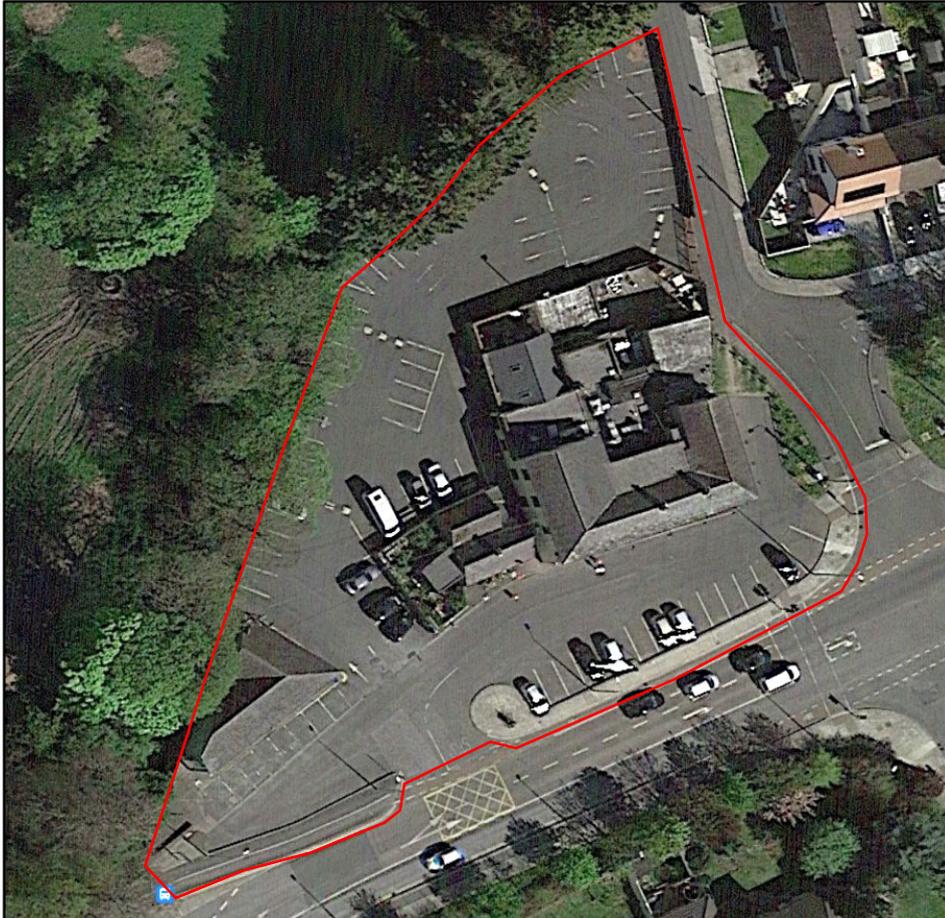


Figure 4.5: Google Earth image showing the existing conditions of the subject site which is currently defined by extensive areas of hard standing and lacks permeability and is wholly underutilized.

### **DEMOLITION OF EXISTING STRUCTURES (c. 1,326 SQ M)**

The proposed development will include the demolition of a number of existing buildings and structures across the site with a total floor area of c. 1,326 sq m. This includes the former 'Morton's The Firhouse Inn' public house and off-licence, the existing building containing the barber shop and betting office, the vacant cottage, the eastern boundary wall and gateway and ancillary structures.



Figure 4.6: Extract from OMP Architects Dwg. No. 20022-OMP-00-SX-DR-A-1002 showing the proposed demolition plan.

#### 4.4 Taking in Charge

A Taking in Charge Plan (Dwg. No. 20022-OMP-00-SP-DR-A-1001) is enclosed with this planning application submission. It is proposed that the pathway along Firhouse Road and Mount Carmel Park are taken in charge by South Dublin County Council (SDCC). It is therefore envisaged that SDCC will manage these spaces in line with Council procedures and protocols, subject to agreement.

#### 4.5 Public Open Space

As set out above, although this area of land is owned by SDCC, the upkeep of the public open space will fall under the same management regime as the residential units, which will be managed by a management company, and may be subject to service charges etc. This planning application is therefore accompanied by a *Responsible for Open Space Areas* report and a *5 year Landscape Management Schedule*, prepared by the Applicant, which provides full details in respect to maintenance costs, access and liabilities of the public open space.

Regarding the public open space provided and enhancements to the public realm, we further note the new positive interface between the subject lands and Firhouse Road/Mount Carmel Park at this location which will replace hardstanding surface car parking which is unwelcoming. The enhanced permeability in this location will also provide for an increased movement and fluidity of pedestrians and cyclists through to Dodder Valley Park, providing greater opportunities for a range of users and activities.



Although subject to agreement with the Local Authority, the taking in charge of the footpaths along the perimeter of the subject site will ensure seamless integration of the proposed development into its surrounds.

#### 4.6 Car Parking

Car parking management is detailed in the *Traffic and Transportation Assessment (TTA)*, prepared by Transport Insights. The *Development Plan* car parking standards and the breakdown of the car parking spaces provided as part of the proposed development is shown below (as extracted from the enclosed TTA).

Category	Land Use/Dwelling Type	Zone 2 Rate	No. Apartments/ GFA/ Classrooms / Consulting Rooms	Max. Car Parking Spaces	Proposed Car Parking Spaces
Residential	1-bed Apartment	0.75 spaces	49	37	63
	2-bed Apartment	1 space	46	46	
	3-bed Apartment	1.25 spaces	5	6	
Education	Creche	0.5 per classroom	1	1	5 (incl. drop-off spaces)
Retail and Retail Service	Café	1 per 20 sqm GFA	58	3	3
Retail and Retail Service	Bookmaker*	1 per 25 sqm GFA	66	3	3
Retail and Retail Service	Barber's*	1 per 25 sqm GFA	28	2	2
Medical	GP / Dental Practice	1.5 per consulting room	3	3	3
Enterprise and Employment	Office	1 per 75 sqm GFA	30	1	1
<b>Total</b>				<b>102</b>	<b>80</b>

Figure 4.7: Extract from the Traffic and Transport Assessment, prepared by Transport Insights showing the breakdown of the car parking proposed



Most importantly from a management perspective, we note that the residential car parking spaces will be allocated in line with the management regime for the development. As part of this, parking spaces will be allocated at the contract stage in line with the car parking allocation ratios set out in the TTA.

The implementation of the *Framework Residential Travel Plan*, prepared by Transport Insights, is also a key element of transport management at the site which encourages more sustainable forms of transport over the private car.

#### 4.7 Bicycle Parking

Bicycle parking management is detailed in the *Traffic and Transportation Assessment (TTA)*, prepared by Transport Insights. The *Development Plan* car parking standards and the breakdown of the bicycle parking spaces proposed is shown below (as extracted from the enclosed TTA,).

Land Use	Required				Proposed	
	Long-Term		Short-Stay		No. Long-Term Proposed	No. Short-Stay Proposed
	Standard	No.	Standard	No.		
Residential Apartment	1 per 5 apartments	20	1 per 10 apartments	10	156	50
Creche	1 per 5 staff	1	1 per 10 children	2	5	16
Café	1 per 5 staff	1	1 per 10 seats	2	3	6
Bookmaker *	1 per 5 staff	1	1 per 50 sqm GFA	2	3	6
Barber's*	1 per 5 staff	1	1 per 50 sqm GFA	1	3	6
GP / Dental Practice	1 per 5 staff	1	0.5 per consulting room	2	3	6
Office	1 per 200 Sqm GFA	1	1 per 200 Sqm GFA	1	3	4
Sub-total	-	26	-	20	176	94
<b>Total</b>		46		270		

Figure 4.8: Extract from the Traffic and Transport Assessment, prepared by Transport Insights showing the breakdown of the bicycle parking proposed.



## 5.0 KEY PLANNING ISSUES FOR THE LANDS

This section refers to key planning issues pertaining to the lands at application site and should be read in conjunction with the following reports, also prepared by Tom Phillips + Associates:

- *Statement of Consistency*
- *Response to ABP Opinion*
- *Material Contravention Statement*

For the avoidance of doubt, this *Planning Report* is not intended to provide a further full assessment of the scheme. Instead, it provides supplementary commentary surrounding what we would consider to be the key issues for the redevelopment of the lands. The below assessment is therefore not to be taken as an exhaustive review of the scheme.

### 5.1 Policy Context

As noted previously, the *Statement of Consistency*, prepared by Tom Phillips + Associates, provides a full commentary on all relevant planning policy and demonstrates the general policy compliant nature of the proposed development. For full details on compliance with the relevant national, regional, and local planning policy and guidance documents, refer to the *Statement of Consistency*.

As set out in Section 1.6 of this Report, whilst the *South Dublin County Council Development Plan 2016-2022* is the current Development Plan at the time of writing, the planning documentation submitted also covers the eventuality that the new (currently draft) *Draft South Dublin County Development Plan 2022-2028* is in legal effect at the time that An Bord Pleanála determine this planning application. To this end, we confirm that a supplementary version of both the *Statement of Consistency* and *Material Contravention Statement*, which address the compliance of the proposed development with the *Draft Plan*, also accompanies this planning application submission.

### 5.2 Principle of Development

The proposed development which comprises a residential development with some non-residential supporting facilities is acceptable in principle, having regard to the policy designations pertaining to the lands.

The subject lands benefit from a mixed use land zoning under the provisions of the *South Dublin County Council Development Plan 2016-2022* (as varied) - the specific zoning 'LC - Local Centres' is '*to protect, improve and provide for the future development of Local Centres*'. As well as residential development being 'permitted in principle', we confirm that the proposed non-residential uses are also 'permitted in principle' under this zoning objective.



The mixed use zoning of the lands is maintained under the *Draft Plan*. On this basis, we confirm that the proposed development is also supported in principle by the *Draft Plan*.

### 5.3 Residential Density

The proposed SHD development has a gross residential density of 217 No. units per hectare, based on 100 No. units and a site area of 0.46 ha approximately.

We note that the above densities have been calculated in accordance with Appendix A of the *Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities* (2009) which states that a “*gross density measure is best applied to estimating overall land areas required for mixed use developments or for Local Area Plans*”.

Referring to the policy objectives surrounding residential density, we reiterate that the *Development Plan* states that it is Council policy to promote higher residential densities at appropriate locations and to ensure that the density of new residential development is appropriate to its location and surrounding context. The *Draft Plan* supports higher residential densities at appropriate locations that are close to Town, District and Local Centres and high-capacity public transport corridors.

From a design perspective, we consider that the site-specific assessments that support this planning application demonstrate the appropriateness and acceptability of the residential density proposed. In this regard, despite the higher density proposed, the proposed development is considered to deliver a high-quality development. These considerations are summarised below:

- The standard of residential accommodation proposed is of a high quality with excellent adherence to the BRE Guidelines from a daylight and sunlight perspective.
- The concentration of development in parts of the site is achieved without giving rise to unacceptable impact upon neighbouring residential amenity. For example, in this regard, the *Daylight & Sunlight Report*, prepared by OCSC Consulting Engineers, demonstrates that the 25° line and the Vertical Sky Component analysis have shown that a negligible impact will be perceived by any of the surrounding properties.
- The *Visual Impact Assessment* (VIA), prepared by Doyle + O’Troithigh Landscape Architecture Ltd, appraises the visual impacts arising from the proposed development and concludes that the proposed scheme includes a series of measures that will ensure a long term positive impact in areas, in particular, to the Firhouse Road R114.



#### 5.4 Design Strategy

The proposed development has been subject to an iterative design process due to the expansion of the site from early design stages. As a result, the proposed design strategy responds to a multitude of site-specific characteristics and opportunities and ensures an optimal design solution for these strategically important lands.

The design strategy seeks to maximise the delivery of residential (and supporting non-residential) development while responding to the specific policy requirements associated with urban centres.

In our view, the proposed scheme strikes an appropriate balance between the delivery of housing and compact growth, as required by national and regional policy, and a sensitive response to the existing built character of the area which lies proximate to the Dodder Valley Park and Protected Structures.

The detailed design rationale is set out in the enclosed *Architectural Design Statement*, prepared by OMP Architects.

#### 5.5 Building Height

The proposed development ranges between 3 and 5 storeys in height (above finished floor level) and has been designed to sensitively respond to the surrounding neighbouring development, the protected views looking from the N81 and the location of the site adjacent to 'High Amenity – HA' lands.

The lower building heights are located towards the northeast edge of the site, contributing to a sensitive transition between the adjacent existing development, which is predominantly two storey in height, and the proposed 5 storey buildings.

We note that a number of changes have occurred in respect of the overall scheme design, including the building height strategy, since the pre-application stage. This was influenced by a number of factors including the interface along Firhouse Road and Mount Carmel Park and the proposed built form, the sunlight performance of some of the courtyard and roof level amenity spaces, and the relationship between some elements of the proposed blocks and neighbouring development.

As demonstrated in the *Statement of Consistency*, the proposed development, with a maximum height of 5 storeys, complies in full with SPPR3 of the Building Height guidelines (albeit addressed in *Material Contravention Statement* due to the proximity of the proposed 6 storey development within 35m of adjacent two storeys residencies as contained within Section 11.2.7 of the *Development Plan*).



Furthermore, from a visual impact perspective, the enclosed *Visual Impact Assessment (VIA)* concludes that the proposed scheme includes a series of measures that will ensure a long term positive impact in areas, in particular, to the Firhouse Road R114. The proposed development will also be largely screened by the existing mature vegetation adjacent to the site to the north and west.

In conclusion, the proposed building height strategy is considered to reflect a balance between the delivery of housing provision and complying with the 'local centre' zoning of the lands and the associated policy requirements.

## 5.6 Relationship with Neighbouring Developments

In their current use, the subject lands comprise a number of small buildings which are occupied by local services, which have been retained in the final scheme for the proposed development. The northern perimeter is bounded by a rubble stone wall which separates the site from adjoining recreational lands and the Dodder Valley Park. The nature of the perimeter wall, the lack of density built form within the site, and the extensive car parking are considered to result in very little impact, from a residential amenity perspective, upon adjacent neighbouring development. The proposed development will result in a modern, desirable, high-density residential development which has been designed to be sensitive to nearby residencies.

It is acknowledged however that the proposed development will give rise to a change in the way that neighbouring development experiences the subject lands. In terms of potential impact arising, we have given careful consideration to the impact of the development upon neighbouring amenities and every effort has been made by the Design Team to minimise the potential for such impacts throughout the SHD design process.

### ***Overshadowing***

The overshadowing impact of the proposed development on surrounding buildings has been analysed by OCSC Consulting Engineers. The overshadowing images contained within Section 10 of the enclosed *Daylight & Sunlight Report* illustrate any potential overshadowing impacts on adjacent residential developments caused by the proposed development on March 21<sup>st</sup>, June 21<sup>st</sup> and December 21<sup>st</sup> at hourly intervals. In summary, it was found that there will be minimal impacts on neighbouring dwellings with the exception of 4 p.m. in March and 2 p.m. onwards in December. Overall, it is clear from the imagery that any shadowing on neighbouring properties will be generally brief and insignificant.

### ***Overbearing***

Since the pre-application stage, the proposed height strategy has been amended which is considered to reduce any perceived potential overbearing impacts associated with the proposed development.



Notwithstanding this, we note that a sense or experience of ‘overbearingness’ is subjective and therefore difficult to quantify for assessment purposes. Nevertheless, in our view, the proposed separation distances and height strategy mitigate concerns in this regard. This is further evidenced by the positive daylight, sunlight and overshadowing assessment in respect of the impact of the proposed development upon surrounding neighbouring development. The conclusions of the VIA are also considered to support this.

In our view, the proposed height strategy, which tapers towards the northeast site boundary will ensure that neighbouring two-storey properties are not immediately adjacent to taller buildings. The siting of increased height towards the less sensitive locations of the site is considered to provide a sense of visual relief for neighbouring development.

### ***Overlooking***

A number of amendments have been made to minimise the amount of potential overlooking arising from the proposed development, including alterations to some of the blocks to improve the relationship between the proposed development and neighbouring properties at Mount Carmel Park. A full design study was undertaken by OMP Architects to identify any risks of potential overlooking and compromises on privacy to surrounding dwellings (see Section 6 of the enclosed *Statement of Response*, prepared by OMP Architects). Due to the design changes made and embedded mitigating features such as generous separation distances between the buildings within the scheme and neighbouring development, balcony positioning, steeping of the facades etc., it is not considered that the proposed development will give rise to unacceptable adverse impact in relation to overlooking.

## **5.7 Residential Development**

As set out in relation to the strategic planning context previously, the proposal seeks the redevelopment of lands in the context of housing need and delivery. The proposed development will deliver 100 No. units at a residential density of 217 units per hectare on brownfield, serviced lands which are well-connected to public transport. Therefore, as detailed in the *Statement of Consistency*, the proposed development aligns with national and regional policy objectives and guidelines pertaining to housing delivery, compact growth and sustainable development.

The proposed housing mix is considered to contribute to the delivery of a mixed and balanced community and responds to an existing prevalence of low-density housing in the surrounding area. In alignment with the Apartment Guidelines, the scale and nature of the proposed apartment development is considered appropriate in the context of the site’s locational characteristics from a public transport accessibility perspective. In this regard, the classification of the lands as an ‘Intermediate Urban Location’ throughout this planning application submission is owed to the proximity of the site to employment locations, recreational facilities and a range of bus stops/routes serving key destinations.



Importantly, we highlight that the proposed development will deliver 20% of the units as social and affordable in line with Part V of the *Planning and Development Act 2000* (as amended).

The scale of the proposed development, particularly in relation to height and density, is considered to be appropriate in design terms as well as from a locational perspective. The development is considered to optimise the delivery of housing from a quantum perspective whilst providing a high standard of residential accommodation. This is demonstrated in detail in the *Housing Quality Assessment* (HQA) which confirms full compliance with the Apartment Guidelines and Sustainable Housing etc., the quality of residential accommodation provided is further evidenced by the *Daylight & Sunlight Report* which confirms that 100% of the habitable rooms tested across the development comply with the BRE Guidelines for daylight (ADF).

A number of improvements were also made since the pre-application stage to ensure adequate privacy levels were achieved for both future and existing neighbouring occupiers.

As set out in detail above, the open space provision, given its quality and quantity, is considered to contribute to the overall standard of residential accommodation and therefore play a pivotal role in the delivery of successful placemaking.

## 5.8 Public Open Space Provision (and Landscape Design)

The *Development Plan* specifies that all new residential developments on mixed use zoned lands shall be required to incorporate a minimum of 10% of the total site area as public open space.

The proposed public open space measures c. 1,347 sq m and constitutes c. 29% of the total site area. It fronts onto Firhouse Road and Mount Carmel Park is orientated to the south. It primarily comprises:

- a 2m width path along Firhouse Road and Mount Carmel Park;
- planted landscape buffers;
- improved biodiversity;
- amenity trees, shrubs ornamental grass, bulbs and perennial planting;
- a 3m width path adjacent to the southern elevation of the proposed scheme;
- natural SuDS stormwater attenuation; and
- play-along-the-way provisions for all ages and abilities.

The existing area is currently laid out as an asphalt-surfaced car park and is void of any vegetation. It is proposed to transform this space into a high-quality, universally accessible, public realm with improved legibility. This will be a significant improvement on the existing site conditions and enhance the relationship between the subject site and the surrounding public realm.



The application is accompanied by the proposed Landscape Masterplan and *Landscape Architecture Design Rationale + Statement of Response*, prepared by Studio Aula.

In our opinion, the proposed development provides open space of exceptional quality and provides a strong contribution to the green infrastructure provision in Firhouse and the surrounding area.

The relevant policy requirements and development standards in respect of open space and amenity space provision are addressed in full in the *Statement of Consistency*.

## 5.9 Mobility

The Applicant is committed to delivering a low carbon development with the emphasis on sustainable travel modes and reduced private car dependency in line with the strategic objectives of the National Planning Framework.

The locational characteristics of the subject site, in the context of public transport accessibility, is considered to support the provision of reduced car parking and emphasis on sustainable travel.

In addition to the location of the lands, the nature and characteristics of the proposed development is considered to encourage and support the use of sustainable modes of transport and minimise reliance on car use, including through the provision of non-residential local services and facilities and the internal site layout and proposed pedestrian and cyclist connections.

Full details of the transport proposals and assessment are contained within the *Traffic and Transport Assessment (TTA)*, prepared by Transport Insights.

## 5.10 Reduced Car Parking

The *Statement of Consistency* provides a full assessment of the proposed residential car parking provision against the relevant *Development Plan* (and *Draft Plan*) standards and the Apartment Guidelines. Whilst the reduced quantum of car parking proposed, we confirm that the residential car parking aligns with the provisions for reduced car parking contained within both the *Development Plan* and the Apartment Guidelines.

The proposed development has been designed to minimise reliance on car use and encourage and support the use of sustainable modes of transport.

In summary, the proposed residential car parking ratio is considered to be both appropriate and acceptable for the following reasons:

- The locational characteristics of the site in the context of public transport, employment locations and local services and infrastructure (education retail, leisure etc.);



- When considered against the Apartment Guidelines, the site is considered to be an 'Intermediate Urban Location' and is, therefore, deemed to be an appropriate location for higher density apartment development with reduced car parking;
- The specific characteristics of the proposed development which is mixed use in nature, provide local services and facilities, including public open space and public realm improvements. The number of car parking spaces proposed for the non-residential uses is in accordance with the *Development Plan* standards.
- The provision of cycle and pedestrian connectivity through the site has been designed to promote sustainable travel patterns for both the existing and new communities.
- The measures contained within the Framework Residential Travel Plan will encourage the use of public transport, walking and cycling over the private car.
- The proposed car parking management strategy will ensure the management of car parking/allocation to avoid inappropriate overspill into the surrounding network;

Having regard to the factors set out above, we consider that the characteristics of the application site and proposed development lend themselves to reduced car parking provision. We, therefore, confirm that the proposed parking provision is acceptable in line with the national policy objectives and guidelines relating to sustainable travel modes and reduced dependency on car.

### 5.11 Landscaping

Further to previous commentary surrounding public open space, we provide an overview of the landscape proposals below. We note that the proposal is set out in detail in the *Landscape Architecture Design Rationale + Statement of Response* prepared by Studio Aula. This Report provides a description of each of the key open spaces that form part of the landscape strategy for the development. It is clear that the proposal provides an appropriate hierarchy of open spaces which provide for high quality, varied, inclusive and accessible spaces.

In addition to the delivery of new and varied open spaces, the proposed development connects into the existing green infrastructure in the surrounding area via Dodder Valley Park to the north. This new positive interface between the subject lands and Firhouse Road/Mount Carmel Park is facilitated by the proposed removal of the eastern boundary wall and the provision of a footpath which enhances permeability at this location and provides for an increased movement and fluidity of pedestrians, providing greater opportunities for a range of users and activities. The siting of the proposed non-residential uses facilities at this location further strengthens the function of the local centre as an inclusive and accessible space.

From an ecological perspective, the proposal includes significant planting which has the potential to benefit a wide variety of plant and animal species and will create habitats. In this regard, this application is also supported by an *Invasive Species Survey Report*, prepared by Flynn Furney Environmental Consultants, which ensures sets out biodiversity measures to prevent any potential future invasive species infestation.

The proposed development includes an extensive network of SuDS measures which as well as contributing to stormwater management, provides significant enhancements from a biodiversity perspective. The SuDS strategy is depicted in Figure 5.1 below and comprises the following measures:

- Green/Blue roofs to all flat roof areas.
- Blue roof system to the Basement Podium at ground floor level.
- Infiltration Trenches within the public realm areas to the south and east of the building.
- Tree pits and rain garden areas to the public realm areas.
- Permeable surface paving and subsurface attenuation layer.
- Maximum discharge rate of 1.5 l/s noted on drainage layout at the outfall Hydrobrake manhole



Figure 5.1: Extract from the Surface Water Drainage Layout, prepared by PHM Consulting



Refer to the engineering documents for full details surrounding the SuDS proposals from a drainage and stormwater management perspective.

In terms of play provision, the open space network proposed provides for a broad variety of play and play spaces, both formal and informal. Full details on the play provision proposed as part of this application are contained within the *Landscape Design Rationale + Statement of Response*.

We therefore conclude that the proposed development is of exceptional quality from a landscaping perspective, both in respect of the quantity of open space provided and the quality of the detailed proposals. From an amenity perspective, the landscaping strategy provides significant benefit to future residents and the existing community; it will make a positive contribution to the green infrastructure network as well as providing a new public open space that provide for a range of users and activities. As demonstrated above, the landscaping proposals will also enhance biodiversity through the proposed planting specification and the SuDS measures proposed.

## 5.12 Tree Protection

The application is accompanied by an *Arboricultural Report*, prepared by CM Arb. There are no trees located within the subject site and consequently, no trees are proposed to be removed as part of the proposed development. There is a group of mature trees located adjacent to the north-western boundary of the site, species of which include Leyland Cypress, Ash, Beech, and Sycamore. These trees form part of a larger tree group which are visually prominent and of high public amenity value. They are a significant landscape feature within the local surrounding area.

During the construction phase, the lower overhanging lateral branches of the neighbouring trees are required to be reduced back to the boundary line in order to provide sufficient space and clearance for construction works to be carried out. In certain instances, overhanging lateral branches have been previously reduced back to the boundary and have regrown. The opinion of the Arborist is that, taking the past management works into consideration, along with the minor extent of pruning works that are required to facilitate the proposed development, there will be no adverse impacts on the health or visual appearance of the trees in the adjoining lands.

During the operation phase of the proposed development, pruning works will be required to maintain sufficient clearance between tree canopies and the proposed buildings and balconies. The works can be undertaken to previous pruning points on a periodic basis without having a detrimental impact on the health of the trees concerned. No pruning works are permitted or required to extend beyond the site boundary line.

Excavation works will be required to construct the proposed basement and buildings. These excavations have been assessed by the Arborist who have concluded that these works are highly unlikely to negatively impact the health and condition of the neighbouring trees.



The enclosed *Arboricultural Report* is also accompanied by a Tree Survey & Constraints Plan (Dwg. No. 200930-P-10) and Tree Works & Protection Plan (Dwg. No. 200930-P-11), prepared by CM Arb.

### 5.13 Ecology

A *Screening for Appropriate Assessment*, prepared by Flynn Furney Environmental Consultants, is enclosed with the planning application.

It assessed the potential for significant impacts of the construction and operational phases of the proposed development on Natura 2000 sites and habitat loss/alteration, habitat/species fragmentation, disturbance and/or displacement of species, change in population density and changes in water quality.

All Natura 2000 designated sites within 15km of the proposed works were considered during the screening process for the potential of the proposed development to have significant effects upon their qualifying interests or conservation objectives.

Ten (10 No.) designated sites - Glensmole Valley SAC, the Wicklow Mountains SAC, the Wicklow Mountains SPA, the North Dublin Bay SAC, the South Dublin Bay SAC, the Knocksink Wood SAC, the Ballyman Glen SAC, the North Bull Island SPA, the South Dublin Bay and River Tolka Estuary SPA and Rye Water Valley/Carton SAC - are located within a 15km radius of the subject site.

The *Screening for Appropriate Assessment* states the following:

*'In view of the best and objective scientific knowledge and in view of the conservation objectives of the European sites reviewed in the screening exercise, the proposed development as described here, individually/in combination with other plans and projects (either directly or indirectly) is not likely to have any significant effects on any of the European sites.'*

Further to this, a full ecological impact assessment was undertaken by Flynn Furney Environmental Consultants and the enclosed *Ecological Impact Assessment Report* includes an assessment of potential impacts on biodiversity, including protected species or habitats, that are likely to arise from the proposed development during either the construction or operational phases.

As part of this assessment, an extensive desktop survey was carried out that used available data from suitable sources which included online databases (e.g. National Parks and Wildlife Service and National Biodiversity Data Centre) and previous surveys (e.g. for the Dodder Greenway).



The findings of this study are summarised as follows:

- A very limited range habitats was recorded during survey. The application site was found to contains only built habitat areas. Surveys of the adjacent areas found no habitats listed on Annex I of the EU Habitats Directive within the survey area. No plants subject to the Flora Protection Order (2015) were found to occur within the area surveyed.
- Four (4 No.) areas surveyed were described in the habitat survey as Environmentally Sensitive Areas (ESAs), being of greater sensitivity due to the habitats or species occurring here. These included the River Dodder and mixed broadleaved woodland within the river valley.
- No protected mammal species were found to occur within the area proposed for development. It was noted that suitable habitat for some protected mammal species occurs within the ESAs as described above and that 5 No. protected mammal species have been recorded within 2km of the subject site. However, there is no suitable habitat for these species here.
- A dedicated survey of the existing buildings found no evidence of bat habitation. However, the same survey showed that there is suitable habitat here for bat roosts. Further preconstruction bat surveys are therefore recommended.
- No bird species were recorded as nesting in the existing built habitat at the site. No negative impacts on bird species are therefore predicted. However, it is recommended that a further bird survey is carried out of the buildings prior to development as bird nesting may take place here in the interim period.
- A targeted survey for invasive species was carried out. No invasive species were found at the site proposed for development.
- An evaluation of habitats showed that the site proposed for development is of Low Local value. The significance of impacts here may be described as being of negligible significance. In terms of habitat evaluation, the Dodder Valley pNHA was the only site within the survey area being of national importance. No potential impacts to this designated site were predicted given the location and nature of works. Indeed no other significant effects are predicted for any other habitat type within the survey area.

The *Ecological Impact Assessment Report* submitted as part of this planning application recommends that the proposed mitigation measures contained within are fully implemented in order to minimise any potential for ecological impacts.



## 5.14 Archaeology and Conservation

The planning application is supported by an *Archaeological Impact Assessment and Method Statement*, prepared by AHC Ltd. The Report notes that the proposed development area falls within the Zone of Archaeological Potential associated with Sally Park House (DU022-103----) as recorded on the Record of Monuments and Places. However, as the site is recorded as 'House - 18th/19th century' on the Sites and Monuments Record, the possibility of any physical elements of the RMP site extending into the proposed development area are negligible. It is the opinion of the Project Archaeologist that any impacts on Sally Park house are deemed to be indirect, in the form of impacts on the visual amenity.

The proposed development will not be visible from the grounds on the south side of the house. The development will be visible from the north side of the house, however as this is the rear of Sally Park, with the main façade, south facing, any impacts on the house are deemed only slightly negative.

There are no known archaeological sites within the red line boundary of the development. The townland boundary which runs along the northern site boundary is notable and takes the form of a rubble stone and cement-built wall. It is proposed to maintain this boundary largely untouched and consequently, the impacts here will be negligible.

The other site of interest discussed in the *Archaeological Impact Assessment and Method Statement* is the 'Smithy' recorded on the 4<sup>th</sup> ed of c. 1900. As such, it was recommended by the Archaeologist that a Level 2 Architectural Survey be carried out on the single storey 'Smithy' due to its proposed demolition.

The Applicant, therefore, engaged the services of Mesh Conservation Architects prior to advancing the project any further without getting a professional opinion from a qualified Conservation Architect. Mesh Architects undertook a site visit on the 1<sup>st</sup> of September 2021 to inspect the building in question. The Conservation Architect was of the opinion that the 'Smithy' building is simply an early 20<sup>th</sup> century cottage and that it replaced whatever earlier building might have stood on that site. Nothing in the existing structure appeared to be from the first half of the 19th century and there was no evidence of anything like a blacksmith's forge on the subject site. The enclosed *Heritage Assessment* report, prepared by Mesh Architects, provides further details and photographic evidence in respect of the cottage and other buildings on site.

## 5.15 Engineering

The planning application is supported by a full suite of engineering proposals to serve the proposed development, including extensive SuDS proposals which are further detailed in the *Water Services Report*, prepared by PHM Consulting.

### Foul Water Drainage

All foul drainage is to be drained by gravity via a minimum 225mm sewer system and is to be connected to the existing public sewer. Currently, there is an existing a 225mm connection which serves the existing buildings on site. The main sewer runs north along Mount Carmel Park. It is proposed to connect the proposed development via a replacement connection to this same public sewer.



Figure: 5.2; The current Irish Water infrastructure adjacent to the subject site (source: Irish Water)

We confirm that Irish Water have confirmed capacity in the receiving network, as reflected in the Confirmation of Feasibility letter, dated 28<sup>th</sup> January 2021, and appended to the *Water Services Report* (Appendix G).

Refer to Section 4.0 of the *Water Services Report*, prepared by PHM Consulting, for further details.

### Storm Water Drainage

The proposed stormwater drainage strategy is to collect all run-off from roofs, upper level garden areas, ground level paved areas and trafficked areas and discharged to the public sewer network located on Mount Carmel Park. Where possible, all water will be conveyed via a gravity system. It is proposed to incorporate sustainable drainage techniques where possible within the system in order to mitigate the impact of the development on receiving networks and waters.



Currently, there is a 300mm surface water sewer which traverses diagonally across the rear of the subject site, falling in a west to east direction to Mount Carmel Park. It is proposed to divert this 300mm pipe out of the site and along Firhouse Road and Mount Carmel Park, resulting in this public sewer being provided within the public space owned by South Dublin County Council and not in private lands as it is currently. SuDS mechanisms incorporated into the proposed development have been outlined previously in this Report.

The design of the drainage strategy has been evaluated in terms of the guidance provided by the *South Dublin County Council Sustainable Drainage Explanatory Design & Evaluation Guide 2022 (SDEDEG)*. The design of the surface water drainage network will take cognisance of the objectives and guidance contained in the Greater Dublin Strategic Drainage Study (GDSDS) also. In collaboration with the landscaping design, the surface water run-off will be reduced through the use of a variety of elements provided throughout the development (refer to Dwg. No. 110-36-122, prepared by PHM Consulting) resulting in c. 290.5m<sup>3</sup> of surface water storage.

Refer to Section 5.0 of the *Water Services Report*, prepared by PHM Consulting for further details.

#### Existing System and Diversions

There are a number of existing watermains traversing the subject site which are historic to the original route of Firhouse Road. It is proposed to rationalise the current arrangement through the provision of new watermains to be located on the Firhouse Road in order to simplify the current arrangement. A diversion application has been registered with the Irish Water in this regard.

A Diversion Agreement has been issued by Irish Water on the 11<sup>th</sup> May 2022 for the proposed diversion works and is included in Appendix G to the enclosed *Water Services Report*, prepared by PHM Consulting (See also Dwg. No. 110-36-140) for the proposed layout arrangement.

#### Proposed System and Connection Point

The existing buildings are served the existing public main on Firhouse Road. It is proposed to terminate these connections in lieu of a newly proposed 100mm PE connection off the existing 250mm MDPE watermain located on the south side of Firhouse Road. Within the public open area located at the entrance to the proposed development, a bulk watermeter is to be provided. Each apartment unit will be serviced with individual supplies from centralised location in the basement and have individual internal meters.

Additionally, an assessment of the existing hydrants on Firhouse Road and Mount Carmel Park has been carried out for the purposes of the planning application. It is proposed to provide additional fire hydrants on Firhouse Road and Mount Carmel Park to ensure the proposed development is with 46m of an operational hydrant. Fire-fighting provisions will also be provided internally.



Refer to Section 6.0 of the *Water Services Report*, prepared by PHM Consulting, for further details.

### **Construction and Demolition**

A *Construction Waste Management Plan (CWMP)*, prepared by PHM Consulting, is submitted as part of this planning application. During the construction and demolition phases, waste will be produced from surplus materials such as broken or off-cuts of timber, plasterboard, concrete, tiles, bricks, etc. Waste from packaging (cardboard, plastic, timber) and oversupply of materials may also be generated. The construction contractor will be required to ensure that oversupply of materials is kept to a minimum and opportunities for reuse of suitable materials is maximised.

Waste will also be generated from construction workers e.g., organic/food waste, dry mixed recyclables (wastepaper, newspaper, plastic bottles, packaging, aluminium cans, tins and Tetra Pak cartons), mixed non-recyclables and potentially sewage sludge from temporary welfare facilities provided onsite during the construction phase. Waste printer/toner cartridges, waste electrical and electronic equipment (WEEE) and waste batteries may also be generated infrequently from site offices.

### **Operational Phase**

An *Operational Waste Management Plan*, prepared by OCSC Consulting Engineers, is enclosed and outlines measures to maximise the quantity of waste recycled by providing sufficient waste recycling infrastructure, waste reduction initiatives and waste collection and waste management information to the residents and tenants of the development.

### **Construction Environmental Management Plan (CEMP)**

The *Construction Environmental Management Plan (CEMP)*, prepared by PHM Consulting, is submitted with this planning application. The CEMP outlines construction phase mitigation and management of; air quality control (dust), noise and vibration, fuel and chemical handling groundwater and surface water, and erosion and sediment control measures that will be undertaken during the construction phase. All mitigation measures outlined therein will be implemented, as well as any additional measures required pursuant to planning conditions which may be imposed.

### **Flooding**

The potential risk of flooding on the site was reviewed with regard to incidences of historical, regional and local flooding relevant to the area of the subject site. A Flood Risk Assessment, prepared by PHM Consulting, forms Section 7.0 of the enclosed *Water Services Report*.

In summary, having considered the various forms of flooding which presents risk to persons and property – fluvial, coastal, pluvial, groundwater, the report concludes that the proposed



development is located within a Flood Zone C, and is therefore deemed acceptable under the Flood Protection Guidelines.

In terms of flooding from potential infrastructural failure the Flood Risk Assessment states:

*'Existing 250mm dia. MDPE Watermain located on the south side of the Firhouse Road if fails will discharge water in the direction of the proposed development. A surface water channel is to be provided across the proposed Firhouse Road entrance which will channel waters north of the entrance and around the development onto Mount Carmel Park.'*

Within the proposed development, surface/storm waters will be managed through the provision of natural SuDS methods. In a storm event, a large volume of water will be retained through various elements provided throughout the development. Additionally, the SuDS system has been designed to cater for the critical 1:30 year storm event without the inundation of the site, the public roads or third party lands. Only in the event of a 1:100 storm will there be a risk of inundation of the lower basement level to a maximum depth of 60mm.

### **Environmental Impact Assessment Screening**

An *Environmental Impact Assessment Screening Report*, prepared by AWN Consulting, is enclosed with this planning application.

This Report considers whether there is a requirement for the preparation of an Environmental Impact Assessment Report (EIA) to accompany this SHD planning application to An Bord Pleanála (ABP), and to provide ABP with the information required under Schedule 7A of the *Planning and Development Regulations 2001, as amended*, to enable the Board to determine in light of the criteria set out under Schedule 7 of those regulations whether the proposed development is likely to have significant effects on the environment.

The proposed development and component parts have been considered against the thresholds outlined in Schedule 5, Part 2 Class 10 (a) to (m).

The most relevant project type in the context of the proposed development is Class 10 (b) (i) and (iv);

#### *'10. Infrastructure projects*

- (b) (i) *Construction of more than 500 dwelling units*
- (iv) *Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.'*



On the basis of the evaluation set out in Section 2.0 of the *Environmental Impact Assessment Screening Report*, an EIA for the proposed development is not mandatory. The proposed development is considered to be a sub-threshold development and therefore, ABP is required to assess whether the proposed development is likely to have significant effects on the environment in order to determine whether the submission of an EIAR is required. The information necessary to enable this screening assessment has been provided in the EIA Screening Report.

It has been concluded that the proposed development is not considered to have likely significant effects on the environment (direct, indirect or cumulatively with other development) and therefore it is considered that an environmental impact assessment report is not required in this instance.



## 6.0 CONCLUSION

As described in detail above and within the *Statement of Consistency*, the proposed strategic housing development is considered compliant with local, regional and national policy and guidance.

Further to the above, we provide some key points below which confirms the proposed development's compliance with the relevant policy and guidance and the proper planning and sustainable development of the surrounding area:

- The proposed development will deliver 100 No. new residential units and therefore make a significant contribution to the delivery of housing in Firhouse and the wider context on currently underutilised serviced lands. The proposed SHD provides a good housing mix, reflective of local needs.
- In line with Part V of the *Planning and Development Act 2000* (as amended), 20% of the proposed units are social and affordable. From a housing delivery perspective, this is considered to constitute a significant public benefit.
- As such, we maintain that the development will provide community local services and housing choices for a diversity of residents.
- Further in line with the policy requirements, the proposed SHD scheme provides c. 29% public open space, significantly in excess of the 10% required by the *Development Plan*. The public open space is high quality, accessible and inclusive in nature.
- The proposed connectivity and permeability embedded within the proposal facilitates the sustainable movement of future and existing residents. The provision of connections into existing streets provides a positive contribution to the surrounding area from a placemaking perspective.
- The design of the proposed SHD, including the transition in building height, gives rise to a sensitive relationship with existing surrounding development and minimises impact from an overlooking, loss of light and microclimate perspective, as demonstrated by the detailed *Daylight & Sunlight Report*
- The proposed development provides increased residential density and height in line with the national guidelines while achieving an excellent overall standard of accommodation for future occupiers.
- The proposed SHD is supported by a full suite of environmental assessments which demonstrates that the proposed development would not give rise to likely significant impacts upon the environment.



- The enclosed *Screening for Appropriate Assessment* report concludes that no significant impacts are likely on Natura 2000 sites, alone in combination with other plans and projects based on the implementation of mitigation measures.

We trust that this submission is in order and look forward to written acknowledgement of receipt of this application in due course. Please revert to the undersigned with any queries arising.

Yours sincerely,



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**Lizzie Donnelly**  
**Associate**  
**Tom Phillips + Associates**