

**SOUTH DUBLIN COUNTY COUNCIL**  
**PLANNING DEPARTMENT**  
**PRE-APPLICATION CONSULTATION REPORT FORM**

<b>Pre-Planning Ref. No.</b> <b>LRDPP008/25</b>	<b>ADVICE WITHOUT PREJUDICE</b>	Please note that advice or opinions offered at consultations is given in good faith and cannot prejudice the determination of a subsequent planning application in accordance with Section 247 of the Planning and Development Act		
<b>CONSULTATION:</b>		<b>Meeting</b>	<b>Email</b>	
<b>21/08/2025</b>		<b>X</b>		
Full address of subject site	No. 2 Firhouse Road and, the former Morton's The Firhouse Inn, Firhouse Road, Dublin 24.			
Name/s of Applicant/s and/or Agents Contact Details	Applicant: Bluemont Development (Firhouse) Ltd. Agent: Downey Planning			

**DESCRIPTION OF PROPOSAL**

*Large-Scale Residential Development (LRD) at No. 2 Firhouse Road and the former Morton's The Firhouse Inn, Firhouse Road, Dublin 24. The site is also bound by Mount Carmel Park to the east. The proposed development seeks amendments to the previously approved Large-Scale Residential Development (LRD), granted under Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24. The proposed amendments include a reduction in the footprint of the basement levels, reconfiguration of the floor plans, amendments to the housing mix and elevations of Block A and Block B, amended roof profile to provide a flat roof in lieu of the previously approved pitched roof design, provision of surface level parking, and relocation of substation. The revised application is seeking permission for a total of 83 no. housing units (100 no. units applied for and 78 no. units granted by An Bord Pleanála), providing an increase of 5 no. units granted under Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24. The proposal provides for 2 no. blocks ranging in height from 3- 4-storeys over basement levels comprising; 4 no. duplex units (2 no. 1-bedroom units, 1 no. 2-bedroom 3-person unit, and 1 no. 2-bedroom 4-person unit); and 79 no. apartment units (1 no. studio units, 52 no. 1-bedroom units, 8no. 2-bedroom 3-person units, and 18 no. 2-bedroom 4-person units). The granted development comprised (2 no. studio units, 33 no. 1-bed units; 7 no. 2-bed 3 person units, 30 no. 2-bed 4 person units, 2 no. 3-bed units, 4 no. duplex units (2 no. 1 bed units and 2 no. 2-bed 3 person units). The development will also provide for 463.3 sq. m. of commercial space as follows: - 1 no. office and 1 no. café located on the ground floor of Block 01. - 1 no. creche and associated play area to the rear of Block 01. - 1 no. barber between Block 01 and Block 02. - 1 no. bookmaker and medical consultancy, located on the ground floor of Block 02. The proposed development will also provide for 50 no. car parking spaces including accessible parking and Electric Vehicle parking across basement, lower ground floor levels, and surface car parking, 179 no. bicycle parking spaces; 5 no. motorbike parking spaces; landscaping, including communal open space and public open space and children's play spaces; SuDS measures; boundary treatment; public lighting; re-located ESB substation; plant and waste storage areas; associated signage details; all associated site and infrastructure works necessary to facilitate the development, with 1 no. pedestrian and cyclist access from Firhouse Road and 1no. pedestrian and cyclist access from Mount Carmel Park as granted under Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24.*

<b>Planning History</b>	<p><b>LRD24A/0001</b> (description summarised)</p> <p>Demolition of all existing structures on site, including the 2 storey building formally used as public house ancillary off-licence &amp; associated structures on the east of the site; a 2-storey building comprising an existing barber shop and betting office to the west of the site; single storey cottage building and associated structures in the centre of the site; and gated entrance from Mount Carmel Park. The proposal includes the construction of 100 no. residential units within 2 no. blocks ranging in height from 3-5 storeys (over lower ground floor and basement level).</p> <p>The Council <b>granted permission</b> for the proposal. However, this decision was subsequently appealed (ref. ABP-319568-24) to the An Coimisiún Pleanála, which upheld the Council's decision. The Commission's decision was <b>subject to conditions</b> requiring design modifications, as detailed in the final order.</p> <p><b>SHD3ABP-313777-22</b> (description summarised)</p> <p>Demolition of all existing structures on site (c. 1,326 sq m. The development with a total gross floor area of c. 11,638 sq m, will consist of 100 residential units arranged in 2 blocks (Blocks 01 and 02) ranging between 3 and 5 storeys in height.</p> <p>The application was <b>refused permission</b> by the Commission based on the following:</p> <p style="background-color: #f0f0f0; padding: 10px;"> Policy GI5 Objective 4 and Section 12.4.2 of the South Dublin County Development Plan 2022 - 2028 set out clear requirements for applications involving 2 or more residential units to include a Green Space Factor Worksheet to demonstrate compliance with scoring requirements in accordance with the 'South Dublin Green Space Factor Guidance Note'. The application did not include this information. It is considered that the proposed development would, therefore, materially contravene the Development Plan in relation to Green Space Factor requirements. This issue has not been addressed in the applicant's Material Contravention Statement (Appendix B addressing the Draft Policies of the Draft South Dublin County Development Plan 2022-2028) and, therefore, the application does not comply with the requirements of section 8(1)(a)(iv)(II) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended. The Commission, therefore, cannot invoke section 37(2)(b) of the Planning and Development Act 2000, as amended, and is precluded from granting permission. </p>
<b>Pre Planning History</b>	<ul style="list-style-type: none"> <li>Extensive pre-planning consultations took place for this site prior to the Council's decision on LRD24A/0001.</li> <li>On 07/05/2025, a S247 meeting was held between the Council and the applicant to discuss a series of proposed amendments to the approved scheme. These proposed amendments related predominately to the addition of 5 new apartments (and a subsequent increase in the height of the development) as well as a reduction in the footprint of the basement (Ref: LRDPP004/25)</li> <li>On 16/06/2025, a Stage 2 Meeting was held between the Council and the applicant under Ref: LRDOP006/25 to again discuss these design changes in more detail/ changes made on the foot of feedback received during the S247 Meeting.</li> </ul>

	<ul style="list-style-type: none"> <li>Following the release of the <i>Design Standards for Apartments, Guidelines for Planning Authorities, 2025</i>, by the Housing, Local Government and Heritage, in July 2025, and prior to the issuing of the Stage 2 Opinion by the Planning Authority, the applicant withdrew the Stage 2 Opinion Request made under Ref: LRDOP006/25 in order to revisit the design of the scheme in the context of the new Guidelines.</li> <li>On 12/08/2025, the applicant submitted this current S247 request (Ref: LRDPP008/25), which again seeks to introduce an additional 5 apartments, albeit within the footprint of the approved building envelope, a number of internal arrangements to the approved unit mix and elevations, a reduction in the footprint of the basement and the addition of surface car parking etc.</li> </ul>
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## **FEEDBACK/OBSERVATIONS OF PROPOSAL**

<b>Comment where relevant:</b>	<p><u>Proposal (as provided by applicant):</u></p> <p>A summary of key amendments to the scheme, including design modifications, changes to Block 2, and updates to landscaping, was provided by the applicant. The key changes were summarised as follows:</p> <ul style="list-style-type: none"> <li>• An increase in the total number of apartments from 78 to 83.</li> <li>• A change to the approved unit mix.</li> <li>• A series of minor revisions to the approved elevations.</li> <li>• A reduction in the footprint of the approved basement.</li> <li>• Amended roof profile to provide a flat roof in lieu of the previously approved pitched roof design</li> <li>• The introduction of surface level car parking to the front of the commercial units.</li> <li>• The applicant has advised that the amendments have been made to increase the viability of the scheme, with changes affecting Block 2 only. Design modifications were discussed.</li> <li>• Views were provided on the design approach for Block 2 and the overall scheme, including how the amendments address visual impact, streetscape character, and residential amenity.</li> </ul> <p><u>SDCC Comments:</u></p> <p><u>Planning Comments</u></p> <ul style="list-style-type: none"> <li>• <b>General:</b> The extent of amendments in relation to the scheme as permitted under LRD24A/0001 are noted.</li> <li>• <b>Density:</b> The density recommended for approval under LRD24A/0001 was supported based on several factors, one being the availability of car parking provided on site. Concerns are raised over the number of car parking spaces being lost and consequently the scheme's ability to support the proposed increase in density. Opportunities to retain as much as the previously approved car parking should be considered, particularly in light of the Commission's remarks in relation to density and public transport availability under LRD24A/0001. In summary, additional justification is required to support the proposed increase in density, demonstrating that the development is appropriate in terms of scale, character, impact on the surrounding area and car parking ratios.</li> <li>• <b>SUDS:</b> Opportunities for rooftop SuDS should be maximised.</li> </ul>
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- **Contiguous elevations:** These still show trees that no longer exist. These elevations should be updated to reflect the current on-site situation.
- **Design Statement:** Too much emphasis is placed on a scheme that was never assessed (or supported) by the Planning Authority in this document. Whilst the Planning Authority welcomes some discussion on the evolution of the proposed design changes, it should not dominate the full Design Statement. Preference instead is to see more emphasis on the comparison between the final scheme approved by the Commission and that currently proposed.
- **External Materials/ Design:** The approved scheme comprises of a range of high-quality finishes. When assessing the parent planning permission, significant weight was given to the role of the external finishes in helping to reduce the scale, mass and bulk of the proposal when viewed from the surrounding streetscape and how they would help the scheme assimilate within the site's more traditional two storey residential setting. Concerns are raised that some of the high-quality treatments have been lost through these latest changes, which in turn is likely to affect the scale and mass of the building when viewed from the adjoining area. Preference is to see the approved external treatments retained. Alternatively, strong justification should be provided for any significant deviation from these finishes.
- **Roof Profile:** Justification should be included in the final application as to why the change from the more traditional pitched roof profile is considered appropriate.

#### *Roads*

- **Car Parking Ratio:** The SDCC Roads Department raised significant concerns over the revised car parking rates being proposed, particularly in light of the limited public transport available in the area and the proposed increase in apartment numbers. It was advised that any amendment application should seek to retain the rate approved under the parent planning application and that very strong justification would be required to support any reduction in car parking rates below the levels currently permitted on site.
- **Taking in Charge:** Any areas to be taken in charge should be clearly marked on a separate TIC plan.
- **Turning Circles:** Show tracking for all vehicles and turning circles for refuse vehicle on final plans.

#### *Landscape*

- **Landscape:** Welcome the proposals for constructed tree pits. We would like to see large root zones there so you can get mature trees there quickly. We recommend that you make use of the roof space for either brown roof or blue/green roof.

#### *Water Services*

- **Manhole Design:** As a reminder, concerns were originally raised in relation to the design of the cover level on the foul sewer to the east of the scheme. Advice has previously been provided to the applicant on the depth required. This design should be included
- **Contact Details:** Contact should be made with Brian Harkin in the Water Services Team to discuss this further.

	<p><b>Section 247(7) Determination</b></p> <p>The Planning Authority is satisfied, having compared the proposed development to the permitted development, that—</p> <ul style="list-style-type: none"> <li>a) the proposed development is substantially the same as the permitted development, and</li> <li>b) the nature, scale and effect of any alterations to the permitted development are not such that require the consultation process to be repeated.</li> </ul> <p>Notwithstanding subsection (1A), no further consultation is required under Section 247(7) in relation to the proposed development.</p> <p>As per Section 247(8), this determination does not prejudice the performance of the Planning Authority of its functions under the Planning Act or any regulations under the Planning Act, or any other enactment, and cannot be relied upon in the formal planning process or in legal proceedings.</p> <p><b>The applicant is advised to retain a copy of this determination to submit at planning application stage for validation purposes.</b></p> <p><b>The applicant should note that any changes to the development that have not been reviewed, or discussed, as part of these 247(7) consultations may result in the application being invalidated at application stage.</b></p>

**Darren Fagan**  
**Executive Planner**