

## RESPONSE TO AN BORD PLEANÁLA OPINION 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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## 1.0 INTRODUCTION

This response document addresses issues raised by An Bord Pleanála (ABP) in its Opinion issued to the Applicant on 22<sup>nd</sup> February 2022, on foot of the Pre-Application Consultation stage of the subject SHD Application (ABP Ref. 310640-21).

Specifically, it outlines how the Applicant has addressed the issues highlighted in ABP's *Notice of Pre-Application Consultation Opinion* (the 'Opinion') of February 2022. (Appendix A.) (See Section 2)

In addition, pursuant to article 285(5) (b) of the *Planning and Development (Strategic Housing Development) Regulations 2017*, the Board notified the prospective applicant that in addition to the 4 No. issues highlighted in the Board's Opinion, other specific information should be submitted to ensure a full application. This is detailed in Section 3 of this Response.

Please note that the Opinion is a pre-condition to the making of a valid application direct to the Board and has been published into the public domain by An Bord Pleanála. This response to the Opinion and any references in this application generally are made to establish the formal proofs for the making of a valid application and for narrative and historical context. Having regard to section 6(9) of the *Planning and Development (Housing) and Residential Tenancies Act 2016*, as amended, no reliance whatsoever is placed on the Opinion for the purposes of this formal planning process.

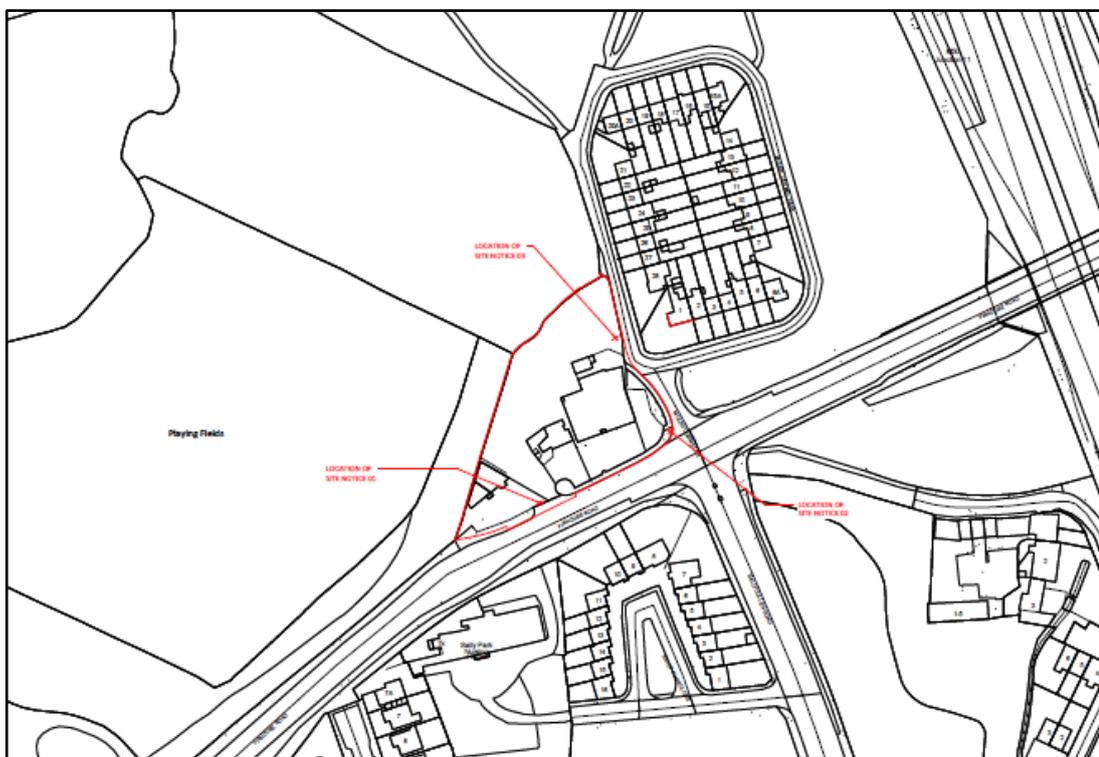


Figure 1.1: Extract from the Site Location Plan, prepared by OMP Architects.



## 2.0 RESPONSE TO ISSUES RAISED BY AN BORD PLEANÁLA

The Board's Opinion states:

*'An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.'*

*An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.'*

The Board has requested specific information to be provided in relation to the following 4 No. items:

1. Development Strategy
2. Architectural Design Approach
3. Landscaping, Materials and Character
4. Residential Design

We set out below how each of the requirements has been addressed. Firstly, we provide an overview of the changes that have occurred between the Pre-Application SHD scheme and the current proposed SHD scheme. See Table 2.1 below for a tabulated comparison between the Pre-Application SHD scheme and the final SHD scheme.

- 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.

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	355 sq m
Gross Residential Density	224 units p/h	217 units p/h
Plot Ratio	1.6	1.7:1
Site Coverage	42%	44%
Public Open Space	c. 844 sq m (18.5%)	c. 1,347 sq m (29%)
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. creche, retail and other)
Bicycle Parking	196 No. spaces (152 No. at basement level and 44 No. at surface level)	270 No. spaces (226 No. at basement level and 44 No. at surface level)

Table 2.1: Comparison between Pre-Application Scheme and Final SHD Scheme

## 2.1 ABP Issue No. 1 – Development Strategy

The ABP Opinion states:

*‘Further justification for the proposal in light of the ‘LC’ zoning objective, ‘To protect, improve and provide for the future development of Local Centres’’, and non-residential uses at ground level proposed. The predominant use proposed in the scheme is residential, a local centre zoning would envisage a greater degree of mixed use in particular at ground level.’*

### ***Applicant’s Response***

The Pre-Application SHD scheme comprised 103 No. units and a mix of non-residential uses which included a crèche (110 sq m), a café (63 sq m), a betting office (80 sq m) and a retail unit (83 sq m) at basement level and ground floor levels, with a total gross floor area of c. 336 sq m.

In response to Issue No. 1, revisions to the scheme have been made by OMP Architects to incorporate additional non-residential spaces at ground level based on feedback from An Bord Pleanála and the Local Authority at the Pre-Application Meeting. The current proposed SHD scheme now comprises 100 No. residential unit with a greater share of mix of non-residential uses, including a café (c. 58 sq m), office (c. 30 sq m), medical unit (c. 59 sq m), betting office (c. 66 sq m) and a barber shop (c. 28 sq m) all at ground floor level, with a crèche (c. 114 sq m) at lower ground floor level to the northeast of the site. The total gross floor area of all non-residential uses proposed is c. 355 sq m (Refer to Figure 2.1 below for location of all non-residential uses).



**Figure 2.1:** 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.

We further highlight compliance with the following policy objectives regarding ‘Local Centres’ contained within Section 5.1.4 of the *South Dublin County Council Development Plan 2016 – 2022*:

*‘URBAN CENTRES (UC) Policy 5 Local Centres:*

*It is the policy of the Council to encourage the provision of an appropriate mix, range and type of uses in Local Centres, including retail, community, recreational, medical and childcare uses, at a scale that caters predominantly for a local level catchment, subject to the protection of the residential amenities of the surrounding area.’*

The proposed development includes a range of appropriate uses which include retail, medical and childcare uses in accordance with the overarching ‘Local Centre’ policy. The proposal also incorporates a large area of public open space (c. 1,347 sq m) fronting onto Firhouse Road and Mount Carmel Park which can be used by the local catchment for recreational purposes. The design strategy and the enclosed technical assessments further demonstrate that the surrounding residential amenity will not be detrimentally affected as a result of the proposal.

*‘UC5 Objective 1: To support the improvement of local centres, and encourage the use of upper floors, with due cognisance to the quality of urban design, integration, linkage, accessibility and protection of residential amenity.’*

The site currently accommodates the premises of an existing vacant public house (incl. an ancillary off licence) betting office and barbers’ shop and at present does not act like a ‘Local



Centre'. The proposed development, which includes residential upper floor levels, will therefore be a significant improvement on the existing site conditions. The Design Team have made considerable revisions to the scheme over the course of the SHD process in terms of achieving high quality urban design, integration, linkages, connections and accessibility, whilst also being cognisant of future and existing residential amenity.

*'UC5 Objective 2: To support and facilitate the location of small scale community facilities within accessible local centres and as part of large scale commercial development where a deficiency in community space is demonstrated, subject to adaptable design for a variety of uses.'*

The proposed scheme does not include a specific community use, however, we note the findings of the enclosed *Community and Social Infrastructure Audit*, prepared by Tom Phillips + Associates, which demonstrates that there is an adequate supply of community facilities (amongst others) within c. 15-minutes' drive of the subject lands. We further emphasise the array of other non-residential uses (discussed above) which form part of the proposed development and are fully supported by the site's zoning objective. Additionally, the residential units have been designed to cater to the ageing population and are fully accessible.

*'UC5 Objective 3: To improve walking and cycling infrastructure within the local catchment of centres.'*

The proposed development incorporates a 2.0 metres wide footpath along Firhouse Road and a parallel pedestrian footpath traversing the site (immediately adjacent the southern building elevation measuring c. 3m), providing a cumulative total pedestrian infrastructure width of 5m. Full details on the proposed walking and cycling infrastructure can be found in the enclosed *Traffic and Transport Assessment*, prepared by Transport Insights and the *Landscape Architecture Design Rationale + Statement Of Response*, prepared by Studio Aula.

With regard to 'Local Centres', Section 5.1.4 of the *South Dublin County Council Development Plan 2016 - 2022* states:

*'Local Centres are commercial centres that provide day to day services and facilities to cater for a local catchment. **The scale and function of local centres vary.** A Local Centre Zoning Objective is applied to these areas.'* (our emphasis.)

As noted above, the scale and function of local centres vary, and we submit that it is evident that the proposed mix of uses, alongside a generously landscaped area of public open space, will provide additional day to day services to cater for the local catchment.

Further justification on how the proposed development complies with the land use zoning objective 'LC' is contained within the enclosed *Statement of Consistency*, which has due regard to policy objectives contained within both the *South Dublin County Council Development Plan 2016 - 2022* and the *Draft South Dublin County Development Plan 2022-2028*.

Having regard to the details provided above, we confirm that we have responded in full to ABP's Issue No. 1.

## 2.2 ABP Issue No. 2 – Architectural Design Approach

The ABP Opinion states:

*‘Further justification for the height strategy, integration with the wider area and specifically how transition occurs in terms of design, presentation, quality community and place making. A key issue at this location is the existing environment and specifically how transition occurs between the existing established development along Mount Carmel Park to the north east and the Firhouse Road and the proposed development, cognisance being had that this development will be highly visible on approach from the surrounding area.’*

### **Applicant’s Response**

We confirm that an *Architectural Design Statement*, inclusive of an urban design statement, has been prepared by OMP Architects and is enclosed with this planning application. We further highlight that the proposed development is supported by a large array of CGIs and photomontages which effectively illustrate the relationship of the proposed development with the surrounding context, including the existing buildings within the wider area.

OMP Architects has also provided a *Statement of Response* which addresses Issue No. 2 from an architectural perspective and demonstrates how the proposed height strategy results in a high quality and positive design intervention at this location. This response has regard to the relationship between the proposed development, the existing residential buildings, the public realm and adjacent lands and development. Refer to the *Statement of Response* for full details.

The enclosed *Verified Photomontages*, prepared by Digital Dimensions, further demonstrate that the proposed building heights are compatible with the surrounding context, including the existing established development along Mount Carmel Park. Further to this, Doyle + O’Troithigh Landscape Architecture Ltd. has provided a *Visual Impact Assessment (VIA)* to appraise the visual impacts arising from the proposed development based on the verified photomontages.

Having regard to the details provided above, we confirm that we have responded in full to ABP’s Issue No. 2.

## 2.3 ABP Issue No. 3 – Landscaping, Materials and Character:

The ABP Opinion states:

*‘Further consideration/justification of the documents as they relate to the visual impact, materials and finishes to the proposed buildings and hard & soft landscaping. The further consideration / justification should address the character and identity and creation of inclusive people friendly neighbourhood, regard being had, inter alia, to the architectural treatment, landscaping, quality public and communal open spaces, pedestrian way finding and connectivity. The*



*further consideration of these issues may require an amendment to the documents and/or design proposals submitted.'*

### Applicant's Response

As discussed above, Digital Dimensions has produced verified photomontages of the proposed development from a number of viewpoints, including from Mount Carmel Park and Firhouse Road, which should be reviewed in conjunction with the enclosed VIA.

The VIA has regard to the impact of the proposed development from surrounding viewpoints, in the context of:

- Mount Carmel Park
- The streetscape along Firhouse Road
- Dodder Valley Park
- Nearby Protected Structures, namely, Balrothery Weir and Sally Park Nursing Home
- The N81 (Protected Views)

As part of this, it is noted that the proposed development would result in a substantial change to the existing site conditions given the introduction of new mid to large scale buildings together with changes to the immediate landscape. Notwithstanding this, the VIA concludes that the proposed scheme comprises a series of measures that will ensure a long-term positive impact to the area, in particular to Firhouse Road. Refer to the VIA for full details.

The *Statement of Response*, prepared by OMP Architects, includes the response to Issue No. 3 of the ABP Opinion and addresses the character and identity and creation of inclusive people friendly neighbourhood having regard to regard the architectural treatment.

Additionally, Section 3.3 of the enclosed *Landscape Architecture Design Rationale + Statement of Response*, prepared by Studio Aula, provides full details on the landscaping proposals, public and communal open spaces, pedestrian way finding and connectivity.

Having regard to the details provided above, we confirm that we have responded in full to ABP's Issue No. 3.

## **2.4 ABP Issue No. 4 – Residential Design**

The ABP Opinion states:

*'Further consideration/justification of the documents as they relate to the quality of the proposed residential amenity. This consideration should have regard to, inter alia, the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual'); the 'Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities' in particular with regard to number of single aspect and north facing units, and daylight and sunlight access to internal habitable areas and in particular to communal courtyards. Shadow Impact Assessment of communal open spaces, private open space and public open spaces.*



*The further consideration of this issue may require an amendment to the documents and/or design proposals submitted relating, inter alia, to layout of the proposed development, improving the quality and providing extended hours of daylight and sunlight to the internal courtyards and to the public open space.'*

#### Applicant's Response

Detailed justification for the proposed materials and finishes is provided within the *Architectural Design Statement* and the *Statement of Response*, prepared by OMP Architects.

A detailed study to address issues of amenity for existing residents in adjacent dwellings and future occupants of the proposed development has also been undertaken by OMP Architects. The enclosed contiguous elevation drawings show the relationship between the proposed development and adjacent residential developments and is further discussed in the *Statement of Response*.

The *Statement of Response* also includes a section which illustrates the relationship between the proposed buildings within the site and the relationship with adjacent sensitive uses such as the residential developments along Firhouse Road and Mount Carmel Park. The report also includes design analysis in terms of the interface between the proposed development and the Dodder Valley Park (High Amenity Area), nearby Protected Structures, the west/north boundary wall and the mature trees within the neighbouring site.

A detailed *Daylight & Sunlight Report* is also included with this application submission and concludes that the 25° line and the Vertical Sky Component (VSC) analysis have shown that a negligible daylight impact will be perceived by the surrounding properties. Additionally, the overshadowing analysis has shown that there will be limited overshadowing due to the proposed development, aside from on 4 p.m. in March, and 2 p.m. onwards in December.

Having regard to the details provided above, we confirm that we have responded in full to ABP's Issue No. 4.

### **3.0 ABP REQUEST TO PROVIDE ADDITIONAL INFORMATION**

The Board's Opinion states:

*'Furthermore, Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:..'*

The Board has requested specific information to be provided in relation to 18 No. items.

We set out below how each of the requirements has been addressed.



### 3.1 ABP Requirement No. 1 – A detailed Statement of Consistency

The ABP Opinion notes the requirement for:

*‘A detailed statement of consistency and planning rationale, clearly outlining how in the prospective applicant’s opinion, the proposal is consistent with local planning policies having specific regard to the zoning objective of the site, “LC” – local centre and its applicability to the development site in question having regard to the concerns raised in the Planning Authority’s opinion.’*

#### ***Applicant’s Response***

A *Statement of Consistency and Planning Report*, prepared by Tom Phillips + Associates, containing the above referenced information, is enclosed with this planning application.

### 3.2 ABP Requirement No. 2 – Architectural Design Statement

The ABP Opinion notes the requirement for:

*‘An updated Architectural Design Statement. The statement should include a justification for the proposed development, having regard to, inter alia, urban design considerations, visual impacts, site context, the locational attributes of the area, linkages through the site, pedestrian connections and national and local planning policy. The statement should specifically address finishes of the blocks, the design relationship between the individual blocks within the site, the relationship with adjoining development and the interface along the site boundaries, in particular, the Firhouse Road, Mount Carmel Park Housing Estate to the northeast and the Mount Carmel Park high amenity area and Protected Structure grounds including mature deciduous tree line and stone party boundary wall to the north. The statement should be supported by contextual plans and contiguous elevations and sections.’*

#### **Applicant’s Response**

An updated *Architectural Design Statement*, prepared by OMP Architects, containing the above referenced information, is enclosed with this planning application.

### 3.3 ABP Requirement No. 3 – Material Contravention Statement

The ABP Opinion notes the requirement for:

*‘A detailed statement, which should provide adequate identification of all such elements and justification as applicable, where the proposed development materially contravenes the Development Plan and other than in relation to the*



*zoning of the land, indicating why permission should, nonetheless, be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000.'*

Applicant's Response

A *Material Contravention Statement*, prepared by Tom Phillips + Associates, containing the above referenced information, is enclosed with this planning application.

### 3.4 ABP Requirement No. 4 – Visual Impact Assessment

The ABP Opinion notes the requirement for:

*'A visual impact assessment of the proposed development that addresses, inter alia, the scale and massing of the proposal in the context of the transitional nature of the receiving environment, which includes domestic scale two storey development to the northeast in Mount Carmel Park Housing Estate. The VIA should also address long range views from the N81 and along Firhouse Road including the proposed treatment to the public realm.'*

Applicant's Response

A *Visual Impact Assessment (VIA)*, prepared by Doyle & O' Troithigh Landscape Architecture, containing the above referenced information, is enclosed with this planning application.

### 3.5 ABP Requirement No. 5 – Material and Finishes

The ABP Opinion notes the requirement for:

*'A report that specifically addresses the proposed building materials and finishes and the requirement to provide high quality and sustainable finishes and details.'*

Applicant's Response

A *Statement of Response* and an *Architectural Design Statement*, prepared by OMP Architects, containing the above referenced information, is enclosed with this planning application.

### 3.6 ABP Requirement No. 6 – Location, Hierarchy and Quantum of Open Space Provision,

The ABP Opinion notes the requirement for:

*'Justification of location, hierarchy and quantum of open space provision, both communal and public open space (POS). Clarity with regard to compliance with Development Plan standard.'*

Applicant's Response

The enclosed *Landscape Architecture Design Rationale + Statement of Response*, prepared by Studio Aula, includes full details on the location, hierarchy and quantum of the open space



provision. The *Statement of Consistency and Planning Report*, prepared by Tom Phillips + Associates, also demonstrates compliance with the relevant standards contained within the *South Dublin County Council Development Plan 2016 - 2022* and the *Draft South Dublin County Development Plan 2022-2028*.

### 3.7 ABP Requirement No. 7 – Public Open Space v Communal Open Space

The ABP Opinion notes the requirement for:

*‘Clarity in respect of what is designated as communal open space and what is designated as public open space. Whether it is intended that the public open space will be taken in charge, and if not, a maintenance costs, access and liabilities report to set out responsibility for open space areas.’*

#### Applicant’s Response

The enclosed Open Space Plan (Dwg. No. 20022-OMP-ZZ-ZZ-DR-A-6003), prepared by OMP Architects, provides clarity with regards to what open spaces are designated public, private and communal spaces. No area of public open space is proposed to be taken in charge by the Local Authority.

As such, this application is 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 (See Appendix C of this report).

### 3.8 ABP Requirement No. 8 – Housing Quality Assessment

The ABP Opinion notes the requirement for:

*‘A Housing Quality Assessment that provides details in respect of the proposed apartments set out as a schedule of accommodation, with the calculations and tables required to demonstrate compliance with the various requirements of the 2020 Guidelines on Design Standards for New Apartments. It is important that the proposal meets and preferably exceeds the minimum standards in terms of dual aspect and proportion of apartment which exceed the floor area by 10%. In the interests of clarity clear delineation / colour coding of floor plans indicating which of the apartments are considered by the applicant as dual / single aspect, single aspect north facing and which apartments exceeds the floor area by 10%.’*

#### Applicant’s Response

A *Housing Quality Assessment* (HQA) is enclosed, prepared by OMP Architects, containing the above referenced information.



### 3.9 ABP Requirement No. 9 – Residential Amenities

The ABP Opinion notes the requirement for:

*‘A report that addresses issues of residential amenity, specifically with regards to potential overlooking, overshadowing and overbearing. The report shall include full and complete drawings including levels and cross-sections showing the relationship between the proposed blocks within the scheme and to adjacent residential development.’*

#### Applicant’s Response

A *Statement of Response* and an *Architectural Design Statement*, prepared by OMP Architects, containing the above referenced information, is enclosed with this planning application. The enclosed *Daylight & Sunlight Report* also addresses any potential overshadowing impacts as a result of the proposed development.

### 3.10 ABP Requirement No. 10 – Daylight and Shadow Impacts

The ABP Opinion notes the requirement for:

*‘A Daylight and Shadow Impact Assessment of the proposed development, specifically with regard to:*

- (i) Impact upon adequate daylight and sunlight for individual units, public open space, courtyards, communal areas, private amenity spaces and balconies.*
- (ii) Impact to neighbouring properties devoid of proposed and existing landscaping and trees.*
- (iii) Impact to future residents and Block C, in particular, regard being had to mature trees to the north of the site, in private ownership, outside of the control of the applicant.’*

#### Applicant’s Response

A *Daylight & Shadow Report*, prepared by OCSC Consulting Engineers, containing the above referenced information, is enclosed with this planning application.

### 3.11 ABP Requirement No. 11 – Water and Drainage Infrastructure

The ABP Opinion notes the requirement for:

*‘Clarification at application stage regarding connection to water and drainage infrastructure having regard to the Irish Water submission, submitted to the Board on the 21.10.2021.’*



### Applicant's Response

The Applicant has consulted with Irish Water during the preparation of the final scheme. Refer to the *Water Services Report* (Appendix G), prepared by PHM Consulting, which includes a letter a Confirmation of Feasibility, dated 28<sup>th</sup> January 2021, and Statement of Design Acceptance, dated 13<sup>th</sup> May 2022, issued by Irish Water with respect to the proposed development.

#### **3.12 ABP Requirement No. 12 – PA Opinion**

The ABP Opinion notes the requirement for:

*'Response to issues raised in the PA Opinion received by An Bord Pleanála on the 23rd July 2021.'*

A full response to South Dublin County Councils' Opinion is provided at Appendix B of this report. The Design Team have also included responses to SDCC's Opinion as required in the enclosed assessment reports.

#### **3.13 ABP Requirement No. 10 – Life Cycle Report**

The ABP Opinion notes the requirement for:

*'A life cycle report shall be submitted in accordance with section 6.13 of the Sustainable Urban housing: Design Standards for New Apartments (2020). The report should have regard to the long-term management and maintenance of the proposed development. The applicant should consider the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, child friendly spaces, pathways, and all boundary treatments. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development.'*

### Applicant's Response

A *Building Lifecycle Report*, prepared by OMP Architects, containing the above referenced information, is enclosed with this planning application.

#### **3.14 ABP Requirement No. 14 – EIA Screening and Section 299B Statement**

The ABP Opinion notes the requirement for:

*'Where an EIAR is not being submitted the applicant should submit all necessary information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 for the purposes of EIA screening.'*



Applicant's Response

An *Environmental Impact Assessment Screening Report* and a *Statement in Accordance with Article 299b (1)(B)(li)(li)(C) of the Planning and Development Regulations 2001–2021*, prepared by AWN Consulting, containing the above is enclosed with this planning application.

**3.15 ABP Requirement No. 15 – Ecology**

The ABP Opinion notes the requirement for:

*'An up to date Ecological Impact Assessment, inclusive of a Bird and Bat Survey.;*

Applicant's Response

An *Ecological Impact Assessment, Bat Survey Report* and *Bird Survey Report*, prepared by Flynn Furney Environmental Consultants Ltd, containing the above referenced information, is enclosed with this planning application.

**3.16 ABP Requirement No. 16 – Taken in Charge Areas**

The ABP Opinion notes the requirement for:

*'A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.'*

Applicant's Response

A Proposed Taken in Charge Areas plan (Dwg. No. 20022-OMP-00-ST-DR-A-1003), prepared by OMP Architects, shows all areas proposed to be taken in charge by the Local Authority and is enclosed with this planning application.

**3.17 ABP Requirement No. 17 – Construction and Demolition Waste Management Plan**

The ABP Opinion notes the requirement for:

*'Site Specific Construction and Demolition Waste Management Plan.'*

Applicant's Response

A *Construction and Demolition Waste Management Plan*, prepared by PHM Consulting, is enclosed with this planning application.

### 3.18 ABP Requirement No. 18 – Public Lighting

The ABP Opinion notes the requirement for:

*‘Details of public lighting.’*

#### Applicant’s Response

A public lighting plan, prepared by OCSC Consulting Engineers, is enclosed with this planning application.

### 4.0 CONCLUSION

We consider that all issues that have been raised during the Pre-Application Consultation process have been sufficiently addressed in the final Application, now before the Board for consideration.

The proposed Strategic Housing Development of, *inter alia*, 100 No. units will provide a strategically important contribution to housing delivery in the administrative area of South Dublin County Council.

This document specifically addresses the specific information requested by An Bord Pleanála in relation to the development proposed.

The relevant prescribed bodies/authorities identified by the Board in the Pre-Application correspondence have been notified of the submission of the Planning Application in accordance with Section 8(1)(b) of the *Planning and Development (Housing) and Residential Tenancies Act, 2016* (as amended).

Yours faithfully



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

## Appendix A – Copy of Opinion



**Case Reference:  
ABP-311459-21**

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**Planning and Development (Housing) and Residential Tenancies Act 2016  
Notice of Pre-Application Consultation Opinion**

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**Proposed Development:** Demolition of existing buildings on site, construction of 103 no. apartments, creche and associated site works.

**No. 2 Firhouse Road and the former "Morton's, The Firhouse Inn", Firhouse Road, Firhouse, Dublin 24.**

An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.

An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.

1. Development Strategy: Further justification for the proposal in light of the 'LC' zoning objective, 'To protect, improve and provide for the future development of Local Centres', and non-residential uses at ground level proposed. The predominant use proposed in the scheme is residential, a local centre zoning would envisage a greater degree of mixed use in particular at ground level.



2. Architectural Design Approach: Further justification for the height strategy, integration with the wider area and specifically how transition occurs in terms of design, presentation, quality community and place making. A key issue at this location is the existing environment and specifically how transition occurs between the existing established development along Mount Carmel Park to the north east and the Firhouse Road and the proposed development, cognisance being had that this development will be highly visible on approach from the surrounding area.
3. Landscaping, Materials and Character: Further consideration/justification of the documents as they relate to the visual impact, materials and finishes to the proposed buildings and hard & soft landscaping. The further consideration / justification should address the character and identity and creation of inclusive people friendly neighbourhood, regard being had, inter alia, to the architectural treatment, landscaping, quality public and communal open spaces, pedestrian way finding and connectivity. The further consideration of these issues may require an amendment to the documents and/or design proposals submitted.
4. Residential Design - Further consideration/justification of the documents as they relate to the quality of the proposed residential amenity. This consideration should have regard to, inter alia, the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual'); the 'Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities' in particular with regard to number of single aspect and north facing units, and daylight and sunlight access to internal habitable areas and in particular to communal courtyards. Shadow Impact Assessment of communal open spaces, private open space and public open spaces. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted relating, inter alia, to layout of the proposed development, improving the quality and providing extended hours of daylight and sunlight to the internal courtyards and to the public open space.



Furthermore, Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. A detailed statement of consistency and planning rationale, clearly outlining how in the prospective applicant's opinion, the proposal is consistent with local planning policies having specific regard to the zoning objective of the site, "LC" – local centre and its applicability to the development site in question having regard to the concerns raised in the Planning Authority's opinion.
2. An updated Architectural Design Statement. The statement should include a justification for the proposed development, having regard to, inter alia, urban design considerations, visual impacts, site context, the locational attributes of the area, linkages through the site, pedestrian connections and national and local planning policy. The statement should specifically address finishes of the blocks, the design relationship between the individual blocks within the site, the relationship with adjoining development and the interface along the site boundaries, in particular, the Firhouse Road, Mount Carmel Park Housing Estate to the northeast and the Mount Carmel Park high amenity area and Protected Structure grounds including mature deciduous tree line and stone party boundary wall to the north. The statement should be supported by contextual plans and contiguous elevations and sections.
3. A detailed statement, which should provide adequate identification of all such elements and justification as applicable, where the proposed development materially contravenes the Development Plan and other than in relation to the zoning of the land, indicating why permission should, nonetheless, be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000.
4. A visual impact assessment of the proposed development that addresses, inter alia, the scale and massing of the proposal in the context of the transitional



nature of the receiving environment, which includes domestic scale two storey development to the northeast in Mount Carmel Park Housing Estate. The VIA should also address long range views from the N81 and along Firhouse Road including the proposed treatment to the public realm.

5. A report that specifically addresses the proposed building materials and finishes and the requirement to provide high quality and sustainable finishes and details.
6. Justification of location, hierarchy and quantum of open space provision, both communal and public open space (POS). Clarity with regard to compliance with Development Plan standard.
7. Clarity in respect of what is designated as communal open space and what is designated as public open space. Whether it is intended that the public open space will be taken in charge, and if not, a maintenance costs, access and liabilities report to set out responsibility for open space areas.
8. A Housing Quality Assessment that provides details in respect of the proposed apartments set out as a schedule of accommodation, with the calculations and tables required to demonstrate compliance with the various requirements of the 2020 Guidelines on Design Standards for New Apartments. It is important that the proposal meets and preferably exceeds the minimum standards in terms of dual aspect and proportion of apartment which exceed the floor area by 10%. In the interests of clarity clear delineation / colour coding of floor plans indicating which of the apartments are considered by the applicant as dual / single aspect, single aspect north facing and which apartments exceeds the floor area by 10%.
9. A report that addresses issues of residential amenity, specifically with regards to potential overlooking, overshadowing and overbearing. The report shall include full and complete drawings including levels and cross-sections showing the relationship between the proposed blocks within the scheme and to adjacent residential development.



10. A Daylight and Shadow Impact Assessment of the proposed development, specifically with regard to:
  - (i) Impact upon adequate daylight and sunlight for individual units, public open space, courtyards, communal areas, private amenity spaces and balconies.
  - (ii) Impact to neighbouring properties devoid of proposed and existing landscaping and trees.
  - (iii) Impact to future residents and Block C, in particular, regard being had to mature trees to the north of the site, in private ownership, outside of the control of the applicant.
  
11. Clarification at application stage regarding connection to water and drainage infrastructure having regard to the Irish Water submission, submitted to the Board on the 21.10.2021.
  
12. A full response to matters raised within the PA Opinion submitted to ABP on the 22.10.2021.
  
13. A life cycle report shall be submitted in accordance with section 6.13 of the Sustainable Urban housing: Design Standards for New Apartments (2020). The report should have regard to the long-term management and maintenance of the proposed development. The applicant should consider the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, child friendly spaces, pathways, and all boundary treatments. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development.
  
14. Where an EIAR is not being submitted the applicant should submit all necessary information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 for the purposes of EIAR screening.



15. An up to date Ecological Impact Assessment, inclusive of a Bird and Bat Survey.
16. A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.
17. Site Specific Construction and Demolition Waste Management Plan.
18. Details of public lighting.

Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended:

1. Irish Water
2. Heritage Council
3. National Transport Authority (NTA)
4. Transport Infrastructure Ireland (TII)
5. Department of Culture Heritage and the Gaeltacht
6. South Dublin County Childcare Committee.



## Appendix B – Response to Planning Authority’s Opinion

SDCC Comment	Response
<b>Summary of Key Issues</b>	
Land-Use Mix and Rationale	
<p>There is a need to provide an appropriate mix, range and type of uses in Local Centres, including retail, community, recreational, medical and childcare uses, at a scale that caters predominantly for a local level catchment (Policy UC5).</p> <p>The Planning Authority welcomes the provision of residential development on upper floors at this location, and ground floor units facing onto the access route to Mount Carmel Park. However, the development should include a greater share of other uses at ground level, such as retail, community, recreational, or medical. The site is well situated to take advantage of the natural desire line for pedestrian accessing the Dodder Valley via Mount Carmel Park, for uses such as café, etc.</p> <p>The present proposal compresses commercial activity into a small corner of the site, around the vehicular access. SDCC does not support the amount, size and configuration of the units (the majority of commercial space is provided below ground).</p>	<p>The proposed scheme now comprises a greater mix of non-residential uses including; a café, office, medical unit, betting office, barber shop, at ground floor level along the full building interface with Firhouse Road and a crèche at lower ground floor level (Level B1) to the northeast corner of the site (influenced by site topography).</p> <p>The proposed café has been relocated to the south-east corner of Block 02 and will take advantage of the natural desire line at this location through to the Dodder Valley Park, as suggested by the Local Authority.</p> <p>Further details on the mix of uses and their location is contained within the <i>Statement of Response</i> and the <i>Architectural Design Statement</i> produced by OMP Architects.</p>
Building Height and Material Contravention of the County Development Plan	
<p>The proposed development has a height of 4-5 storeys above basement/undercroft and contravenes the County Development Plan requirement for development of more than 2 storeys to be located 35m away from existing low-rise development. The Planning Authority supports 3-5 storey development here in principle, but considers that the transition in height to the north-east should be gentler, i.e. the step down to Mount Carmel park should be to a height of 3 storeys above the ground there, and the step up to 5 storeys (perceived as 6 at that location) should be gentler.</p>	<p>The building heights have been revised in light of the comments provided by the Local Authority. The development now comprises a scheme of between 3 and 5 storeys over lower ground floor and basement level.</p> <p>The design strategy has taken due regard to the concerns of the Local Authority and the proposed massing now results in a gentler transition in height from the northeast to the southeast corner at the junction of Firhouse Road and Mount Carmel Park. Further details on the design strategy is contained within the <i>Statement of Response</i> and the <i>Architectural Design Statement</i> produced by OMP Architects.</p>



<p>We also refer the Board to the guiding principle for height in a local centre contained in Policy UC6 of the County Development Plan:</p> <p><i>‘To encourage varied building heights in town, district, village, local and regeneration areas to support <b>compact urban form, sense of place, urban legibility and visual diversity</b> while maintaining a general restriction on the development of tall buildings adjacent to two-storey housing.’</i></p> <p><b>NB</b> – Some documents / images represent the step-down area to the north as being 3 storeys. Due to the change of levels on site, this would present as 3-storey.</p>	<p>It is acknowledged that building heights over and above two storeys are proposed within 35m of residential dwellings in Mount Carmel Park thereby contravening Housing (H) Policy 9 of the Current Development Plan. A <i>Material Contravening Statement</i> regarding this non-compliance is enclosed.</p>
<p>Proximity to Northern/North-West Boundary</p>	
<p>We note that the development is close to the northern / north-west boundaries, where there is dense mature tree cover. Block A is between 1 and 6 metres from the boundary; Block B is 3 – 3.5m from the boundary, and Block C is approx. 0.8m to 1.5m from the boundary. There are concerns both with regard to the need to prune these trees (in the Dodder High Amenity area) to accommodate such close development (and potential adverse impact on root spread due to proximity of new buildings), and also the likely sunlight and daylight challenge associated with building so close to these trees. The most serious concern relates to Block A at its closest point, and the long edge of Block B.</p>	<p>The setback distances between the proposed the development and the northern / north-west site boundaries have been increased where required.</p> <p>Some branches of 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. Taking the past management works into consideration, along with the minor extent of pruning works that are required, these works will not have an adverse impact on the health or visual appearance of the trees. The enclosed <i>Tree Survey, Arboricultural Impact Assessment &amp; Arboricultural Method Statement</i>, prepared by CM Arbor, concludes that the extent of the pruning works required is considered to be minor, and will not have an adverse impact on their health or visual appearance within the local area.</p> <p>Additionally, the daylight and sunlight assessment undertaken by OCSC Consulting Engineers took account of the trees on the neighbouring property and it was found that the residential amenity of the apartments units</p>



	facing these mature trees will not be compromised.
<b>Urban Design and Architectural Treatment</b>	
As a local centre close to an access to the Dodder Valley, and given also its location on the junction, it would be appropriate at this location to combine height with a modest visual landmark to signal the presence of the centre. However, there are concerns with the roof treatment of the 3 storey building onto Firhouse Road.	<p>The proposed buildings are both 5 storeys in height at their highest points. In Block 01 (previously Block A), this forms a modest landmark on the corner of the junction with Firhouse Road, and in response to the topography of the site, steps down so that the 5 storey height is maintained along the eastern elevation, then steps down a to 3 storeys at the point of closest proximity to the houses along Mount Carmel Park. The roof treatment has also been revisited by OMP Architects and Block 01 now includes contemporary flat roofs for the 3 to 4 storey a pitched roof for the 5 storey element.</p> <p>Further details on the design strategy are contained within the Statement of Response and the <i>Architectural Design Statement</i> produced by OMP Architects.</p>
<b>Layout and Alternatives</b>	
The proposed layout does not provide strong frontage to Firhouse Road or the public open space, instead the development is pushed out to the east, north and west boundaries of the site. SDCC recognises that the overall site boundaries changed during stage 1 and have again changed since, and that a previous design did show <i>some</i> frontage to the south, it is considered that the public open space to the front of the site could be directly addressed, even if this were a lower element to protect the space to the rear.	<p>The <i>Statement of Response</i>, prepared by OMP Architects, provides full details of the site layout and development strategy which has been subject to various revision on foot of the comments provided by the Local Authority.</p> <p>As discussed, the building front comprises primarily non-residential ‘active’ uses whilst the public open space is void of any car parking and is fully accessible via Firhouse and Mount Carmel Park local access road.</p>
<b>Visual Impact Assessment</b>	
There are protected views into the Dodder Valley from the north (as per County Development Plan maps). The applicant should provide photomontage/CGI images from this location. The other sensitive location is Mount Carmel Park and images should be provided of views from here. Views at street level should be provided to allow a fuller visual assessment of the scheme.	<p>The enclosed <i>Visual Impact Assessment (VIA)</i> includes views of the proposed the development from 12 No. viewpoints in the surrounding context, including those across the site to the north from Dodder Valley Park, the N81, Mount Carmel Park and Firhouse Road.</p> <p>The assessment founding that the proposed development will be largely screened by the</p>



	mature trees to the northeast. The proposed development also includes for a series of measures that will ensure a long term positive impact in areas in particular to the Firhouse Road.
<b>Public Realm</b>	
South Dublin County Council is promoting active travel across the county and produced the Active Travel Brochure in April 2021. The brochure identifies Cycle South Dublin Route 34, a route which will pass the site's eastern boundary. The final permission should make generous provision and width to provide safe cycle and pedestrian space within the red line of the scheme, designed in line with the NTA's Cycle Design Manual.	The Local Authority was contacted by the Transport Insights (Transport Engineers) in relation to the identified proposed cycle route on Mount Carmel Park. Local Authority advised that there is minimal works planned on Mount Carmel Park with works mainly comprising of resurfacing and road markings as part of the current phase of works which were due for completion in the first quarter of 2022. These works are understood to be as per the existing Dodder Greenway Part 8 Application Report (2017), (See the enclosed <i>Traffic and Transport Assessment</i> ). As such, there is no requirement for the provision of space for cycle/pedestrian infrastructure within the red line boundary of the scheme in order to accommodate the proposed cycle route.
<b>Japanese Knotweed</b>	
There is potential for Japanese Knotweed on the site. The applicant must provide a detailed Japanese Knotweed survey and, as necessary, an Invasive Species Management Plan. Given the potential for the plant to extend 7 metres beyond visible areas on the surface, the survey should note any knotweed on adjoining sites.	An invasive species survey was undertaken by Flynn Furney Environmental Consultants. The location of stands of Japanese knotweed ( <i>Fallopia japonica</i> ) and other high impact invasive species was a priority during the survey; none were recorded.  A number of non-invasive species were recorded within the site. Mitigation measures to control possible emergence of invasive species within the site is detailed in the enclosed <i>Invasive Species Survey Report</i> .
<b>Natural SUDs</b>	
The development should incorporate natural SUDs features, particularly at its rear boundaries or as part of amenity space.	Proposed SuDS include: <ul style="list-style-type: none"> <li>• Green/Blue roofs to all flat roof areas.</li> <li>• Blue roof system to the Basement Podium at ground floor level.</li> </ul>



	<ul style="list-style-type: none"> <li>• Infiltration Trenches within the public realm areas to the south and east of the building.</li> <li>• Tree pits and raingarden areas to the public realm areas.</li> <li>• Permeable surface paving and subsurface attenuation layer.</li> </ul> <p>Full details on the location of the SuDs features can be found in the enclosed engineering and landscaping packs.</p>
<b>Principle of development</b>	
Zoning, land-use and council policy	
<p>The Planning Authority welcomes the provision of residential development on upper floors at this location, and ground floor units facing onto the access route to Mount Carmel Park. However, the development should include a greater share of other uses at ground level, such as retail, community, recreational, or medical. These uses should be public facing and based primarily at ground level, but extensive use of basements in a new development is not preferred or recommended. The site is well situated to take advantage of the natural desire line for pedestrian accessing the Dodder Valley via Mount Carmel Park, for uses such as café use. South Dublin County Council does not support currently proposed level of provision or layout of the above commercial units.</p> <p><b>It is the opinion of South Dublin County Council that the proposed development would not provide an appropriate amount and mix of uses to serve a local catchment, and that the layout of commercial uses is inappropriate. Notwithstanding that a change in approach at ground level is required, the uses currently proposed are each permissible on the site.</b></p>	<p>As discussed above, the comments of the Local Authority have been fully considered and the proposed scheme now comprises a greater mix of non-residential uses at ground floor level across the subject site.</p>
<b>Design, Character, Visual Impact and Layout</b>	
Density	
<p>The calculated density is 232 dwellings/ha. As indicated above, the key factor in determining appropriate density according to the Apartment Guidelines 2020 is connectivity and accessibility.</p>	<p>The proposed development has decreased from 232 dwellings per hectare to 217 units per hectare, which is considered a sustainable density for sites within 'Intermediate Urban</p>



<p>This is not a centrally located site and is somewhat detached from Tallaght by the Dodder Valley. The bus stop on the site is served by the 75 and 75A buses between Tallaght and Dun Laoghaire, which have peak time frequencies of approx. 20 minutes. The 15 bus on Woodstown is a 15-minute walk, and has a 10-minute frequency at peak times, connecting Woodstown to the city centre.</p> <p>Overall, it is not considered that the site meets the criteria for a 'central and/or accessible urban location'. The main concern in relation to density at this site is design based, in terms of visual impact, sunlight and daylight, and mix of units etc.</p> <p><b>The Planning Authority is not opposed to the proposed density in principle, but it is considered that a reduction in units would arise from design changes that better reflect the following constraints:</b></p> <ul style="list-style-type: none"> <li>- Transition in height to low-rise development in Mount Carmel Park;</li> <li>- Need to provide appropriate mix in a Local Centre at ground level;</li> <li>- Need to rationalise frontage to Firhouse Road;</li> <li>- Need for adequate lighting of communal open space</li> <li>- impact on trees on north west boundary.</li> </ul> <p>A reduction in density may accord with the guidance in the Apartment Guidelines 2020.</p>	<p>Locations' having regard to the site's location within Dublin's Metropolitan Consolidation Area.</p> <p>The design changes which have occurred since the Pre-Application SHD scheme includes:</p> <ul style="list-style-type: none"> <li>• decrease in apartments units proposed from 103 No. to 100 No.</li> <li>• Greater transition in height proposed for Block 01 (previously Block A) from a proposed 3 to 5 storey building adjacent to Mount Carmel Park.</li> <li>• Additional non-residential uses at ground floor level fronting Firhouse Road.</li> <li>• Relocation of all car parking to basement levels.</li> <li>• Increased setback of the proposal from the northern and western site boundaries.</li> </ul> <p>The enclosed architectural <i>Statement of Response</i>, prepared by OMP Architects, demonstrates how the proposed design strategy has evolved since the Pre-Application Consultation process.</p>
<p>Height</p>	
<p>The ground levels differ across the site. Above ground, the development is 4-5 storeys. Level 'B1' on the drawings is accessed at grade in Block A at the north of the site, but is a basement level under Block C.</p> <p>Taking ground level as the lowest across the site, the development would read as being 4-6 storeys in height. Taking as a benchmark the highest ground level, the development would read as being 3-5 storeys in height.</p>	<p>The building heights have been revised in light of the comments provided by the Local Authority. The proposed height of 5 storeys steps down to 4 storeys and then 3-storeys (with fourth storey setback) at the north-east corner providing a gentler, longer transition to taller elements at the southeast corner.</p> <p>The design strategy has taken due regard to the concerns of the Local Authority and the proposed massing now results in a gentler</p>



<p>The provision of 5-storey development is acceptable as per Policy H9, Objective 4. There is, however, a need to provide for a transition in height to mitigate impact on Mount Carmel Park. Mount Carmel Park is an established residential estate of 2- storey housing, which will be directly addressed by the proposed development.</p> <p>The proposed development currently steps down two stories to the north, where a communal roof terrace is provided. Due to the changing ground levels, this is a 4- storey element which would directly face 2-storey housing.</p> <p><b>It is the opinion of South Dublin County Council that the proposed height of 5 storeys, while acceptable, requires a step down to 3-storeys at the north-east corner (currently 4 storeys), and a gentler, longer transition to taller elements.</b></p> <p>Taller elements should be located away from the north-east corner of the site.</p>	<p>transition in height from the northeast to the southeast corner at the junction of Firhouse Road and Mount Carmel Park Further details on the design strategy is contained within the <i>Statement of Response</i> and the <i>Architectural Design Statement</i>, prepared by OMP Architects.</p>
<p>Visual Impact</p>	
<p>It is considered that the proposed development could provide a gentler transition in height down to Mount Carmel Park. Comments on the elevational and material treatment below develop this further.</p> <p>There are protected views of the Dodder Valley from the N81, facing south towards the site. <b>It is the opinion of South Dublin County Council that the applicant should provide CGI / photomontages from along this road, to confirm that the protected views, which also take in the vista of the Dublin Mountains, are not interrupted.</b> The final application will be assessed against Policy HCL8 of the South Dublin County Development Plan 2016 - 2022 and the South Dublin County Council Landscape Character Assessment (2015).</p>	<p>The enclosed photomontages booklet includes view of the proposed development from 12 No. viewpoints in the surrounding context, including those across the site from Dodder Valley Park, the N81 (vista of the Dublin Mountains) to the northwest, Mount Carmel Park and Firhouse Road.</p> <p>The VIA assessment found that the proposed development, due to its modest maximum height of 5 storeys, will be largely screened by the presence of the mature trees to the northwest. The proposed development also includes for a series of measures that will ensure a long term positive impact in the immediate area, particularly along Firhouse Road.</p> <p>The <i>Architectural Design Statement</i>, prepared by OMP Architects, also includes a series of CGI's which show the proposed development from street level.</p>



Layout	
<p>Though the Planning Authority supports a layout that maximises sunlight penetration to the communal open space, it is also considered important to address the public open space on Firhouse Road with commercial/mixed use frontage.</p> <p>As discussed above, the placement and provision of commercial units is considered to be problematic. The layout provides that the majority of commercial space will be provided at basement level in 3 split-level units. These units are located to the southwest of the site, either side of the basement/undercroft car park entrance. It is considered that a natural desire line in this location is the link to the Dodder Valley, running up Mount Carmel Park. A café on the south-east corner of Block A may be more appropriate.</p> <p>Development is very close to the north and north-western boundaries. This boundary separates the built-up area from the high amenity Dodder Valley, which is heavily covered with trees and hedges in this area, and is also an area of geological interest. The Planning Authority's main concern regarding this layout is the interaction with mature trees on the edge of the site and in the Dodder valley High Amenity area. In the case of Block A, trees will be need to be cut back (and or compromised due to root damage from new buildings in close proximity) not just for construction works but for the permanent location of the proposed building. The applicant has also proposed to retain the boundary wall here as a natural root barrier, although root protection areas appear to enter the site. The other consideration here is that the trees may block light into some of the proposed units.</p> <p><u>Boundaries and Interaction with adjoining Roads/Development</u></p> <p>The proposed development may be better served with the provision of a larger pedestrian footpath to Firhouse Road, separating the public open space from the road and serving as a mixed</p>	<p>The <i>Statement of Response</i>, prepared by OMP Architects, provides full details of the site layout and development strategy which has been subject to various revision on foot of the comments provided by the Local Authority.</p> <p>As discussed, some branches of 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. Taking the past management works into consideration, along with the minor extent of pruning works that are required, these works will not have an adverse impact on the health or visual appearance of the trees. The enclosed <i>Tree Survey, Arboricultural Impact Assessment &amp; Arboricultural Method Statement</i>, prepared by CM Arbor, concludes that the extent of the pruning works required are considered to be minor, and will not have an adverse impact on their health or visual appearance within the local area.</p> <p>Additionally, the daylight sunlight assessment undertaken by OCSC Consulting Engineers took into consideration the trees on the neighbouring property and it was found that the residential amenity of the apartments units facing these mature trees will not be compromised.</p> <p>The proposed development incorporates a 3m footpath along the southern building elevations. The Local Authority advised that there is minimal works planned on Mount Carmel Park with works mainly comprising of resurfacing and road markings. As such, there is no requirement for the provision of space for cycle/pedestrian infrastructure within the red line boundary of the scheme in order to accommodate the proposed cycle route.</p> <p>The enclosed <i>Statement of Response</i> and an <i>Architectural Design Statement</i>, prepared by</p>



modal draw into and along the site. To the east, a set-back from the street should be provided to support the provision of cycling infrastructure as per the 'Cycle South Dublin' programme published in April 2021:

South Dublin County Council is promoting active travel across the county and produced the Active Travel Brochure in April 2021. The brochure identifies Cycle South Dublin Route 34, a route which will pass the site's eastern boundary.

The Planning Authority also has concerns relating to the provision of a roof terrace to the north-east, which will directly address 2-storey private houses.

#### Conclusion on Layout

Overall, it is considered that there are a number of issues with the layout. The applicant's design statement does not provide a commentary on alternative layouts, though it is known that the layout changed between Stage 1 meetings.

The proposed development is also overprovided with single aspect units, accessed internally along linear corridors. Particularly along Mount Carmel Park, it is considered that the layout of ground floor units should favour own-door units with front terraces, to better integrate into the existing development.'

**It is the opinion of South Dublin County Council that it may be preferable to improve the proposed layout by:**

- **Increasing separation distance to the north and north-west boundary;**
- **Relocation and reconfiguration of commercial units to provide these uses on ground level, and to address the public open space along the long edge with Block A and the podium access; and**
- **Increasing the ratio of such units to residential;**

OMP Architects, addresses any potential overlooking issues.

The proposed duplex apartments along Mount Carmel Park each have own door access and front terraces private amenity space.

The proposed layout has been amended to coincide with the Local Authorities comments, for example:

- The setback distances between the proposed the development and the northern / north-west site boundaries have been increased where required.
- The non-residential elements have been reconfigured and relocated to provide 'active' uses at ground floor level. The proposed café has been relocated to the south-east corner of Block 01 and take advantage of the natural desire line at this location through to the Dodder Valley Park, as suggested by the Local Authority. Access to the podium from public open space will be strictly for residents of the proposed scheme.
- The gross floor area of the non-residential units has increased to c. 355 sq m alongside a generously sized public open space of c. 1,347 sq m.
- 50% of the residential units are now dual aspect.
- The roof terraces proposed along Mount Carmel Park include appropriate screening to ensure adjacent residential amenity is not unduly impacted.



<ul style="list-style-type: none"> <li>- <b>Increase number of dual aspect units; and</b></li> <li>- <b>providing own-door units on Mount Carmel Park.</b></li> </ul> <p>In general, we would like to see potential alternative layouts and the rationale for the selection of the final approach, or the discounting of other approaches.</p> <p>The applicant should address the issue of the roof terrace to the north-east and its relationship with housing there. The roof terrace may need to be taken in from the roof edge at this location.</p>	
<p>Elevational and Material Treatment</p>	
<p>The proposed design does not adequately mitigate the proposed sharp increase in heights (as compared to the status quo in the local area). A gentler design would provide for a set-back on the top level, and other setbacks may also be preferable at various levels. Instead, the proposed development steps out from and over ground floor accommodation, emphasising its bulk and mass. At roof level, a very shallow pitched roof is provided with short chimney features. The pitch of the roof drops below ceiling level on the top floor in an attempt to break up the top floor façade into dormer features. The resulting scale of these features however would undermine this attempt, at it is considered that the top floor will read as being a continuation of the elevation below. A genuine set back, or steeper pitched roof (as shown in the leftmost example of the Architect’s design statement, page 15), may better mitigate the impact of height here.</p> <p>There is a material shift midway up some of the blocks, from red brick to zinc, though this is not a constant feature around the development. This aspect of the design could be more simply done, with a consistent change in materials either in vertical section or at a certain level around the development. Similarly, white stone courses add detail to the façades but not in a consistent manner</p>	<p>Detailed justification for the proposed materials and finishes is included in the <i>Architectural Design Statement</i>. A section on the ‘Elevation and Material Strategy’ also forms part of the architectural <i>Statement of Response</i>, prepared by OMP Architects.</p>



There is no explanation in the architectural documentation regarding the unusual roof treatment of Block C. The scale and height of this treatment is considered to be inappropriate, and it is not clear what the proposed shape is supposed to be referencing in the local area. As a local centre, a civic architectural approach and modest landmark may be appropriate, but the roof treatment of Block C needs to be rethought.

**It is the opinion of South Dublin County Council that the material and elevational treatment of the development could be improved to simplify the facades and the roof profile of the 3 storey building onto Firhouse Road and mitigate the impact of the proposed height. A gentler approach to height would be preferred by way of set backs or genuine combination of pitched roof and dormers.**

**Residential Amenity**

The applicant has provided a Housing Quality Assessment, which shows compliance with minimum unit and room sizes (subject to 5% variations in certain instances) as per the Apartment Guidelines (2020).

The proposed development includes 14 2-bed, 3-person units. These units are not provided for in an SPPR of the Apartment guidelines and are not provided for in the South Dublin County Development Plan 2016 - 2022. The minimum unit size for a 2- bed apartment under the County Development Plan is 72m<sup>2</sup>. The provision of 14 units (13%) of the development at a significant variance to both the County Development Plan and SPPR 3 is not acceptable to the Planning Authority. The shortfall in unit size is as high as 12% in many cases.

*We would invite the Board to comment on their interpretation of section 3.8*

'Safeguarding Higher Standards', as to whether units which do not meet statutory local guidance, but do meet non-statutory national guidance, should be included in calculations as

The enclosed *Housing Quality Assessment* (HQA) confirms that 10% of the total 100 No. of units in the scheme comprise 2 bedroom, 3 person, units. A 'Safeguarding Higher Standards' plan (Dwg. No. 20022-OMP-ZZ-ZZ-DR-A-6002) showing the units which exceed the minimum floor area by 10% are also enclosed and discussed in the enclosed *Statement of Response*, prepared by OMP Architects.



<p>to overall compliance with section 3.8 of the guidelines.’</p> <p><b>It is the opinion of South Dublin County Council that the provision of 14 No. “2-bed, 3-person” units in the development is contrary to the South Dublin County Development Plan 2016 - 2022, is not provided for in a Specific Planning Policy Requirement, and distorts the overall compliance of the scheme with section 3.8 ‘Safeguarding Higher Standards’ of the Apartment Guidelines (2020).</b></p>	
<p>Aspect</p>	
<p>The applicant states that 46% of the units are dual aspect. As stated under ‘Density’, this is not considered to be central site, and in particular it is not considered to have the constraints of an infill development in a central urban location. The development is provided predominantly with single aspect units, access internally. It is considered that no particular constraints prevent the proposed development from achieving 50% dual aspect on this site.</p> <p><b>It is the opinion of South Dublin County Council the proposed development should be provided with at least 50% dual aspect units.</b></p>	<p>The configuration of the proposed apartment blocks, the internal layouts of apartment units and the stepping of building heights have been considered in terms of maximising dual aspect units, providing a total of 50 No. dual aspect units across the scheme (50%)</p> <p>No north-facing single-aspect units are proposed.</p> <p>OMP Architects have prepared a drawing (Dwg. 20022-OMP-ZZ-ZZ-DR-A-6001) which identifies all single and dual aspect units across the proposed scheme.</p>
<p>Sunlight/Daylight and Overshadowing</p>	
<p>The applicant has provided a Sunlight and Daylight Report. The report accounts for the presence of trees to the north-west. The report assesses the development for average daylight factor and sunlight cover of open spaces and measures the impact of the development on surrounding buildings and spaces through average daylight factor, vertical sky component and the 25 degrees test.</p> <p>Of the 260 No. rooms assessed, 5 do not meet minimum requirements for Average Daylight Factor; some of these shortcomings are severe in individual rooms. This should be examined by the applicant to improve the layout.</p> <p>The report shows that there will be an impact on a window of one house on 1 Mount Carmel Park,</p>	<p>Upon comments provided by SDCC, the building height strategy was revisited and a gentler transition in height is proposed along Mount Carmel Park.</p> <p>Further daylight and sunlight analysis was undertaken by OCSC Consulting Engineers. In summary, the enclosed <i>Daylight &amp; Sunlight Report</i> concludes the following:</p> <ul style="list-style-type: none"> <li>• excellent levels of internal daylight are achieved across the entire proposed development, with a predicted compliance rate of 100% across the proposed development, against both BS 8206 and EN 17037.</li> </ul>



<p>diminishing the light reception in that property. Given the scale and context of the development, it is surprising that any properties would be affected. SDCC is encouraging a gentler transition of height here.</p>	<ul style="list-style-type: none"> <li>• excellent levels of sunlight will be experienced across the proposed development. The communal amenity spaces provided exceed the BRE guidelines for sunlight on the test day of 21st of March.</li> <li>• The annual probable sunlight hours assessment has shown that 73% of windows across the proposed development will achieve the recommended APSH values stated in the BRE Guidelines, while 78% of windows will achieve the recommended values during the winter months, when sunlight is more valuable. The vast majority of windows comply with the direct sunlight recommendations of EN 17037.</li> <li>• In terms of potential impact on neighbouring properties, the 25° line and the Vertical Sky Component (VSC) analysis have shown that a negligible impact will be perceived by the surrounding properties.</li> <li>• The overshadowing analysis has shown that there will be little overshadowing due to the proposed development, aside from on 4 p.m. in March, and 2 p.m. onwards in December.</li> </ul> <p>We therefore conclude that a detailed and robust assessment has been undertaken in respect of potential impact in relation to daylight and sunlight. We further conclude that it has been demonstrated that the proposed development will not give rise to unacceptable impact upon the receiving environment in this regard. Refer to the <i>Daylight &amp; Sunlight Report</i> for full details of the assessment and results.</p>
<p>Other Uses</p>	
<p>Of some concern is that the creche drop-off area is underground and the applicant may wish to re-visit this.</p> <p>The siting and scale of the commercial units requires improvement.</p>	<p>As discussed, the siting and scale of the proposed non-residential units have been amended.</p> <p>Drop-off/pick-up for the crèche will be located within the basement car park level at a location from which the creche can be easily accessed.</p>



<p>In relation to the principle of a betting office at the site, the applicant should provide details of any existing operations in the area, in order that the proposed use can be assessed under Section 5.9.0 of the South Dublin County Development Plan 2016 - 2022, under which off-licences and betting offices should not be excessively concentrated.</p>	<p>The site is located within the 'Local Centre' land zoning objectives whereby 'betting office' is a 'permitted in principle' and use. The zoning supports the proposed use subject to other relevant policies and objectives outlined in the <i>South Dublin County Council Development Plan 2016 - 2022</i> and the <i>Draft South Dublin County Development Plan 2022-2028</i>.</p> <p>In our view, it is a reasonable objective, and the proposed type of use (betting office) should be carefully assessed, particularly if there is potential for a 'proliferation' of betting offices as a direct result of the proposal. Importantly, we note that the application seeks for an existing betting office use to cease operating and to be replaced by a new betting office, albeit in a new building and size on site. Therefore, the proposal will <u>not</u> increase the number of betting offices within the area and proliferation is explicitly avoided.</p> <p>Further to this, the betting office will also offer to maximise passive and active surveillance of the street frontage and open space alongside the other non-residential uses at ground floor into the evening.</p>
<p>Public Realm</p>	
<p>A greater level of detail in relation to landscaping, the public realm and open space is required:</p> <ul style="list-style-type: none"> <li>• Details of play provision to be provided within the development</li> <li>• overshadowing of the courtyard open space between Blocks A and B –</li> <li>• A microclimate assessment shall be provided for all open spaces.</li> <li>• There is a need for a strong and legible hierarchy in the open spaces provided as part of this proposed development, with different types of open space provided for in accordance with policies H12, objective 2 of the CDP 2016-2022. The layout needs to clarify the type of open space and access routes (defined as public or communal for residents) and</li> </ul>	<p>The Design Team we have designed a safe, secure, and enjoyable public realm. High quality materials and generous amenity planting help create an instantly attractive and welcoming public open space.</p> <p>The activation of the south facing public amenity open space has increased through the reconfiguration and relocation of the non-residential units. The proposed development now includes 'own door' residential units along Mount Carmel Park which also activate this street frontage up to the Dodder Valley Park. The relocation of the attenuation tank and car parking from the area to the front (south/southeast) of the site has allowed for enhanced public realm which will include significant tree planting.</p>



<p>shall be designed accordingly. The applicant shall provide further details in this regard.</p> <ul style="list-style-type: none"> <li>• All access points are required to have active frontage throughout and passive surveillance to provide welcoming functioning access routes.</li> <li>• A Universal Accessibility Map shall be submitted to demonstrate that the development is inclusive to people of all abilities. This shall be accompanied with a movement strategy plan for cyclists and pedestrians.</li> </ul> <p>The report also notes the potential presence of Japanese knotweed on the site and seeks that this be addressed by the applicant by way of a knotweed survey.</p>	<p>The newly proposed 3m width pedestrian route and the prioritisation of inclusive design principles and wayfinding measures have resulted in the site opening positively for nature-based solutions, views, aspect, wayfinding, and playful features, including the retention of the key mature trees in the adjacent lands to the north and west.</p> <p>This application is accompanied by a full suite of landscaping drawings and a landscape design rational, prepared by Studio Aula, which includes full details on all play space for young children and teenagers.</p> <p>The <i>Daylight &amp; Sunlight Report</i> confirms that all communal amenity spaces provided will exceed the BRE guidelines for sunlight on the test day of 21<sup>st</sup> March.</p> <p>Given the modest scale of the proposed development of between 3 and 5 storeys, in our opinion, it is not considered necessary to produce a full wind assessment in this instance. The communal open space at podium and roof levels includes tree planting, hedging and modular pergolas which will ensure these spaces are enjoyable and not subject to undesirable wind impacts. Notwithstanding this, a <i>Daylight &amp; Sunlight Report</i> is enclosed which demonstrates that all outdoor amenity spaces have been afforded excellent levels of sunlight throughout the day throughout the year.</p> <p>Access points across the proposed development are shown on the individual floor plan drawings. Active street frontages and passive surveillance are guaranteed across the proposed scheme.</p> <p>The Architectural Design Statement demonstrates that the development is inclusive to people of all abilities.</p>
<p>Access, Transport and Parking</p>	
<p>The Roads Department has provided a report stating no objections to the development and raising no issues with the proposal. The report is provided in the appendices.</p>	<p>The cycle parking requirement for the proposed development as per the Apartment Guidelines are set out in the enclosed <i>Traffic and Transport Assessment</i> Report, prepared by Transport</p>



<p>The applicant has provided bicycle parking as per the County Development Plan rather than the higher standard contained in the Apartment Guidelines (2020). This is combined with a low provision of car parking spaces (0.6 per unit).</p> <p>Given the residential parking ratio of 0.63, and the connectivity and transport options at the site, <b>it is the opinion of South Dublin County Council that it would be appropriate to provide a higher cycle parking ratio to residential units, in line with the 2020 Apartment Guidelines.</b></p>	<p>Insights. The proposed provision of cycle parking for the residential portion of the development now conforms with these requirements.</p> <p>The number of bicycle parking spaces has significantly increased from 196 No. to 270 No. in total.</p>
<p>Water Services and Drainage</p>	
<p>1. The proposed diversion of the existing 525mm surface water sewer is not acceptable as there is inadequate cover provided over the proposed diverted pipe i.e. less than 750mm. The Greater Dublin Regional Code of Practice for Drainage Works states that “The recommended minimum depth of cover over a main pipeline is 1.2m. If that cannot be achieved, the pipes shall be fully surrounded in 150mm thick concrete with an absolute minimum depth of cover of 750mm”. The applicant is required to submit a revised diversion design for this pipe which fully complies with the above. Bends shall be minimised and shall be no greater than 90 degrees. The applicant shall also submit revised calculations which shows that the proposed diversion will not decrease the capacity of this pipe.</p>	<p>The existing surface water sewer which runs parallel with the rear boundary through the site of the proposed development is not 525mm, but a 300mm diameter – as investigated by South Dublin County Council.</p> <p>The proposed diversion of this sewer is to be provided on Firhouse Road and along Mount Carmel Park. The tie-in to the existing line on Mount Carmel Park needs to be provided at the existing invert level. Full concrete surround is proposed where 1.2m cover is not achievable with an absolute minimum of 0.75m cover over the pipe.</p> <p>Bends of no greater than 45 degrees are proposed.</p> <p>Full details can be found in the enclosed <i>Water Services Report</i> and the accompanying engineering drawings, prepared by PHM Consulting.</p>
<p>2. The applicant is required to submit a revised surface water drainage design report clearly showing a breakdown of all proposed surface types and surface areas (inm2) as well as corresponding run off coefficients applied to each surface type. This is required for Water Services to fully assess surface water attenuation proposals.</p>	<p>Individual surface areas and roofs, podium, open space areas are provided in the appended calculations and on the proposed drainage drawing. Cv’s area also identified. Co-efficient are generally 0.95 for Roofs and 0.9 for paved areas.</p> <p>Full details can be found in the enclosed <i>Water Services Report</i> and the accompanying</p>



	<p>engineering drawings, prepared by PHM Consulting.</p>
<p>3. Water Services have concerns regarding the proximity of the underground surface water attenuation system in relation the foundations on the south side of the proposed building. The applicant shall submit a drawing showing a cross section detail of all proposed attenuation systems which also highlights the distance between the underground attenuation system and adjacent building foundations. The applicant shall demonstrate how surface water attenuating systems are designed to ensure that surrounding building foundations are not undermined or adversely affected over time.</p>	<p>The original attenuation storage has been removed given the increased level of natural SuDS incorporated into the design.</p> <p>A minimal level of storage is now required in the form of an underground tank at the north eastern corner of the building and will be within the ownership lands of the development. This tank will be of reinforced concrete, which will be constructed as part of the main RC structure of the basement.</p> <p>Full details can be found in the enclosed <i>Water Services Report</i> and the accompanying engineering drawings, prepared by PHM Consulting.</p>
<p>4. The proposed underground geocellular attenuation system is located in an area to be taken in charge by the Council. The applicant shall therefore change proposed underground attenuation system to an “Arch type” system as the council only take these systems in charge due to maintenance reasons.</p>	<p>This geocellular attenuation system is no longer necessary given the redesigned surface water management train for the development.</p> <p>Full details can be found in the enclosed <i>Water Services Report</i> and the accompanying engineering drawings, prepared by PHM Consulting.</p>
<p>5. Water services welcome all proposed Sustainable Drainage Systems (SuDS) proposed such as blue roofs, tree pits and permeable paving. The applicant is requested to investigate whether further SuDS can be incorporated into the surface water drainage design such as but not limited to the following:</p> <ul style="list-style-type: none"> <li>• Swales</li> <li>• Further Green roof/Blue roof coverage across buildings</li> <li>• Detention basins</li> <li>• Filter Drains</li> <li>• Rain Water Harvesting</li> </ul> <p>Submit a SuDS plan drawing and cross section details of all proposed SuDS (Sustainable Drainage Systems) features</p>	<p>Proposed SuDS include:</p> <ul style="list-style-type: none"> <li>• Green/Blue roofs to all flat roof areas.</li> <li>• Blue roof system to the Basement Podium at ground floor level.</li> <li>• Infiltration Trenches within the public realm areas to the south and east of the building.</li> <li>• Tree pits and raingarden areas to the public realm areas.</li> <li>• Permeable surface paving and subsurface attenuation layer.</li> </ul> <p>Maximum discharge rate of 1.5 l/s noted on drainage layout at the outfall Hydrobrake manhole.</p>



<p>across the site at full planning application stage. The applicant shall also highlight the proposed surface water maximum discharge rate of 1.5L/S on the drainage layout drawing.</p>	<p>Full details can be found in the enclosed <i>Water Services Report</i> and the accompanying engineering drawings, prepared by PHM Consulting.</p>
<p>6. All drainage from basement level car parking shall pass through a Class 2 petrol interceptor and discharge to the foul drainage network in compliance with Greater Dublin Regional Code of Practice requirements. Submit a revised basement level drainage layout drawing which demonstrates this. The applicant is also required to demonstrate how basement drainage pumps will operate in the event of a power outage.</p>	<p>Class 2 PI provided within the basement car park with a pumped discharge to the Foul sewer on Mount Carmel Park.</p> <p>Back-up generator to be provided at ground floor level as part of the M&amp;E Installation.</p> <p>Full details can be found in the enclosed <i>Water Services Report</i> and the accompanying engineering drawings, prepared by PHM Consulting.</p>
<p>7. Submit a drawing showing that proposed petrol interceptors are relocated so that they are located upstream of proposed storm water attenuation systems. This will prevent oils and hydrocarbons entering storm water attenuation system thus making the attenuation system easier to maintain and clean. All proposed petrol interceptor/s shall be designed as in accordance with section 20 of the Greater Dublin regional Code of Practice for Drainage Works.</p>	<p>The proposed Class 1 PI is located upstream of the final attenuation. The level of individual SuDS provided along the Drainage train from roof surfaces to the final outfall will provided substantial removal of contaminates prior to reaching the PI. A review of the proposed systems in line with the SuDS Manual has been completed and deemed adequate without the need for a PI given the proposed usage of the catchment areas. A PI is still proposed as a final treatment provision.</p> <p>Full details can be found in the enclosed <i>Water Services Report</i> and the accompanying engineering drawings, prepared by PHM Consulting.</p>
<p><b>It is the opinion of South Dublin County Council that the issues raised in relation to Water Services should be addressed, that the applicant should consult with SDCC Water Services and agree arrangements prior to a final application being lodged.</b></p>	<p>PHM Consulting Engineers sent a response to South Dublin County Council's Water Services Department in relation to the items raised on the 29<sup>th</sup> October 2021. A reply was received from on the 3<sup>rd</sup> November 2021.</p>
<p>Ecological Impact</p>	
<p>The applicant has provided an Ecological Impact Report which is based on various surveys done on site between October 2020 and August 2021. The application documents note that some</p>	<p>An <i>Ecological Impact Report (EclA)</i>, <i>Bat Survey Report</i> and <i>Bird Survey Report</i>, prepared by Flynn Furney Environmental Consultants, are enclosed with this application.</p>



surveys were carried out at suboptimal times due to the timing of the application.

**It is the opinion of South Dublin County Council that, specifically in relation to birds, further surveys should be carried out at optimal times of the year prior to lodgement of a final application. The mitigation measures carried out in the ecological impact assessment should be carried out.**



## **Appendix C – ‘Open Space Areas’ report (incl. 5 year Landscape Management Schedule)**

Firhouse SHD  
Firhouse, Dublin 24

Response to ABP Opinion Point 7 -  
Responsibility for open space areas

31<sup>st</sup> May 2022

The purpose of this report is to respond to Point 7 of the ABP Opinion Dated February 2022 and set the responsibility for open space areas at Firhouse Inn, Firhouse, Dublin 24 (the “Property”).

## **Development Description**

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.

**Response to ABP Opinion**

***“Clarity in respect of what is designated as communal open space and what is designated as public open space. Whether it is intended that the public open space will be taken in charge and if not, a maintenance costs, access and liabilities report to set out responsibility for open space areas”.***

**Designation of Areas**

The designation of areas for the proposed development are detailed as follows;

Open Space Area Schedule		
Name	Level	Area
CRECHE PLAY SPACE	B1	216.3 m <sup>2</sup>
PUBLIC OPEN SPACE	B1	53.9 m <sup>2</sup>
PERIPHERAL AREA	B1	29 m <sup>2</sup>
PERIPHERAL AREA	B1	11.3 m <sup>2</sup>
PUBLIC OPEN SPACE	G2	1293.5 m <sup>2</sup>
PERIPHERAL AREA	G2	216.3 m <sup>2</sup>
PRIVATE COMMUNAL AMENITY SPACE	01	467.6 m <sup>2</sup>
PRIVATE COMMUNAL AMENITY SPACE	02	30.9 m <sup>2</sup>
PRIVATE COMMUNAL AMENITY SPACE	03	166.5 m <sup>2</sup>
PRIVATE COMMUNAL AMENITY SPACE	04	295.9 m <sup>2</sup>

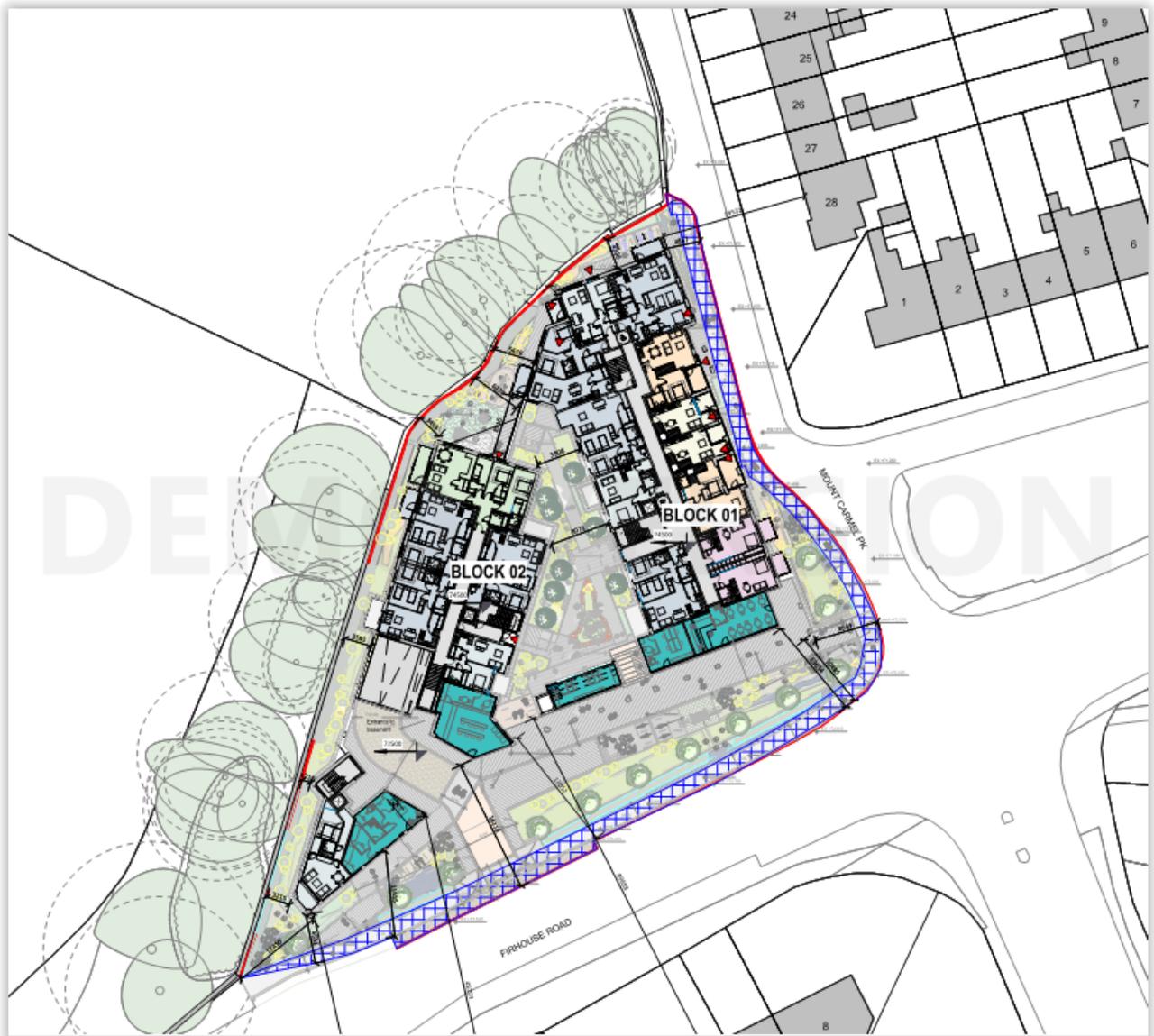
Public Open Space % of Site Area Schedule		
Name	Area	% Percentage of Site Area
PUBLIC OPEN SPACE	1347.4 m <sup>2</sup>	29.3
TOTAL SITE AREA	4605.6 m <sup>2</sup>	100

Quantum Open Space Areas

 PRIVATE COMMUNAL AMENITY SPACE

**Areas to be taken in charge**

The extent of the areas to be taken in charge are hatched blue below and consist of a two metre wide footpath along Firhouse Road and Mount Carmel Park.



**Maintenance Schedule/Specification for SDCC min. 18 month period post Practical Completion.**

5-year Landscape Management Schedule (previously printed & emailed).

**Maintenance Responsibility**

As per the CDP, and after the minimum SDCC 18-month period of responsibility under the main contract, all maintenance responsibilities will then transfer to the management company.

The estimated costs of landscape maintenance for the Public Open Space Area have been estimated by a Landscape Quantity Surveyor at €15,000 per annum and will be the responsibility of the management company of the scheme.



7 B1 - Quantum Open Space  
1:500



2 G2 - Quantum Open Space  
1:500



1 O1 - Quantum Open Space  
1:500



3 O2 - Quantum Open Space  
1:500



4 O3 - Quantum Open Space  
1:500



5 O4 - Quantum Open Space  
1:500



Open Space Area Schedule		
Name	Level	Area
CRECHE PLAY SPACE	B1	216.3 m <sup>2</sup>
PUBLIC OPEN SPACE	B1	53.9 m <sup>2</sup>
PERIPHERAL AREA	B1	29 m <sup>2</sup>
PERIPHERAL AREA	B1	11.3 m <sup>2</sup>
PUBLIC OPEN SPACE	G2	1293.5 m <sup>2</sup>
PERIPHERAL AREA	G2	218.3 m <sup>2</sup>
PRIVATE COMMUNAL AMENITY SPACE	O1	467.6 m <sup>2</sup>
PRIVATE COMMUNAL AMENITY SPACE	O2	30.9 m <sup>2</sup>
PRIVATE COMMUNAL AMENITY SPACE	O3	168.5 m <sup>2</sup>
PRIVATE COMMUNAL AMENITY SPACE	O4	295.9 m <sup>2</sup>

Public Open Space % of Site Area Schedule		
Name	Area	% Percentage of Site Area
PUBLIC OPEN SPACE	1347.4 m <sup>2</sup>	29.3
TOTAL SITE AREA	4605.6 m <sup>2</sup>	100

**Quantum Open Space Areas**

- PRIVATE COMMUNAL AMENITY SPACE

Revision Description	Date	Rev. No.	Issued by
ABP SHD Stage 3 Submission	24.05.2022	P01	OOK/KN

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**Project:** Firhouse  
**Location:** Firhouse Road, Firhouse, Dublin 24  
**Client:** Bluemont Developments (Firhouse) Limited

**Project No.:** 20022  
**Project Lead:** MH  
**Drawn By:** Author  
**Purpose:** Planning

**Scale @ A1:** 1 : 500  
**Date:** 24.05.2022  
**Revision:** P01  
**Status:** S0

**Drawing Title:** Open Space Plan  
**Drawing No.:** 20022-OMP-ZZ-ZZ-DR-A-6003

Source File: 20022-OMP-ZZ-ZZ-MS-A-0001.rvt







