

DOWNEY

29 Merrion Square, D02RW64

Stage 3 LRD Planning Report and Statement of Consistency

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

Client: Bluemont Developments (Firhouse) Ltd.

November 2025

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INTRODUCTION

DOWNEY, 29 Merrion Square, D02 RW64, have prepared this Planning Report and Statement of Consistency to accompany a Large-scale Residential Development (LRD) planning application, on behalf of the applicant, Bluemont Developments (Firhouse) Limited, in relation to the proposed development located at No. 2 Firhouse Road and the former Morton's The Firhouse Inn, Firhouse Road, Dublin 24. The proposed development provides for amendments to the previously granted Largescale Residential Development (LRD) granted under Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24. The amendments, subject to this proposed alteration, are seeking 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, provision of surface level parking, and relocation of substation.

Under Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24, permission was granted for the development of 78 no. residential units and commercial units within a 3- 4-storey block. On foot of the revised Planning Design Standards for Apartments, published on 8th July 2025, which does not provide any specification required for housing mix, the applicant and design team have re-configured the housing mix, to allow for a total of 83 no. residential units and commercial units, within the building footprint permitted under Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24.

The proposed development, as per the statutory planning notices, is as below:

"We, Bluemont Developments (Firhouse) Limited, intend to apply for permission for a 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 Largescale 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, amendments to the housing mix and elevations of Block A and Block B, amended roof profile, 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 within the building footprint granted within 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, 54 no. 1-bedroom units, 5 no. 2-bedroom 3-person units, and 19 no. 2-bedroom 4-person units. The apartment blocks will consist of the following:

- *Block 01: Amendments to the previously permitted 3-storey rising to 4-storey over basement levels, comprising 54 units (2 no. studio units, 15 no. 1-bedroom units, 4 no. 2-bedroom 3-person units, 13 no. 2-bedroom 4-person units, along with 4 no. duplex units comprising 2 no. 1-bedroom units, and 2 no. 2-bedroom 3-person units), to now provide for a 3-storey rising to 4-storey over basement levels comprising of 38 no. units*

as follows: 1 no. studio unit, 16 no. 1-bedroom units, 4 no. 2-bedroom 3-person units, 13 no. 2-bedroom 4-person units, along with 4 no. duplex units comprising 2 no. 1-bedroom units, and 1 no. 2-bedroom 3-person unit and 1 no. 2-bedroom 4-person unit. Each unit will have its own private open space in the form of a private balcony or terraced area.

- *Block 02: Amendments to the previously permitted 4-storey over basement levels comprising 40 units (18 no. 1-bedroom units, 2 no. 2-bedroom 3-person units, 17 no. 2-bedroom 4-person units, and 2 no. 3-bedroom units), to now provide a 4-storey over basement levels comprising of 45 no. units as follows: 38 no. 1-bedroom units, 1 no. 2-bedroom 3-person units, and 6 no. 2-bedroom 4-person units. Each unit will have its own private open space in the form of a private balcony or terraced area.*

The development will also provide for amendments to the permitted 395.2 sq. m. of commercial space (including 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 and 1 no. bookmaker and medical consultancy, located on the ground floor of Block 02) to now provide for 423.5 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 63 no. car parking spaces including accessible parking and Electric Vehicle parking across basement, lower ground floor levels, and surface car parking, 196 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 1 no. pedestrian and cyclist access from Mount Carmel Park, as granted under Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24."

This application has been informed following various Pre-Planning meetings and discussions and the evolution of the amendment design. As discussed above, this application has arisen following a previously permitted LRD application on site under Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24. Within this application, 100 no. houses were proposed for permission, with permission permitted for 78 no. units within a 4-storey apartment block. Since permission was granted by Order dated 26th July 2024, the applicant has begun the process of compliance submissions for the parent permission, along with the beginning of site clearance works to prepare for construction.

The subject amendment application has arisen following discussions with end-users, particularly within the commercial units, and relates to both the construction and operational viability of the scheme. Permission is now being sought for amendments to the car parking, commercial units, as well as 83 no. housing units, units within a 4-storey over basement level apartment block, in accordance with the 2025 Planning Design Standards for Apartments.

This document will be separated into two different sections: Part A will include a planning report for the proposed development, with Part B outlining the Statement of Consistency.

PART A – PLANNING REPORT

1.0 Site Location and Description

The subject site, which measures c.0.46 hectares, is located at the junction of Firhouse Road and Mount Carmel Road, in Firhouse, Dublin 24.

The site itself previously contained 3 no. buildings providing commercial use in the form of a barbershop, public house, office, and betting office. Clearance of the site commenced following the grant of the parent planning permission, as per Figure 3 below. There are numerous services within close proximity to the site, including education (creche, primary, and secondary), religious, health, community, and retail facilities within walking distance of the site.

The site is bound to the south by Firhouse Road, the north-east by Mount Carmel Park, with open space located to the west and north of the site. Under Reg. Ref. SD20A/0140, permission was granted for the construction of 2 no. grass playing pitches at this open space, which is currently under construction for Ballyboden St. Enda's GAA club. The River Dodder and Riverbank Park are located further north of the site. The site can be easily accessed by the R114 road and the public transport system, with Bus Stop 2545 (east/city-bound and Bus Stop 2520 (west/Tallaght-bound) located to the immediate front of the subject site. This bus stop provides services for the S6 route, connecting The Square Tallaght, to Blackrock. There is also a bus stop located 140-metres south of the site, on Ballycullen Road, which provides services for Bus Routes F1 (Tallaght to Ballymun via City Centre, and Bus Route 65B Citywest to City Centre. The site is also within close proximity to the M50 motorway.

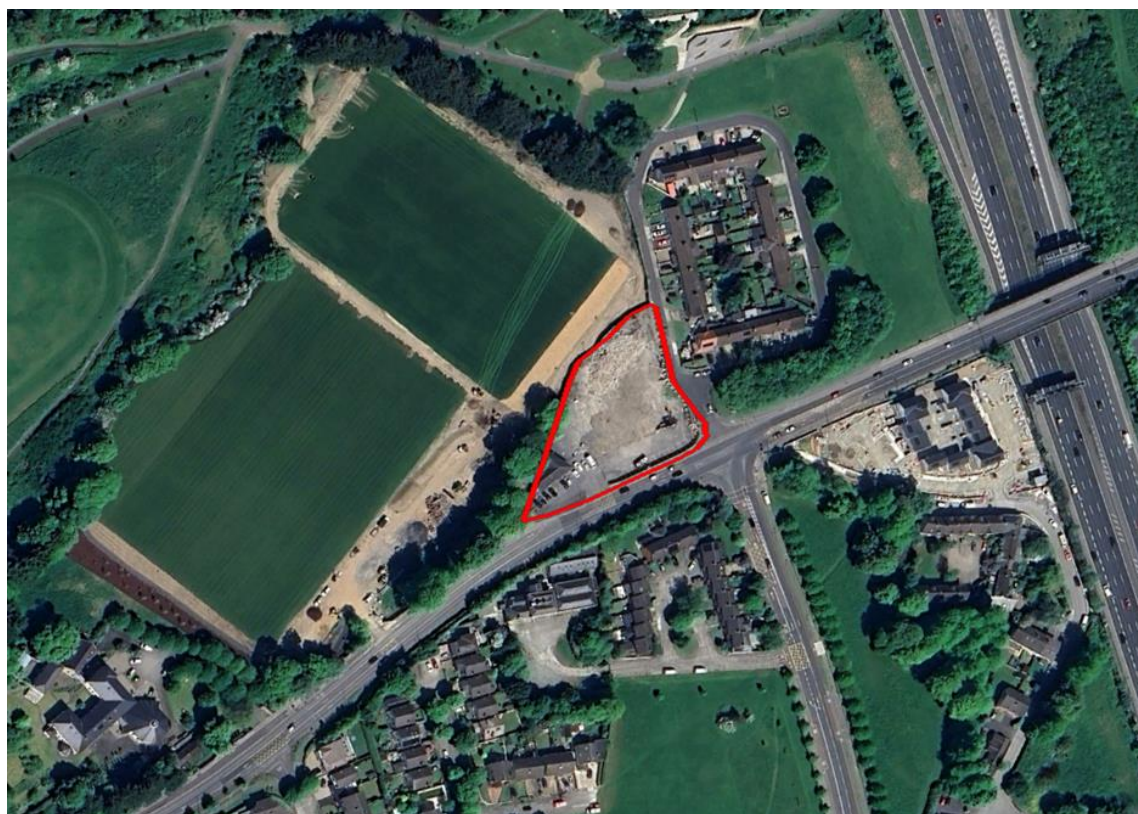


Figure 1. Site in Context – subject site in red fill



Figure 2. Site in context with public transport



Figure 3. Subject site now partly cleared for construction

2.0 Planning History

2.1 Site Specific Planning History

DOWNEY have researched the planning history pertaining to the subject site and found 2 no. historical applications pertaining to the original Firhouse Inn relating to its extension and modification works.

More recently, the following applications were lodged at the subject site:

ABP 313777-22: A Strategic Housing Development application was lodged to An Board Pleanála on 10th June 2022 which provided for 100 residential units arranged in 2 blocks (Blocks 01 and 02) ranging between 3 and 5-storeys in height, as well as circa 355 sq. m. of commercial space.

That decision was ultimately refused by An Coimisiun Pleanála in September 2024. However, given the long delay in a decision being made meant that the applicant prepared a separate planning application under the LRD process. This is set out below:

Ref. Ref. LRD24A/0001 / ABP Ref. ABP Ref. 319568-24: By Order dated 26th July 2024, An Bord Pleanála (now an Coimisiún Pleanála) upheld the decision of the local authority and granted permission at the subject site. The proposal initially applied for 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) comprising; 96 no. apartments, (providing 3 no. studio units, 45 no. 1-bedroom units, 9 no. 2-bedroom (3-person) units, 36 no. 2-bedroom (4-person) units, and 3 no. 3-bedroom units); and 4 no. duplex units (providing 2 no. 1-bedroom units and 2 no. 2-bedroom (4-person) units). Permission was also sought for 342 sq. m. of non-residential/commercial development as follows:

- 1 no. café and 1 no. office located at ground floor level of Block 01 fronting onto Firhouse Road;
- 1 no. creche and associated play area to the rear of Block 01;
- 1 no. barbershop at ground floor level located between Block 01 and Block 02 fronting Firhouse Road; and
- 1 no. bookmaker and 1 no. medical consultancy at ground floor level of Block 02, fronting onto Firhouse Road.

Within Condition 3 of An Bord Pleanála's decision, it was ordered that Level 03 in Block 01 and Block 02 be omitted, and that the space of a ground floor studio unit, be amalgamated into the medical consultancy unit. In total, 78 no. residential units were permitted, along with commercial units on site. The applicant has since submitted a compliance submission to South Dublin County Council for approval in regard to this condition.

The applicant is now seeking amendments to the above granted LRD application.

2.2 Adjoining Area Planning History

DOWNEY have also researched into the Planning History into the surrounding area and found the following application of relevance:

Reg. Ref. SD24A/0228W: on 10th March 2025, permission was granted at The Speaker Connolly Tavern, Firhouse Road, for the development of 55 no. residential units and commercial units, in a 4-

6-storey block, on a site area of 0.323 hectare. While this subject application is subject to a 3rd Party Appeal, South Dublin County Council has deemed the application to be acceptable. This application has a density of 170 units per hectare and a max building height of 21.36-metres.



Figure 4. North Elevation Permitted under Reg. Ref. SD24A/0228W

3.0 Pre-Planning Consultation

The applicant and design team engaged in pre-planning consultation with the Planning Authority prior to lodging the application. Initially, the proposal was to increase the height of the building and add an additional floor in order to provide 5 additional apartments, as well as the changes to the parking layout. The initial Stage 1, Section 247 Meeting (held under Ref. LRDP004 25) took place on 07/05/2025 at 15:00 via Microsoft Teams. The proposal under this amendment application was for an amendment to the previously granted LRD application Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24 in which condition 3 of the An Bord Pleanála's Order granted permission for 78 no. housing units. The previous design sought permission for an uplift of this decision to 83 no. units, along with modifications and improvements to the commercial unit, in a 3-4-storey apartment block, with a set-back 5th storey.

Following this, the applicant lodged a Stage 2, Section 32C LRD Meeting under Ref. LRDP006/25. This meeting took place on 16th July 2025, to discuss a similar amendment application as was submitted at Stage 1 Pre-Planning. During this meeting, South Dublin County Council requested that any future application would provide a strong justification as to the proposed density and height, noting that it is now above the height and density permitted by An Bord Pleanála under ABP Ref. 319568-24. Prior to the Planning Authority issuing their Opinion, the applicant withdrew the pre-planning application in order to submit a revised proposal.

As stated, the previous Pre Planning was withdrawn and the reason for this was to take into account the revised Planning Design Standards for Apartments, published on 8th July 2025. Through compliance with these new Guidelines, it was considered that the additional apartments could be accommodated within the footprint of the extant permission and thus without the need to add an additional floor to the buildings.

Thus, the design team prepared a revised proposal, which allowed for a total of 83 no. residential units and associated commercial units, to be located within the footprint of the building permitted Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24. This Section 247 Pre Application Consultation request was registered under Ref. LRDP008/25, and a meeting was held on 21st August 2025 to discuss the proposal.

Following on from this, South Dublin County Council issued a Section 247 (7) Determination Letter, confirming that the applicant could proceed to lodgement of the application, without the need for a Stage 2 Pre-Planning meeting. This Determination Letter has been submitted under separate cover of the subject application.

4.0 Proposed Development

The proposed development will include amendments to the previously approved LRD application, granted under LRD24A/0001 of 78 no. units (100 no. units originally applied for), located on land at No.2 Firhouse Road and the former Morton's The Firhouse Inn, Firhouse Road, Dublin 24.

The amendments, subject to this proposed alteration, is seeking 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, provision of surface level parking, and relocation of substation.

4.1 Key Characteristics of the Proposed Development

Table 1 below gives an overview of the key data for the proposed development.

Table 1. Key Data of Proposed Development

Site Area	0.46ha.
Units	83 no. in total <ul style="list-style-type: none"> - 1 no. studio - 56 no. 1-bedroom - 26 no. 2-bedroom
Dual Aspect	43%
Density	180 units/hectare
Car Parking spaces	50 no. for residential units, including 1 no. car sharing space. 11 no. for commercial units 2 no. creche set-down areas 63 no. in total
Bicycle Parking spaces	196 no. in total – mix of short-stay, long-stay, Sheffield stands, and cargo spaces
Motorbike Parking	5
Part V Units	20%

The council are invited to refer to the associated drawings, Housing Quality Assessment, and Architectural Design Statement, prepared by O'Mahony Pike Architects, along with all other associated drawings and reports on the proposed development, which are submitted under separate cover of this application for further details on the development.

4.2 Differences Between the Previous LRD Application and the Proposed Amendment Application

Table 2 below outlines the key differences between, the previously proposed LRD application (Reg. Ref. LRD24A/0001), the application granted by An Bord Pleanála (ABP Ref. 319568-24), and the proposed amendments subject to this Pre-Planning Request:

Table 2. Key Data of differences within the scheme

	Previously Proposed LRD application (Reg. Ref. LRD24A/0001)	Granted by An Bord Pleanála (ABP Ref. 319568-24)	Subject Proposed Amendments
Site Area	0.46 ha.	0.46 ha.	0.46 ha.
Residential Units	100 in total <ul style="list-style-type: none"> - 3 no. studio 3% of unit mix - 47 no. 1-bedroom 47% of unit mix - 47 no. 2-bedroom 47% of unit mix - 3 no. 3-bedroom 3% of unit mix 	78 in total <ul style="list-style-type: none"> - 2 no. studio 2% of unit mix - 35 no. 1-bed 45% of unit mix - 39 no. 2-bed 50% of unit mix - 2 no. 3-bed 3% of unit mix 	83 in total <ul style="list-style-type: none"> - 1 no. studio 1% of unit mix - 56 no. 1-bedroom 67% of unit mix - 26 no. 2-bedroom 32% of unit mix
Height	3- 5-storey	3- 4-storey	3- 4-storey
Density	217 units per hectare	169 units per hectare	180 units per hectare
Car Parking Spaces	63 no. spaces to serve the residential development. 17 no. spaces to serve the commercial units. <u>80 no. in total</u>	-	50 no. for residential units, including 1 no. car sharing space. 4 no. for commercial units 2 no. creche set-down areas 63 no. in total
Bicycle Parking Spaces	270	-	196
Commercial Units	342 sq. m. overall: 1 no. café (57 sq. m.), 1 no. office (30 sq. m.),	382 sq. m. overall: 1 no. café (57 sq. m.), 1 no. office (30 sq. m.), 1 no. medical unit (120 sq. m.),	463.3 sq. m. overall: 1 no. café (52.2 sq. m.), 1 no. office (28.3 sq. m.),

	1 no. medical unit (80 sq. m.), 1 no. betting office (32 sq. m.), 1 no. barbershop (28 sq. m.), 1 no. creche (115 sq. m.).	1 no. betting office (32 sq. m.), 1 no. barbershop (28 sq. m.), 1 no. creche (115 sq. m.).	1 no. medical unit (112 sq. m.), 1 no. bookmaker (66.6 sq. m.), 1 no. barbershop (24.4 sq. m.), 1 no. creche (140 sq. m.).
Level Area	B1 1,951 sq. m.	-	575.2 sq. m.
Level Area	B2 1,834 sq. m.	-	383.3 sq. m.

As can be noted above, the key differences between the LRD Proposed scheme under Reg. Ref. LRD24A/0001, what was granted by An Bord Pleanála under ABP Ref. 319568-24, and the subject amendment LRD application are: the provision of an additional 5 no. apartments as well as change to the roof profile and the provision of surface level car parking. The reason for the surface level car parking is to ensure the viability of the commercial units. As mentioned previously, a key reason for the amendments proposed is from a viability perspective, particularly within the commercial units, to make them viable from an operational view of potential occupiers with additional surface level car parking, which is a pre-requisite for potential occupiers. The applicant wishes to state clearly its intention to implement this proposal, and is therefore seeking permission for these amendments, to make this scheme viable from an operational perspective.

4.3 General Layout and Mix

The general layout of the proposed alterations is similar to that of the previously approved LRD application (Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24), in that it provides a mixed-use development comprising 83 no. residential units arranged in 2 no. blocks (Blocks 01 and 02) ranging between 3- 4-storeys in height. All commercial units are to remain on the front side of Firhouse Road to maximise the commercial activation of the site.

The applicant wishes to confirm that within the permitted LRD on-site (Reg. Ref. LRD24A/0001), it was agreed with South Dublin County Council's Active Travel Team to integrate the proposed cycle scheme from Old Bawn to Ballyboden within the proposal, and this is to remain within the design of the proposed amendment scheme.

On foot of the revised Planning Design Standards for Apartments, published on 8th July 2025, which does not provide any specification required for housing mix, the applicant and the design team have re-configured the unit mix, to allow for a total of 83 no. residential units and commercial units, **within the building footprint permitted under Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24.**

Block 01

Block 01 is located within the eastern part of the site, adjacent to Mount Carmel Park and consists of a new apartment block with a height of 3- 4-storeys. DOWNEY notes that this height is as per the

permitted height granted by An Bord Pleanála within their assessment of the previous application (Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24), in which Condition 3 required the removal of Level 03. As such, Block 01 steps down in height to the north of the site to better address its relationship with the existing dwellings at Mount Carmel Park and therefore stepping up in height along Firhouse Road. Within the Inspector's Report of the previously permitted application (ABP Ref. 319568-24), the following was stated:

"The highest section of Block 01 is located on the corner of the junction with Firhouse Road, the five-storey height is maintained along the eastern elevation, then steps down again to three storeys at the point of closest proximity to the houses along Mount Carmel Park. Regarding the concerns raised that the site sits on an elevated position above Mount Carmel Park and is not in keep with the 2 storey houses. The stepping down to three storeys at this location is a successful design approach relative to the adjoining Mount Carmel Park houses, in my opinion."

As such, the subject application has kept to this design approach, while also complying with the removal of Level 03, and as such is considered an acceptable design and height.

Block 01 provides the following:

- 35 no. apartment units (1 no. studio units, 16 no. 1-bedroom units, 4 no. 2-bedroom 3-person units and 13 no. 2-bedroom 4-person units);
- 4 no. duplex units (2 no. 1-bedroom units and 2 no. 2-bedroom units);
- 1 no. creche located at the northern side of the site; and
- 1 no. barber 1 no. café and 1 no. office located on Firhouse Road.

Full details on Block 01 can be found in the enclosed architectural plans, prepared by OMP Architects, which are enclosed under separate cover of this LRD Planning application.

Block 02

Block 02 is located within the western part of the site, adjacent with the Dodder Valley Park and consists of a new apartment block with a height of 4-storeys. Block 02 provides the following:

- 45 no. apartment units (38 no. 1-bedroom units, 1 no. 2-bedroom 3-person units, 6 no. 2-bedroom units; and
- 1 no. bookmaker and 1 no. medical consultancy.

Full details on Block 02 can be found in the enclosed architectural plans and report, prepared by OMP Architects, which are enclosed under separate cover of this LRD Planning application.

Commercial Development

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

The proposed commercial uses are the same as per the permitted application (Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24,), with some minor amendments only being proposed to accommodate the units on foot of the revised unit mix and revisions to car parking.

The non-residential uses will serve both the residents of the proposed development and the existing community owing to the Local Centre Zoning of the site and the sustainability of the development. As previously discussed, the increase in size of the commercial units is being proposed to align with the operational viability of the scheme from an operational perspective. It is also submitted that the increase in commercial floor space being proposed is compliant with the Local Centre Zoning provision and will add to the commercial activation of the scheme along Firhouse Road.

The subject application will also provide the introduction of 15 no. surface level car parking spaces in front of the commercial units, which includes 2 no. accessible space. This amendment has arisen following requests from future potential occupiers of the commercial units, who have requested surface level parking to add to the operational viability of the scheme. As a design response to this, in order to maintain an attractive urban edge along Firhouse Road, the proposed development is seeking to propose landscape measures to enhance the visual amenity of this area, as per the landscape drawings prepared by Jane McCorkell Landscape Consultants.



Figure 5. Site Layout Plan

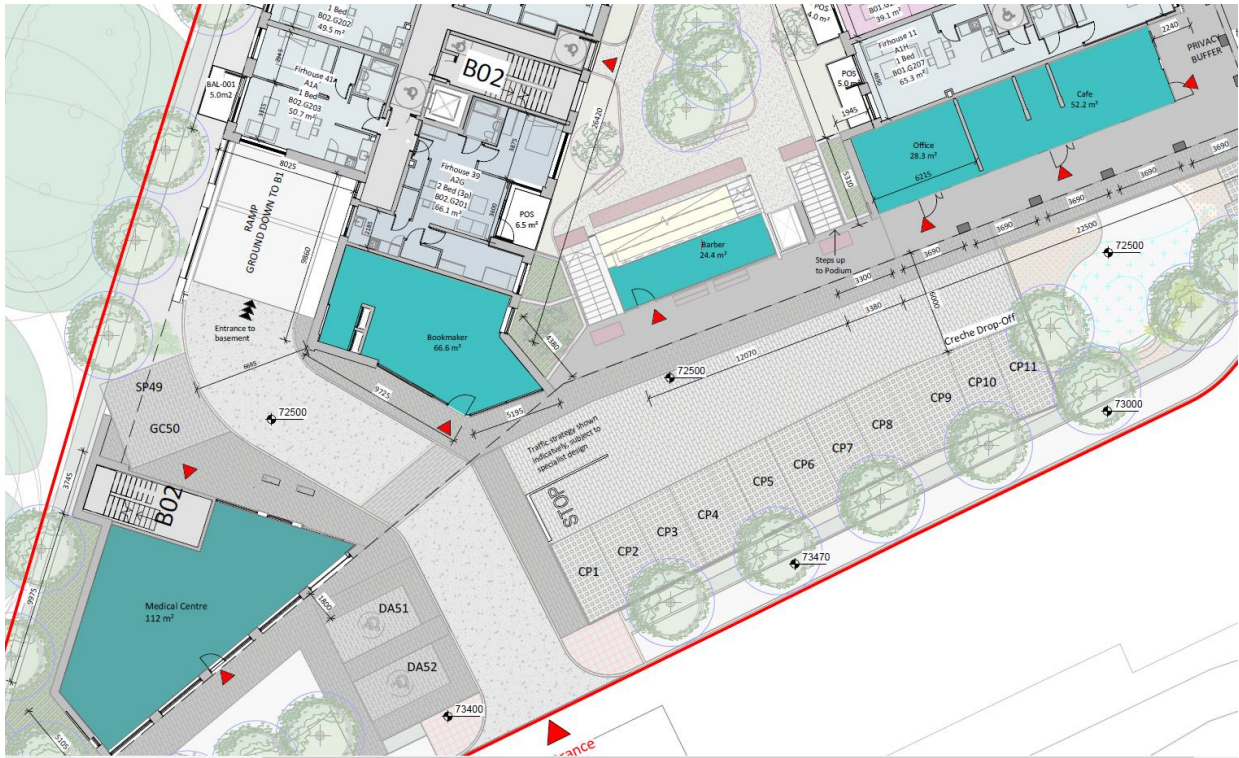


Figure 6. Proposed Commercial Frontage along Firhouse Road

Height

The proposed development seeks to provide a height of 3-4 storeys across the 2 no. blocks. It is important to emphasise that **this height has been permitted under Reg. Ref. LRD 24A/0001 / ABP Ref. 319568-24.**

While the applicant originally sought a height of 3-storeys rising to 5-storeys across the 2 no. blocks. Condition 3 attached to An Bord Pleanála's decision resulted in permission being granted for a 3-storey rising to 4-storeys in height. Since then, the applicant has begun the process of compliance submissions for the parent permission Reg. Ref. LRD 24A/0001 / ABP Ref. 319568-24, along with the beginning of site clearance works to prepare for construction. As set out above, on foot of the revised Planning Design Standards for Apartments, published on 8th July 2025, which does not provide any specification required for housing mix, the applicant and the design team have re-configured the unit mix, to allow for a total of 83 no. residential units and commercial units, **within the building footprint and height permitted under Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24.** As such, the subject application is not seeking any permission for any uplift in the height.

The subject application is however seeking amendments to the roof profile of the proposed block. Permission was previously granted for a pitched roof, with the subject amendment application seeking permission for a flat roof. This will significantly improve biodiversity and green infrastructure as it will be a green-blue roof, allowing for additional SuDS measures to be implemented. As such, the overall perceived height and bulk will be reduced further from the granted height. Within the granted development by An Bord Pleanála (ABP Ref. 319568-24) a height of 18.1-metres was provided, within the subject amendment application a height of 15.8-metres is now seeking permission, as such, there is only a difference in height of 2.3-metres between what was granted and what is now seeking

permission. It is therefore respectfully submitted that the proposed height and elevations is considered acceptable.



Figure 7. Top Previously Permitted and Bottom Proposed East Elevation from Mount Carmel Park



Figure 8. Top Previously Permitted and Bottom Proposed Elevation from Firhouse Road

Density

The current proposal represents a slight increase in the number of units over what was permitted by An Bord Pleanála, i.e. 83 units compared to 78 units. The revised density would be 180 units per hectare. While An Bord Pleanála considered the density of the previous scheme too high under ABP Ref. 319568-24, it is important to note that it was proposed at 100 units, equalling 217 units per hectare. The current scheme proposes a reduction of c. 20% of what was previously proposed and

thus is a significant reduction in density, coupled with the reduction in overall height, the change in roof form to a flat roof also reduces the bulk of the scheme further. In this regard, it is respectfully considered that the proposed amendments will still be consistent with the reasoning behind the Board's (now Commission) previous decision and attached conditions. This is also consistent with the Sustainable Residential and Compact Settlement Guidelines, section 3.4.1 of which allows for an increase in density ranges.

It is important to note that the Planning Inspector, in the previous appeal, raised concerns with the density based on the overall height/scale of the buildings in the context of the surrounding area and also the level and accessibility of public transport that served the site. In response to the first part, the applicant is proposing to add an extra 5 units within the footprint of what was previously granted permission and is, in fact, amending the roof profile so that it will reduce the overall bulk of the building. In response to the second part, the updated TTA by Transport Insights, which is submitted under separate cover, shows that the accessibility of the site has significantly improved through the operation of new BusConnects routes F1, as well as S6 and 65B. This means that the level and frequency of public transport that the site currently benefits from has greatly improved since the last application was granted permission. It is our considered opinion that the Planning Inspector raised more concern with regard to height and its implication on density, rather than specifically the density level in itself. Thus, the fact that the height is now actually being reduced, through the omission of the pitched roofs, as well as improved public transport serving the site means that the justification for the additional 5 units is evident.

Parking

As noted previously, the proposed development seeks to provide the following parking proposals:

Table 3. Proposed Parking

	Required	Proposed
Car Parking Spaces	124.5 (maximum)	50 no. for residential units, including 1 no. car sharing space. 4 no. for commercial units 2 no. creche set-down areas 63 no. in total
Bicycle Parking Spaces	170	196
Motorbike Parking	4	5

Given the evolving trend to move away from private car ownership and a push towards more sustainable travel options, the decreased ratio of car parking spaces is deemed acceptable given the increase in bicycle parking spaces. The proposed car parking provision is also considered acceptable, particularly given the modal shift away from dependency on the private car, and an increased encouragement to use sustainable transport options (including cycling and the adjacent BusConnects Scheme). This has further been achieved through the provision of various bicycle parking spaces, including cargo bicycles.

As noted, and discussed above, the subject development seeking to provide 15 no. surface level parking spaces within the scheme, to cater for the future occupiers of the commercial units. These surface level spaces are being included to make the units viable from an operational perspective and to ensure no commercial unit is left vacant. As such, the design has been amended to cater for these requirements. It is however submitted that further landscaping measures have been included to 'green up' this area. Further details are provided within the landscape drawings submitted under separate cover of the Pre Planning request. This is a critical piece of the scheme as the commercial units will simply not be viable without these surface level spaces and thus there is a risk that they would remain vacant.

The remaining car parking spaces have been provided within the basement levels of the proposal. Transport Insights have prepared auto-tracking drawings of the scheme, which confirms there is sufficient space to manoeuvre down the ramp to the lower basement levels, as well as within the basement levels car parking areas. As a further safety measure, it is proposed to implement a traffic light system within the scheme, to ensure that only 1 no. car can drive up/down the ramp at any one time. Further details of this are provided within the Traffic and Transport Assessment, and associated Traffic drawings, prepared by Transport Insights and submitted under separate cover of the application.

5.0 Planning Context

The proposed development is consistent with the relevant national, regional, and local planning policies as they pertain to these lands. In this regard, Part B of this report contains a Statement of Consistency with Planning Policy, prepared by DOWNEY. In order to avoid undue repetition, South Dublin County Council are invited to refer to Part B of this report to confirm how the proposal is consistent with national, regional, and local planning policy.

Notwithstanding that, it is important to confirm the fundamental planning policies as they relate to the site, particularly land use zoning. The subject site is zoned 'Objective LC'. The objective of this zoning is as follows:

"To protect, improve, and provide for the future development of Local Centres."

The location of the subject lands is within the zoning 'Objective LC', as such the proposed mixed-use is considered permitted in principle uses under the pertaining zoning objective. In light of this, it is considered that the proposed development of 83 no. residential units, and commercial units is considered to be consistent with the objectives of the pertaining zoning designations.

It is also noted from the Land Use Zoning map (Figure 9 below) that there is a proposed cycleway located along the R114 road, leading to Dodder Riverbank Park.

There is also a Protected Structure to the south at Sally Park (RPS no. 285), to the south-east at 2 Homeville (RPS no. 283), and to the west at Carmelite Monastery of the Assumption (RPS no. 284).

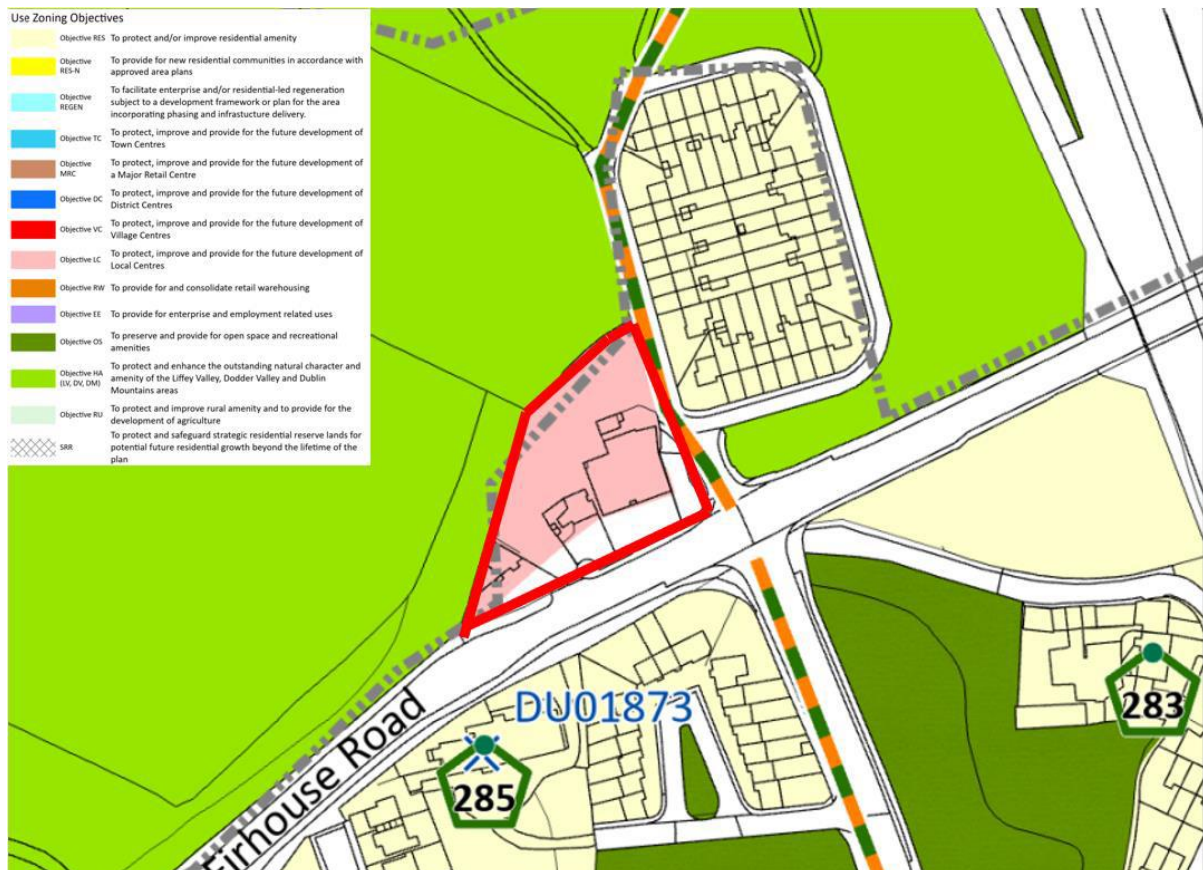


Figure 9. South Dublin Development Plan 2022-2028 Zoning Map – Site in red outline

6.0 Conclusion

This planning report has been prepared in support of the proposed mixed-use development at No. 2 Firhouse Road and the former Morton's The Firhouse Inn, Firhouse Road, Dublin 24. The proposed development is for amendment of the previously granted Large-Scale Residential Development granted under Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24. The amendments, subject to this proposed alteration, is seeking 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, provision of surface level parking, and relocation of substation. The proposed amendments will provide for a total of 83 no. units, with a mix of 1-, 2-, and 3-bed units, within 2 no. blocks ranging in height from 3- 4-stories, as permitted under Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24.

The proposed development is in accordance with the land use zoning pertaining to the subject site. The subject site is suitably located within an existing built-up area and is well served by existing public transport, notwithstanding public transport improvements such as BusConnects, as well as other commercial, recreational, and other local services and amenities for future residents.

The proposed scheme under this application will provide for a high-quality, mixed-use development within this location. The development will maximise the efficiency of the urban land, retain the compact form of the urban area, and help to meet housing demand in accordance with Government policy and guidance.

The applicant has previously engaged in various Pre-Planning Consultation with South Dublin County Council and have sought to address all items raised during this consultation. The latest Pre-Planning Consultation was a Stage 1 Section 247 Pre-Planning Consultation, with South Dublin County Council providing a Section 247(7) Determination Letter, allowing the applicant to proceed to Stage 3, lodgement of the applicant. DOWNEY, on behalf of the applicant, now wish to submit this Stage 3 LRD Planning Application to South Dublin County Council. DOWNEY trust that the enclosed plans and particulars pertaining to this application are in order and look forward to a favourable decision from South Dublin County Council in due course.

PART B – STATEMENT OF CONSISTENCY

1.0 National Policy and Guidelines

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

- Project Ireland 2040: National Planning Framework First Revision, 2025
- Project Ireland 2040: National Development Plan 2021-2030 and National Development Plan Review 2025
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 2024
- Urban Development and Building Heights: Guidelines for Planning Authorities (December 2018)
- Planning Design Standards for Apartments (2025)
- Childcare Facilities: Guidelines for Planning Authorities (2001)
- Design Manual for Urban Roads and Streets (DMURS)
- Smarter Travel: A Sustainable Transport Future
- EIA Directive
- Birds and Habitats Directive – Appropriate Assessment
- The Planning System and Flood Risk Guidelines (2009)
- Climate Action Plan, 2025

1.1 Project Ireland 2040: National Planning Framework First Revision 2025

The National Planning Framework First Revision was approved by the Oireachtas on 30th April 2025.

As set out in the Revised NPF, *“This Framework is revised and updated to take account of changes that have occurred since it was published in 2018 and to build on framework that is in place. It is a framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment – from our villages to our cities, and everything around and in between.”*

The Revised NPF goes on to add, *“In the period between 2022 and 2040 it is expected that there will be roughly an extra one million people living in our country. This population growth will require new jobs and new homes. If we fail to plan for this growth and for the demands it will place on our built and natural environment, as well as on our social and economic fabric, then we will certainly fail in our responsibility to future generations of Irish men and Irish women. That responsibility is to ensure their prosperity and happiness in an ever-changing world.”* In this regard, the Plan sets its vision by:

- *“Developing a region-focused strategy for managing growth; linking this to the Project Ireland 2040 National Development Plan;*
- *using public and private lands for certain strategic purposes with a more active approach to the management of land;*
- *supporting this with strengthened, more environmentally focused planning at local level; and backing the framework up in law, with oversight by the Office of*

the Planning Regulator in the overall context of Ireland's existing international and EU obligations and commitments."

The Revised National Planning Framework (NPF) maintains the same approach as the previous Plan regarding the spatial distribution of growth across the State.

According to the National Planning Framework, Dublin needs to accommodate a greater proportion of the growth it generates within its metropolitan boundaries and to offer improved housing choice, transport mobility and quality of life. Dublin's continued performance is critical to Ireland's competitiveness.

The NPF states that *"the long-term vision for Ireland's housing future aims to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future."*

It is outlined within the Plan that future homes are required to be located where people have the best opportunities to access a high standard quality of life. In Ireland, the location of housing has taken on a dispersed and fragmented character which has led to people living further away from their jobs and often being at a sizeable remove from important services such as education and healthcare. It is stated that it is important to *"prioritise the location of new housing provision in existing settlements as a means to maximising a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure"*.

In terms of Dublin City and the Metropolitan Area, the National Planning Framework 2040 states that: *"At a metropolitan scale, this will require continued focus on a number of large regeneration and redevelopment projects within the existing built-up footprint, and a more compact urban form, facilitated through well designed higher density development."*

"The National Planning Framework targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas. This is applicable to all scales of settlement, from the largest city to the smallest village. This means encouraging more people, jobs, and activity generally within our existing urban areas, rather than mainly 'greenfield' development and requires a change in outlook."

The NPF has a number of national policy objectives which are relevant to this application, which include:

"National Policy Objective 20: In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns, and villages, subject to development meeting appropriate planning standards and achieving targeted growth."

Additionally, the proposed development will support the retail activity and other shops in Firhouse and surrounding areas by bringing in both new consumers and new employment opportunities to the area, thus creating more business opportunities for the existing and future offerings. Based on the economic and retail potential of the area, the proposed scheme will see an increase in employment opportunities, giving the possibility for future and existing residents to live and work in Firhouse.

Furthermore, the proposed development is seeking to consolidate and densify an urban area proximate to primary transport routes, and as such is compliant with the objectives of the NPF.

“National Policy Objective 22: In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth.”

It is evident that there is a strong emphasis placed on increased building heights and increased densities in appropriate locations within existing urban centres and along public transport corridors. As such, it is respectfully submitted that the proposed development will provide for increased heights and densities (c. 180 units per hectare) in a high-quality urban design to achieve targeted growth of the area. The proposed development will also provide for reduced car parking standards with a total of 63 no. car parking spaces proposed which is deemed appropriate given the location of the site, in particular, close to a public transport corridor, high quality pedestrian and cyclist infrastructure, and locations of employment; as such, the proposed development provides 196 bicycle parking spaces. The quality of the architectural design for the development will also ensure that the development can successfully integrate with the surrounding area.

“National Policy Objective 43: Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”

The proposed scheme has taken cognisance of the neighbouring context, and considerations have been made with regard to massing and scale in order to avoid any potential impact the proposed development may have on the surrounding built environment. The emphasis placed on enhancing the connectivity of the area is achieved through the support and promotion of a sustainable transport network based on a pedestrian and cycle first approach, also favouring the use of public transportation.

“National Policy Objective 45: Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development.”

The proposed development for a mixed use, primarily residential, scheme on this brownfield site represents an opportunity to provide for increased density and increased heights in accordance with the NPF policies and objectives. The NPF provides for a strong emphasis towards increased building heights in appropriate locations within existing urban centres and along public transport corridors. The proposed development ranges in height from 3- 4-storeys (over basement levels) and is therefore considered appropriate in this location and in accordance with the objectives of the NPF. Furthermore, it is submitted that while the proposed development will provide for 5 no. similar commercial units on site, so as to utilise the existing uses on site.

DOWNEY are of the considered opinion that the proposed development is consistent with the objectives of the National Planning Framework as it states that *“to more effectively address the challenge of meeting the housing needs of a growing and more diverse population in our key urban areas, it is clear that we need to build inwards and upwards, rather than outwards. This means that*

apartments and compact housing models will need to become more prevalent, particularly in Ireland's cities." The proposed residential development is located in a strategic location in proximity to Dublin's City Centre along with further key metropolitan areas in the County. The National Planning Framework also states that *"while apartments made up 13% of all occupied households in Ireland and 38% of occupied households in the Dublin City Council area in 2022 (Census data)."* It is evident that Ireland is a long way behind European averages in terms of the numbers and proportion of households living in apartments, especially in our cities and larger towns. It is stated within the Project Ireland 2040 plan that *"in many European countries it is normal to see 40-60% of households living in apartments."*

Apartment developments have become an increasingly attractive and desirable housing option for a range of household types and tenures, building on and learning from experience to date, and that the economic and regulatory conditions are such that apartment development attracts investment that will result in greater delivery of apartments in Ireland's cities and towns and other appropriate locations. It is evident that apartment developments are required in urban areas to meet the current demand for housing, particularly in the Dublin area. It is therefore considered that the provision of 79 no. apartment units, and 4 no. duplex units with complementary, mixed land uses, will assist in achieving the objectives of the National Planning Framework.

The NPF *"targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas. This is applicable to all scales of settlement, from the largest city to the smallest village"*. The NPF further states that: *"this means encouraging more people, jobs and activity generally within our existing urban areas, rather than mainly 'greenfield' development and requires a change in outlook. In particular, it requires well-designed, high-quality development that can encourage more people, and generate more jobs and activity within existing cities, towns and villages."*

The proposed development offers a unique opportunity to achieve high-quality development at a density and scale that is appropriate for this location. The area is well served by public transport and benefits from an abundance of existing physical and social infrastructure.

This proposed LRD application will provide for 83 no. residential units, along with a barbershop, a betting office, a café, a medical unit, an office space, and a creche. In light of the above, it is submitted that the proposed development is consistent with the policies and objective of the NPF as a principal component of the NPF is to provide higher density development with increased building heights at appropriate urban locations which are well served by public transport.

1.2 The National Development Plan 2021-2030 and National Development Plan Review 2025

The National Development Plan (NDP) sets out the investment priorities that will underpin the successful implementation of the NPF. This will guide national, regional, and local planning and investment decisions in Ireland over the next two decades to cater for an expected population increase of over 1 million people.

Resolving the systemic factors underlying the current housing crisis is at the heart of the NDP and reflecting this, housing and sustainable urban development is a priority for the National Development Plan. In this regard, the NDP states that there is a *"need to provide in excess of half-a-million more*

homes over the period to 2040 corresponds to a long-term trend of 25,000 new homes every year. A higher level of output is needed in the short to medium-term to respond to the existing deficit that has given rise to the housing crisis.'

Furthermore, the NDP states that *"the continuation of existing patterns of development accentuates the serious risk of economic, social, and environmental unsustainability through, for example, placing more distance between where people work and where people live, and increasing energy demand. The NPF highlights the urgent requirement for a major uplift of the delivery of housing within the existing built-up areas of cities and other urban areas. It has a particular focus on brownfield development, targeting derelict and vacant sites that may have been developed before but have fallen into disuse".*

There are a number of strategic outcomes identified within the NDP which support the proposed development at the subject site. Such outcomes include:

National Strategic Outcome 1: Compact Growth – *"This outcome aims to secure the sustainable growth of more compact urban and rural settlements supported by jobs, houses, services, and amenities, rather than continued sprawl and unplanned, uneconomic growth. This requires streamlined and co-ordinated investment in urban, rural, and regional infrastructure by public authorities to realise the potential of infill development areas within our cities, towns, and villages. This will give scope for greater densities that are centrally located and, in many cases, publicly owned, as well as bringing life and economic activity back into our communities and existing settlements. Creating critical mass and scale in urban areas with enabling infrastructure, in particular increased investment in public and sustainable transport and supporting amenities, can act as crucial growth drivers. This can play a crucial role in creating more attractive places for people to live and work in, facilitating economic growth and employment creation by increasing Ireland's attractiveness to foreign investment and strengthening opportunities for indigenous enterprise".*

National Strategic Outcome 4: Sustainable Mobility – *"The expansion of attractive and sustainable public transport alternatives to private based car transport will reduce congestion and emissions and enable the transport sector to cater in an environmentally sustainable way for the demands associated with longer term population and employment growth envisaged under the NPF. Furthermore, the provision of safe alternative active travel options such as segregated cycling and walking facilities can also help alleviate congestion and meet climate action objectives by providing viable alternatives and connectivity with existing public transport infrastructure".*

The proposed development at the subject site is consistent with the NDP as it involves the consolidation of a strategic location within Firhouse. The proposed development will provide high-quality mixed-use development, comprising both residential and commercial development at the subject site, all of which promotes compact urban growth and good quality of life. The development will be an attractive, vibrant urban centre for people to live in, supported by high-quality physical and social infrastructure as well as vast recreational amenities such as the Dodder Riverbank Park, Firhouse Community and Leisure Club, and the various sports clubs and centres within the area.

The proposed development at the site is also consistent with the sustainable mobility objectives outlined in the NDP. The proposal within Firhouse will ensure walking and cycling are viable options for the community, with the area also well served by both existing and planned public transport infrastructure, along with a proposed new cycle lane along the Firhouse Road, all of which will ensure that the future population utilise sustainable public transport and active travel options rather than private/car transport. The proposed development will provide sufficient bicycle parking spaces within the development to assist in the modal shift towards more active travel. The subject site is within walking distance of various existing bus services and will be served by a future Bus Connects service.

National Strategic Outcome 7: Enhanced Amenity and Heritage – *“The NPF recognises the value of cultural heritage as a key component of, and contributor to, the attractiveness and sustainability of our cities, towns, villages, and rural areas in terms of developing cultural creative spaces, private inward investment, and attracting and retaining talent and enterprise. This includes all elements of living space including streets, public spaces, built heritage and natural amenity areas, cultural and sporting opportunities, and sustainable transport networks, all of which play a central part in defining the character and attractiveness of places”.*

National Strategic Outcome 10: Access to Quality Childcare, Education and Health Services – *“Access to quality primary education, health services and childcare, relative to the scale of a region, city, town, neighbourhood or community is a defining characteristic of attractive, successful and competitive places”.*

The proposed development, subject to this LRD application, will benefit from the living space already established within Firhouse including the network of local streets, public spaces throughout the area and natural open spaces such as the Dodder Riverbank Park. This park offers active and passive recreation for the community such as fitness trails, playgrounds, sports fields, and seating areas. The proposed development will also be close to several schools, health services and childcare facilities, with additional facilities proposed as part of the development, including a café, an office, a medical unit, a betting office, a retail unit and a creche. This level of service and amenity provision ensures that Firhouse is an attractive place to live and work. In light of the above, it is submitted that the proposed development is consistent with the National Development Plan.

1.3 Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities, 2024

Adopted in January 2024, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities outline national planning policies focused on sustainable residential growth and the development of compact settlements in both urban and rural areas. These guidelines, which replace the 2009 Sustainable Residential Developments in Urban Areas Guidelines, have been updated to reflect current government policies and broader economic, social, and environmental considerations. They align with the NPF and provide detailed guidance on settlement growth priorities, residential density, urban design, and placemaking. Additionally, the guidelines introduce flexible development standards to support a wider range of housing options tailored to the specific context of various settlement sizes, from cities to smaller towns and villages.

Issued by Minister Darragh O'Brien and Minister Kieran O'Donnell under Section 28 of the Planning and Development Act 2000 (as amended), these guidelines are mandatory for planning authorities and An Coimisiún Pleanála, ensuring consistency with specific planning policy requirements (SPPRs) as part of their statutory functions.

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

As outlined in the Guidelines, the Government policy continues to support a tiered approach to residential density, similar to the framework established in the 2009 Sustainable Residential Development in Urban Areas Guidelines. This approach promotes the highest residential densities in central and accessible urban locations, with overall development becoming more compact and sustainable.

As per the Compact Settlement Guidelines, the subject site can be defined as '**City Suburban/Urban Extension**' and falls within the category of '**Accessible**' – allowing for a consideration of higher density.

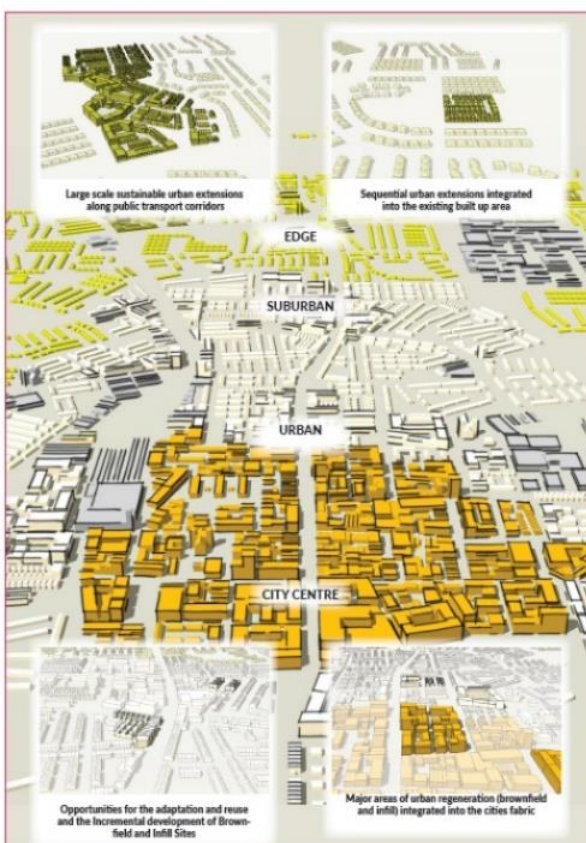
Section 3.4 of the Sustainable and Compact Settlement Guidelines for Planning Authorities relates to 'Refining Density' and states that the "*density ranges set out in Section 3.3 should be considered and refined, generally within the ranges set out, based on consideration of centrality and accessibility to services and public transport.*" Section 3.4.1 further states the following:

"Densities above the ranges are 'open for consideration' at accessible suburban and urban extension locations to the maximum set out in Section 3.3."

"The approach to refining density should be informed by the capacity and wider network accessibility of public transport services at a node or interchange (number of options, capacity, and peak hour frequency) and the journey time to significant destinations (e.g., city centre or significant employment location.)"

It is therefore considered that the construction of 83 no. residential units, set out in 2 no. blocks, ranging in height from 3- 4- storeys, along with the provision of commercial units on site, represents healthy placemaking and in accordance with the guidelines and policies set out above.

Figure 3.2:
Illustration of typical area types and key areas of growth within cities.



Within the previous application submitted to South Dublin County Council under Reg. Ref. LRD24A/0001, it was proposed to provide 100 no. housing units, which resulted in a density of 217 units per hectare. An Bord Pleanála then granted permission for 78 no units under ABP Ref. 319568-24, which resulted in a density of 170 units per hectare. The subject amendment application is now seeking permission for an uplift of only 5 no. units within the development, to a total of 83 no. units, which would be a density of 180 units per hectare. It is considered that this amendment is only a slight increase in the overall units proposed, however will contribute significantly to the overall viability of the scheme from an operational and construction perspective. Nonetheless, DOWNEY submit that given the site's location within proximity to a number of high-frequency and high-quality public transport networks, a density of 180 units per hectare is considered acceptable.

1.4 Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)

The 'Urban Development and Building Heights, Guidelines for Planning Authorities' are intended to set out national planning policy guidelines on building heights in relation to urban areas, building from the strategic policy framework set out in the National Planning Framework 2040 (NPF). This document recognises that in recent years local authorities, through the statutory plan processes, have begun to set generic maximum height limits. However, such limits if inflexibly and unreasonably applied, can undermine national policy objectives to provide more compact urban forms as outlined in the National Planning Framework and instead can continue unsustainable patterns of development.

These Guidelines reinforce that *"a key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels"*.

The document states that it is critically important that development plans identify and provide policy support for specific geographic locations or precincts where increased building height is not only desirable but a fundamental policy requirement. Locations with the potential for comprehensive urban development or redevelopment should be identified where, for example, a cluster of higher buildings can be accommodated as a new neighbourhood or urban district or precinct.

Section 1.10 of the Guidelines state *"the rationale (...) for consolidation and densification in meeting our accommodation needs into the future must also be applied in relation to locations that development plans and local area plans would regard as city and town centre areas"*. It continues, *"in such areas, it would be appropriate to support the consideration of building heights of at least 6 storeys at street level as the default objective, subject to keeping open the scope to consider even greater building heights by the application of the objectives and criteria laid out in Sections 2 and 3 of these guidelines, for example on suitably configured sites, where there are particular concentrations of enabling infrastructure to cater for such development, e.g. very significant public transport capacity and connectivity, and the architectural, urban design and public realm outcomes would be of very high quality"*.

Section 1.11 states *"these guidelines therefore set out national planning policy that:*

- *Expand on the requirements of the National Planning Framework; and*

- *Applies those requirements in setting out relevant planning criteria for considering increased building height in various locations but principally (a) urban and city-centre locations and (b) suburban and wider town locations”.*

The Guidelines go on to state that *“in relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility.”*

The following Specific Planning Policy Requirements are contained within the Guidelines and are relevant to the proposed development:

Specific Planning Policy Requirement 1 – *“In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height”.*

The proposed development is situated at a strategic location within Firhouse and is capable of supporting taller buildings and increased density. The site is excellently served by public transport, bus, with a proposed Bus Connects route designed to serve the site. The development provides a 3-4-storey apartment development, which is considered to be acceptable at this site location.

Specific Planning Policy Requirement 2 – *“In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office, commercial, appropriate retail provision, and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social, and community infrastructure, including leisure facilities”.*

The proposed development seeks to provide for 83 no. residential apartment units. Furthermore, there will be a mix of uses within the development itself comprising childcare facilities, café, offices, and more, as well as residential amenity facilities. This will all add to the variety and mix of the development as well as creating active frontage and animation to the development.

Section 3 of the Guidelines sets out development management principles and criteria that proposals for higher buildings are to be assessed against. The application complies with the criteria in Section 3.2 of the Building Height Guidelines and meets the standard set by the High Court in *Rita O’Neill v An Bord Pleanála* [2020] IEHC 356 where McDonald J. highlighted (at para.157) the requirement contained within Section 3.2 of the criteria referable to SPPR3(A) that an application is required to demonstrate to the satisfaction of the planning authority (in this case South Dublin County Council) that the proposed development satisfies the criteria which are set out over the next three pages of

the guidelines and which are broken down into four distinct categories. The judgment identified that, among the criteria that a proposed development must satisfy are the following:

(a) It is a requirement that the development site should be well served by public transport with high capacity, frequent service and good links to other modes of public transport;

(b) In the case of development proposals incorporating increased building height, there is a requirement that these should successfully integrate into/enhance the character and public realm of the area;

(c) There is also a requirement that the form, massing, and height of a proposed development should be carefully modulated so as to maximise access to natural daylight and views and minimise overshadowing and loss of light;

(d) The guidelines also state that specific assessments may be required including an assessment that the proposed development allows for the retention of important telecommunication channels. In *Spencer Place Development Co. Ltd. v Dublin City Council* [2020] IECA 268 the Court of Appeal stated that *“In contrast with Ministerial guidelines generally - to which planning bodies must ‘have regard’ but which do not impose binding obligations as such - planning authorities, regional assemblies and An Bord Pleanála (‘ABP’) are statutorily required to ‘comply’ with SPPRs in the performance of their functions.”*

It is clear from the decision of the Court of Appeal that, in cases where SPPR3(A) applies, this requires a planning authority to undertake the assessment of a development proposal against the development management criteria contained in Chapter 3 of the Guidelines – namely the criteria specified in detail in section 3.2 of the Building Height Guidelines.

As set out below, it is respectfully submitted that the application meets that threshold.

Development Management Criteria in Section 3.2 of the Guidelines:	
At the scale of the relevant city/town	
Criteria of Guidelines	Evaluation and consistency of proposed development
The site is well served by public transport with high capacity, frequent service, and good links to other modes of public transport.	The proposed development site is served by a number of bus routes serving stops located on Firhouse Road and Ballycullen Road, namely the S6, 49, and 65b and F1. Furthermore, the 54a, 82, and 65 routes operate on the N81 to the north of the site which can be accessed via pedestrian and cycle infrastructure through Dodder Valley Park and under the M50 junction to the northeast of the site. The high frequency routes 15 and S8 also operates on the St. Colmcille’s Way (R113) to the south of the site. High frequency urban bus routes will be provided as part of the BusConnects

	<p>programme which will further enhanced public transport within the area providing bus services at 10–15-minute intervals.</p>
<p>Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment by a suitably qualified landscape architect.</p>	<p>The proposed development includes 2 No. buildings on a c. 0.46 ha site ranging in height from 3- 4-storeys. The design strategy locates lower heights around the edge of the site (3-storeys with setback) in closest proximity to existing residential properties in order to minimise potential impacts on the residential amenities of these properties in relation to overlooking, daylight and sunlight impact, overshadowing and overbearing.</p> <p>The topography of the site has also been used, where possible, to minimise visual impact yet deliver buildings to an appropriate height and scale. It is considered that this approach successfully integrates the new development into the area and whilst clearly comprising a new and higher density form of development than the prevailing two storey housing, it will not give rise to significant amenity or visual impacts.</p>
<p>On larger redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.</p>	<p>Notwithstanding that the site is a small infill site in nature, the proposed development is designed to include new spaces and pedestrian/cyclist routes which serve to create a more animated streetscape on a corner site. The scheme will deliver a gross density of 180 units per hectare through the provision of a range of architectural styles and contrasting scales within the development.</p> <p>As noted above, the proposed development responds to the scale of adjoining development through the varied use of building heights (lower along the eastern edges) and the creation of generous separation distances between the taller elements of the scheme and neighbouring properties.</p>

At the scale of the district/neighbourhood/street:	
The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.	The proposal will inherently improve the existing streetscape through the provision of public open space and significant public realm improvements as well as introducing active street frontages. The landscape strategy for the lands will enhance the connections to the Dodder Valley Park and promote the provision of pedestrian and cycle routes through the site and along the adjoining road, in line with the proposals by South Dublin County Council.
The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials/building fabric well considered.	<p>The subject development comprises 2 no. residential buildings, along with other commercial units, which are of varying scale, form, and height. A simple palette of materials, the use of setbacks at roof levels and the introduction of a variety of balcony types provide appropriate visual variety to the elevations and the massing of the buildings.</p> <p>The design will also activate the street frontage along Mount Carmel Park which is currently defined by a render wall and gateway. All details regarding the material and elevation treatment are contained within the enclosed Architectural Design Statement, which is submitted as part of this planning application, as well as the compliance submissions of Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24.</p>
The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of <i>"The Planning System and Flood Risk Management-Guidelines for Planning Authorities"</i> (2009).	<p>Regarding flood risk, a flood risk assessment has been included in the Engineering Site Services Report, submitted under separate cover. The assessment concluded that the site will not be subject to flood risk due to it being in Flood Zone C and is therefore appropriate for residential development. This was also agreed upon by South Dublin County Council and An Bord Pleanála within their assessment of the parent permission under Ref. Ref. LRD24A/0001 / ABP Ref. ABP Ref. 319568-24.</p> <p>The proposed development will deliver an area of new public open space that is fully accessible</p>

	to the public. The creation of this space and the incorporated setback distances between the proposed development and existing neighbouring properties enables building ranges between 3- 4-storeys to be established on the site.
The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.	The proposed development, which will introduce a new residential development together with commercial uses will be a new destination for the future occupiers of the development and the existing community. The proposal includes a number of new pedestrian and cyclist access points which enable connection into the existing road and street network.
The proposal positively contributes to the mix of uses and/or building/ dwelling typologies available in the neighbourhood.	<p>The proposed development will deliver a wide range of uses including residential, crèche, café, office, medical unit, barber shop and a betting office. These uses will all contribute to the existing services available within the area.</p> <p>The proposal will deliver a range of residential unit types that will serve a wide range of household types. The unit mix will include Studio, 1-, and 2-, apartments which is deemed acceptable.</p>
At the scale of the site/building	
The form, massing and height of the proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.	<p>The development is designed to ensure that there will be no significant overshadowing or loss of daylight or sunlight to adjoining residential properties. Building heights, particularly those adjacent to housing within Mount Carmel Park, have been designed to minimise impact on access to sunlight or daylight on these properties.</p> <p>Within the previous application on site proposed for 6-storeys in height under Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24, no issues of overshadowing or a loss of daylight were envisioned, which was accepted by South Dublin County Council and An Bord Pleanála. As such,</p>

	<p>with the subject application seeking a reduction in the height of the proposal previously assessed for, it can be assumed that no issues will arise within the subject development.</p> <p>Nonetheless, Digital Dimensions, have prepared a Daylight & Sunlight Report, which provides further details in this regard. Furthermore, the development has also been designed to maximise daylight and sunlight access to the proposed residential units and amenity spaces within the development.</p>
Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guidelines like the Building Research Establishment's <i>'Site Layout Planning for Daylight and Sunlight'</i> (2 nd Edition) or BS 8206-2:2008 – <i>'Layout for Buildings – Part 2 Code of Practice for Daylighting'</i> .	The proposed development is assessed having regard to the BRE 'Site Layout Planning for Daylight and Sunlight' Requirements, which confirms that daylight and sunlight assessment undertaken, accords in full, with the methodology set out in the above referenced guidance.
Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.	As noted above, the daylight, sunlight and overshadowing assessments demonstrate an excellent level of compliance with the target values set out in the BRE Guidelines.
Specific Assessment	

<p>Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative microclimatic effects where taller buildings are clustered.</p>	<p>As the proposed development is of moderate scale and height, up to 5-storeys, and will not result or contribute to a cluster of tall buildings, it is not considered that micro-climatic impacts will arise.</p> <p>The design strategy and landscaping proposals at roof and podium levels, will ensure all amenity areas are fully useable throughout the year.</p> <p>Additionally, the Daylight & Sunlight Report demonstrates that all outdoor amenity spaces have been afforded of excellent levels of sunlight throughout the day and throughout the year and the pedestrian environment, from a sunlight perspective, will be comfortable.</p>
<p>In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and/or collision.</p>	<p>Bird surveys and bat surveys were previously carried out by Flynn Furney Environmental Consultants as part of the application process at optimal times of the year and submitted with the parent permission (Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24.)</p> <p>In terms of bats, the previous surveys found no bats or evidence of bat presence, was noted in the Firhouse Inn building and the two adjacent buildings. The Bat Survey Report submitted with the parent permission (Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24) recommended that an ecologist has input into the external lighting plan for the future development to ensure the correct positioning and models of lighting columns are installed and the habitats around the development are not impacted by light overspill.</p> <p>No birds were observed entering or exiting any of the buildings at the former Firhouse Inn and the adjacent buildings. No nesting activity was observed in any of the areas within the grounds of these premises. A number of bird species were seen and heard overflying the site and alighting in the mature trees adjoining the site.</p>

	Due to the modest height of the proposed development it is the considered opinion of DOWNEY that flight lines of birds will not be negatively impacted.
An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.	There are no telecommunication channels currently traversing the subject site, therefore none will be affected due to the proposed development of this proposal.
An assessment that the proposal maintains safe air navigation.	An Aeronautical Assessment is not considered necessary as the maximum height of the proposed scheme is 4-storeys and the site is a considerable distance from the airport. This was agreed within the parent permission of the subject application, Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24.
An Urban Design Statement including as appropriate, impact on the historic building environment.	An Urban Design Statement has been prepared by OMP Architects, which is submitted under separate cover as part of the application. This sets out the existing context of the site along with the rationale for design approach and assessment of receiving environment. The Council are invited to refer to these for further details.
Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.	<p>An EIA screening was previously undertaken by AWN Consulting within the parent permission (Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24) which was previously deemed acceptable.</p> <p>A screening for appropriate assessment and ecological impact assessment was also undertaken by Flynn Furney Environmental Consultants within the parent permission Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24 and was deemed acceptable.</p>

It is evident from the foregoing that the proposal to provide for buildings in excess of 16 metres at the subject site is in accordance with these Guidelines. In this regard, it is important to note that the Board found that the development was consistent with Section 3.2 of the Guidelines.

Specific Planning Policy Requirement 3: - *“It is a specific planning policy requirement that where;*

- (A) 1. An applicant for planning permission sets out how a development proposal complies with the criteria above, and
2. The assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;
- Then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise”.

This request for Stage 2 LRD Pre-Planning consultation contains a significant range of supporting reports, documentation, plans and justification, prepared by the design team, to support the proposed development and outlines how the development is in accordance with the relevant planning policies and guidelines pertaining to the area.

Specific Planning Policy Requirement 4 – *“It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:*

1. *The minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act, 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;*
2. *A greater mix of building heights and typologies in planning for the future development of suburban locations; and*
3. *Avoid mono-type building typologies (e.g., two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more”.*

The proposed development provides for a development of 83 no. units (density of 180 units per hectare) across 2 no. apartment blocks that will range in height from 3- 4-storeys. It is respectfully submitted that the density proposed is in accordance with the national guidelines referred to in SPPR 4. Furthermore, the development will provide for a range of building types and heights.

In light of the above, it is considered that the proposed development is consistent with the requirements of these guidelines on building heights for urban developments and that greater heights and taller buildings are achievable. The proposed development at Firhouse is very well served by existing public transport networks, along with proposed future ‘BusConnects Programme’ and therefore can be expected to achieve high density residential development. Allowing for some tall buildings will help to achieve this aim.

Table 4. Compliance with Specific Planning Policy Requirements

Specific Planning Policy Requirement	Compliance
SPPR1 (building height and density)	In compliance
SPPR2 (building height and mix of uses)	In compliance

SPPR3 (Assessment of planning applications)	In compliance in light of content of application submission
SPPR4 (Development of greenfield/edge of city/town centre sites)	In compliance

1.5 Planning Design Standards for New Apartments (2025)

The ‘Sustainable Urban Housing: Design Standards for New Apartments’ build on the content of the 2015 and 2020 apartment guidance. The Guidelines constitute Ministerial Guidelines under Section 28 of the Planning and Development Act 2000 (as amended) and all planning authorities are to have regard to these Guidelines as they take precedence over any conflicting policies. The Guidelines state that it is “critical to ensure that apartment living is an increasingly attractive and desirable housing option for a range of household types and tenures.”

The Guidelines state that Ireland is a long way behind European averages in terms of the numbers of households living in apartments, especially in our cities and larger towns. Given the gap between Irish and European averages in numbers of households living in apartments and the importance of addressing the challenges of meeting the housing needs of a growing population in our key cities and towns and by building inwards and upwards rather than outwards, apartments need to become the norm for urban housing solutions.

The Guidelines also have specific planning policy requirements (SPPRs), which include:

“Specific Planning Policy Requirement 1 – (a) With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.

(b) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.”

Following on from this policy, the applicant and design team have re-designed to internal unit mix of the proposed scheme, to allow for additional 1- and 2-bedroom units. The subject proposal seeks to provide a total of 83 no. units with a unit mix as follows:

Unit Type	No.	Percentage
Studio	1	1.2%
1-bedroom	56	67.5%
2-bedroom	26	31.3%

Total	83	100%
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As such, the proposed development complies with SPPR1 of the Design Standards.

Specific Planning Policy Requirement 2 – The following minimum apartment floor areas shall apply, and statutory plans shall not specify minimum floor areas that exceed the minimum floor areas set out below:

- *Studio apartment (1 person) 32 sq. m*
- *1-bedroom apartment (2 persons) 45 sq. m*
- *2-bedroom apartment (3-persons) 63 sq. m.*
- *2-bedroom apartment (4 persons) 73 sq. m*
- *3-bedroom apartment (4-persons) 76 sq. m.*
- *3-bedroom apartment (5 persons) 90 sq. m*

OMP Architects have prepared a Housing Quality Assessment of the proposed development, outlining the floor area proposed for each unit within the development, which confirms that the proposal complies with the above standards.

Specific Planning Policy Requirement 3 -

“In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

(i) A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.

(ii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.”

The subject development provides for approximately 43% of the units to be dual aspect given the small nature of the site, which is considered acceptable.

In this regard, the proposed development at Firhouse provides for a total of 83 no. residential units including ancillary residential amenity facilities and 1 no. childcare facility, along with various other commercial development. The development provides residents with the required level of amenity as outlined within the Guidelines, with high-quality residential communal space provided within the development. DOWNEY are of the professional opinion that the proposed development complies with the SPPRs/requirements of the ‘*Planning Design Standards for Apartments*’. The proposed development will help to meet the current demand for apartment type developments. For further information in this regard, please refer to the enclosed architectural drawings and detailed ‘Housing Quality Assessment’ schedules prepared by OMP Architects, which provide confirmation that the proposed development is consistent with the design standards of these Guidelines.

In terms of Children's Play areas, the proposed development has considered the recreational needs of children and incorporates children's play areas as part of the communal amenity spaces within the scheme. As stated within the Guidelines:

"Children's play needs around the apartment building should be catered for:

- within the private open space associated with individual apartments;*
- within small play spaces (about 85-100 sq. m) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and,*
- within play areas (200-400 sq. m) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms."*

The proposed landscape plan submitted with the development, prepared by Jane McCorkell Landscape Architects, provides for a mix of small play spaces for younger children up to the age of 6 years as well as spaces for older children. These spaces are provided with safe access and are located in a central communal open space and within the public open space areas within sight of the apartment buildings. Therefore, it is submitted that the proposed development is consistent with the Guidelines in this regard. For further information in this regard, please refer to the landscape drawings and report that has been prepared by Jane McCorkell Landscape Architects and submitted under separate cover of the application.

In relation to bicycle and car parking requirements, the Guidelines outline the importance of bicycle parking within apartment schemes, while also stating that car parking provision should be substantially reduced where feasible. The Guidelines refers to the Sustainable Residential Development Compact Settlement Guidelines for the quantum of parking required in new schemes. In this regard, it is proposed to provide for a total of 196 no. bicycle spaces, in high quality, safe and accessible locations throughout the scheme, and 63 no. car parking spaces in accordance with the pertaining Guidelines.

1.6 Design Manual for Urban Roads and Streets (DMURS)

The Design Manual for Urban Roads and Streets (DMURS) 2013 (as amended in 2019) sets out design guidance and standards for constructing new and reconfigured existing urban roads and streets. It also sets out practical design measures to encourage more sustainable travel patterns in urban areas.

The subject application is seeking permission for a surface level car parking spaces, leading into car parking spaces on the lower ground floor and in the basement levels. An updated Traffic and Transport Assessment Report has been prepared by Transport Insights which confirm that the proposed development complies with the provision of DMURS.

1.7 Smarter Travel: A Sustainable Transport Future

In summary, 'Smarter Travel: A Sustainable Transport Future' states that *"to achieve the vision of a sustainable transport system, individual lifestyles will have to change and collectively we will have to work progressively on a range of solutions which deal with apparently conflicting goals: economic growth, reduced emissions, less use of motorised transport and better accessibility."*

The five key goals of this transport policy are as follows:

- Improve quality of life and accessibility to transport for all and, in particular, for people with reduced mobility and those who may experience isolation due to lack of transport.
- Improve economic competitiveness through maximising the efficiency of the transport system and alleviating congestion and infrastructural bottlenecks.
- Minimise the negative impacts of transport on the local and global environment through reducing localised air pollutants and greenhouse gas emissions.
- Reduce overall travel demand and commuting distances travelled by the private car.
- Improve security of energy supply by reducing dependency on imported fossil fuels.

It is considered that the proposed development complies with *Smarter Travel: A Sustainable Transport Future*. The proposed development provides housing and commercial uses within Firhouse and is located close to a various bus routes servicing to/from Dublin City and the wider Dublin area.

The proposed development also provides considerable secure, covered bicycle parking for future residents and visitors to again encourage the use of sustainable modes of transportation. This can also be noted within the scheme with an enhanced permeability and connectivity to adjoining sites with new access onto the R114 for pedestrians and cyclists. Following consultation with South Dublin County Council's Active Travel team within the previous application (Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24), the proposed development has also included in its design the proposed new cycle path from Old Bawn to Ballyboden which seeks to enhance the active travel within the area. It is evident that the proposed scheme's main aim is to facilitate and support the use of sustainable transport.

In light of the above, it is considered that the proposed development is consistent with this national transport policy and will assist in its implementation.

1.8 Childcare Facilities: Guidelines for Planning Authorities (2001)

Government policy on childcare is to increase the number of childcare places and facilities available and to improve the quality of childcare services for the community. These Guidelines for Planning Authorities on Childcare Facilities provide a framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals.

In relation to housing, the Guidelines provide a benchmark provision of one childcare facility per 75 dwellings (i.e., 20 child spaces per 75 dwellings) is recommended. It is noted that 1-bed or studio type units should generally not be considered to contribute to a requirement for childcare provision, and subject to location this may also apply in part or whole, to units with two or more bedrooms.

In this case, a residential development of 83 No. units is proposed; 31% of those units are 2-bed units. The previously granted application (Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24) included a crèche c. 114 sq. m. which was granted permission by South Dublin County Council and An Bord Pleanála. The subject amendment application is therefore seeking to provide a similar creche facility within the development, to cater for the future demand of childcare spaces within the development. DOWNEY have prepared a Community and Social Infrastructure Audit to assess the existing capacity within the local childcare network of the site. This assessment concluded that while there is a wide range of

childcare facilities within a 2km range of the site, given the demographic profile and increasing population in the area, there is still a high demand for further childcare facilities in the area, with many occupying long waiting lists. It is therefore submitted that the proposed creche along with associated play area, will sufficiently cater for the proposed development.

1.9 EIA Directive

The EIA Directive 85/337 EEC, as amended, is the key legislation in EU Environmental Policy. The EIA Directive aims to determine the likely significant effects of a project on the environment. Screening is the first stage in the EIA process required by Article 4 of the EIA Directive and this process determines whether an EIA is required for a specific project. The Directive outlines in Article 4(1) 24 Annex 1 projects that require a mandatory EIA. Article 4 (2) outlines Annex 2 projects that require consideration for EIA further to a case-by-case examination or through thresholds and criteria set out by Member States. In an Irish context, projects requiring a mandatory EIA or consideration for EIA further to a case-by-case examination or thresholds are listed in Schedule 5 of the Planning and Development Regulations.

An EIA Screening Report had previously been prepared and submitted with the parent permission (Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24) which carried out a full screening assessment if the Council determine that a preliminary screening assessment cannot screen out the development. The previous application provided for a total of 100 no. residential units and a number of commercial units on brownfield site. Noting the mandatory requirements for an EIA, the proposed development did not meet the threshold for an EIA and as such did not require an Environmental Impact Assessment to be undertaken. Given that the amendment application is seeking permission for 83 no. housing units on the same site, it is submitted that the results of the previous EIA screening report remains valid.

1.10 Bird and Habitats Directive – Appropriate Assessment

Flynn Furney Environmental Consultants had previously screened the parent permission (Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24) for Appropriate Assessment in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/32/EEC). This screening report evaluated the proposed development at Firhouse to determine whether or not significant negative impacts on Natura 2000 sites are likely to arise by virtue of its construction and use.

The screening report concluded that the proposed development is not located within or directly adjacent to any SAC or SPA, but pathways do exist to a number of these areas. An assessment of the aspects of the project showed that significant negative effects are not likely to occur to these areas either alone or in combination with other plans and projects. The Appropriate Assessment procedure was therefore concluded at this Screening Stage, and a detailed (Stage 2) Appropriate Assessment was not required. This was also considered acceptable by South Dublin County Council and An Bord Pleanála within their assessment of the previous application (Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24).

Flynn Furney Environmental Consultants had also previously completed an Ecological Impact Statement, which was informed by a bat and mammal survey carried out by Irish Wildlife Surveys. The report confirmed that the site is in a location characterised by built surfaces and low biodiversity value habitats and that significant long-term impacts to biodiversity are considered unlikely to occur.

Flynn Furney have now prepared (under separate cover) an update AA Screening and EclA for the proposed amendments, which provide a similar conclusion and the development has been screened out for further assessment. The Planning Authority are invited to refer to these reports for further details.

1.11 The Planning System and Flood Risk Guidelines

These Guidelines require the planning system at all levels to avoid developments in areas at risk of flooding, particularly floodplains, except where there are no suitable alternative sites available in areas at lower risk that are consistent with the objectives of proper planning and sustainable development. Where such development has to take place, in the case of urban regeneration for example, the type of development has to be carefully considered, and the risks should be mitigated and managed through location, layout, and design of the development to reduce flood risk to an acceptable level. Applicants are advised to carefully examine their development proposals to ensure consistency with the requirements of these Guidelines including carefully researching whether there have been instances of flooding or there is the potential for flooding on specific sites and to carry out a site-specific flood risk assessment.

In accordance with these Guidelines, a flood risk assessment had been carried out at the subject site to support the parent permission (Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24) which confirmed that the site is located in Flood Zone C and is therefore appropriate for residential development. The site has been assessed in accordance with the Flood Risk Management Guidelines, with appropriate mitigation measures proposed. However, the subject site would currently be considered low risk and as such the proposed development is not considered to be at an unacceptable risk of flooding in terms of industry best practice. Therefore, it is considered that the proposed development is consistent with the requirements of this national flood risk management policy.

1.12 Climate Action Plan, 2025

In accordance with the Climate Action and Low Carbon Development Act 2015, this Climate Action Plan, specifies the national strategy for the application of adaptation measures in different sectors and by local authorities in their administrative areas in order to reduce the vulnerability of the State to the negative effects of climate change and to avail of any positive effects that may occur. This Plan and its successors will set out the context to ensure local authorities, regions and key sectors can assess the key risks and vulnerabilities of climate change, implement climate resilience actions, and ensure climate adaptation considerations are mainstreamed into all local, regional, and national policy making.

The Climate Action Plan 2023 recognises that Ireland is making steady progress on our climate, however, it is also notes that significant improvements are needed to '*change Ireland for the better*'. The Plan highlights the 'Six Vital High Impact Sectors', which are as follows:

1. Powering Renewables.
2. Building Better.
3. Transforming how we travel.
4. Making family farms more sustainable.
5. Greening business and enterprise.

6. Changing our land use

The Plan warns that it is *‘essential that we act now to increase the rate of decarbonisation activities across all sectors of the economy.’* This will only be achieved through a change in lifestyles and business models, along with building effective and efficient neighbourhoods.

As such, the proposed development has taken into consideration the context of the site noting that it is not located within a vulnerable zone of flood risk. Therefore, proposing a high-quality residential development with significant access to green space, the provision of accessible roof terraces and green roofs (to help attenuate rainwater) with solar panels located over as required to meet the Energy Strategy and Building Regulations, and promoting a compact urban form for ‘less vulnerable areas’ is consistent with this Framework.

2.0 Regional Policy and Guidelines

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

- Regional Spatial and Economic Strategy (Eastern & Midland Regional Assembly)
- Transport Strategy for the Greater Dublin Area 2016-2035

2.1 Regional Spatial and Economic Strategy

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

The proposed development is located within the Dublin Metropolitan Area and the Dublin – Belfast Economic Corridor and the Dublin City and Suburbs settlement as identified in the strategy. The RSES includes an objective to prepare a Metropolitan Area Strategic Plan (MASP) to ensure a steady supply of serviced development lands throughout the City’s Metropolitan area to support Dublin’s Sustainable growth and continued competitiveness. The Strategy reiterates the NPF’s principle of compact and sustainable growth with a target of 30-40 % of new homes to be built on land within the built-up area. Within the Dublin City and Suburbs area, the RSES supports the consolidation and re-intensification of infill, brownfield, and underutilised sites through Regional Policy Objective 4.3, which also seeks to ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.

The RSES aims to deliver strategic development areas identified in the MASP, located at key nodes along high-quality public transport corridors in tandem with the delivery of infrastructure and enabling services to ensure a steady supply of serviced sites and to support accelerated delivery of housing. The MASP further supports the consolidation of Dublin City and Suburbs with a target of population of 1.65 million people in the area by 2031, an increase of 250,000 people or 18%.

The proposed development is designed to utilise a site in an urban context in close proximity to a variety of amenities and services. The proposed LRD, which provides for a density of 180 units/hectare, is located within a 10-minute walk from several existing bus services, planned BusConnects routes and the Greater Dublin Metropolitan Cycle Network, and therefore complies, in full, with the following policies:

“Regional Policy Objective (RPO) 5.2: Support the delivery of key sustainable transport projects including Metrolink, DART, and LUAS expansion programmes, BusConnects and the Greater Dublin Metropolitan Cycle Network, and ensure that future development maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, existing and planned.”

“Regional Policy Objective (RPO) 8.3: That future development is planned and designed in a manner which maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, both existing and planned and to protect and maintain regional accessibility.”

The proposed development will serve to regenerate an urban compact site and is supported by the following policy:

Regional Policy Objective (RPO) 3.2 – “Local Authorities, in their core strategy shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built-up area of Dublin City and Suburbs and at least 30% of all new homes within or contiguous to the built-up area of metropolitan settlements within the wider Dublin metropolitan area.”

As such, the proposed development will not only support the consolidation of the Firhouse area, but also provide with an influx of population which will further support the increased capacity needed for the expansion within the Dublin City Metropolitan area, as per infrastructure proposals within the RSES and MASP.

2.2 Transport Strategy for the Greater Dublin Area 2016-2035

This transport strategy provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA). The purpose of the Strategy is: *“To contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods.”*

The core of the strategy seeks the better integration of land use planning and transport planning. This can be achieved through the consolidation of development into higher order centres. In terms of the provision of housing, the strategy seeks to directly enable the sustainable development of strategically important residential sites, particularly in Metropolitan Dublin, where demand is highest.

The proposed development seeks to develop a strategic site within close distance of multiple bus networks, with a new BusConnects route proposed for the area, is considered an appropriate form of development in the context of supporting the vision and objectives of the Transport Strategy for the Greater Dublin Area 2016-2035.

3.0 Local Planning Policy

This section of the report provides an account of the relevant local planning policy framework pertaining to the application site and proposed development, all of which is contained within the adopted South Dublin County Council Development Plan 2022-2028.

3.1 South Dublin County Council Development Plan 2022-2028

3.1.1 Overarching Considerations

The subject site is located within the functional area of South Dublin County Council. The development of the site is therefore informed by the policies and objectives of South Dublin County Council Development Plan 2022-2028.

3.1.2 Land Use Zoning

Under the current South Dublin County Development Plan 2022-2028, the subject site is zoned 'LC-Local Centre', which seeks:

"To protect, improve, and provide for the future development of Local Centres."

The subject site is a brownfield site at the location of a former public house (no longer in use), along with an off-license, office, and barbershop. As such, the proposal to provide similar commercial units on site, will protect the existing use of the site, with the residential aspect and remaining commercial units proposed improving and providing the necessary amenities for the future development of Firhouse and its wider area.

Within this zoning, the following uses are 'Permitted in Principle':

"Advertisements and Advertising Structures, Bed & Breakfast, Betting Office, Car Park, Childcare Facilities, Community Centre, Cultural Use, Doctor / Dentist, Education, Enterprise Centre, Funeral Home, Garden Centre, Guest House, Health Centre, Home Based Economic Activities, Housing for Older People, Live-Work Units, Nursing Home, Offices less than 100 sq. m., Off-Licence, Open Space, Petrol Station, Place of Worship, Primary Health Care Centre, Public House, Public Services, Recreational Facility, Recycling Facility, Residential, Residential Institution, Restaurant / Café, Retirement Home, Shop-Local, Shop-Neighbourhood, Social Club, Veterinary Surgery, Work-Live Units."

As such the proposed development, comprising of 83 no. residential units, and commercial units is considered to be permitted in principle and consistent with the objectives of the pertaining zoning designations. It is also noted that, as requested, a number of residential units have been designed in such a manner that allows for them to adapt to a commercial use, should the need arise in the future for this to happen, therefore, further enhancing the proposals consistency with the zoning objective.



Figure 10. Land Use Zoning Map (subject site outlined in red)

The proposed development will build on the existing attributes within Firhouse through the introduction of 83 no. high-quality designed residential units with residential and community amenities including 1 no. betting office, 1 no. café, 1 no. medical unit, 1 no. office space, and 1 no. creche. It is therefore considered that the proposed development is consistent with the objectives of the 'LC – Local Centre' zoning designation.

It is noted that the southern section of the subject site is unzoned and will be reserved for public open space and to gain access to the site, along with the inclusion of the cycle route proposed by South Dublin County Council which is considered acceptable.

3.1.3 Core Strategy & Housing Strategy

The purpose of the Core Strategy is to articulate a medium-to-longer term quantitatively based strategy for the spatial development of the area of the Planning Authority and in doing so, to demonstrate that a Development Plan and its policies and objectives are entirely consistent with national and regional policies and strategies.

The 'vision' of the Core Strategy and Settlement Strategy is as follows:

"Maximise the potential of the County to deliver a compact settlement form in line with National and Regional population targets, with a strong focus on regeneration and the redevelopment of brownfield over greenfield lands."

Section 2.1 of the Plan further states:

“The promotion of a compact urban form of development is a central part of mitigating climate change. The policies and objectives of this Core Strategy seeks to provide for a consolidated urban form within existing settlements that are integrated with existing and planned public transport and the delivery of social and physical infrastructure. Such measures set the tone for the delivery of successful and sustainable communities within the County over the lifetime of this Plan and beyond.”

As per the Development Plans Core Strategy, it is estimated that there is an overall requirement of 15,576 units in the lifetime of the plan. There is a total land capacity of 428 hectares with the potential to accommodate 21,490 units. The Core Strategy further identifies that Templeogue, Walkinstown, Rathfarnham, and Firhouse have 103.38 hectares of lands, to accommodate 4,836 no. residential units.

Section 2.6.7 of the Core Strategy ‘Monitoring of Growth / Active Land Management’, sets out the following relative Objectives:

“CS3 Objective 1: To ensure that sufficient zoned land is available to satisfy the housing and population requirements of the County, as set out under the Ministerial Guidelines for Housing Supply and the Regional Spatial and Economic Strategy, over the lifetime of the Plan and to ensure that brownfield sites are prioritised for development over greenfield sites in line with the Regional Strategy.”

“CS3 Objective 3: To provide for flexibility in achieving the housing supply targets and meeting housing demand, the Council will consider the re-distribution of housing and population figures within the settlement and Neighbourhood Areas. In this regard, where a site is greater than 0.25ha. has the potential to exceed the allocation for a particular Neighbourhood Area as set out under the Core Strategy Table 11, the applicant must demonstrate to the Planning Authority that the proposal is aligned with the overall growth target for the County, any necessary investment in infrastructure and the provision of employment together with supporting amenities and services.”

“CS4 Objective 2: To promote the delivery of residential development through active land management measures and a co-ordinated planned approach to developing appropriately zoned lands at key locations, including regeneration areas, vacant sites, and under-utilised areas.”

“CS5 Objective 3: To support mixed use employment activities in our urban areas in accordance with the settlement and retail hierarchies.”

“CS6 Objective 4: To promote higher densities (50+ units per hectare) subject to meeting qualitative standards at appropriate locations, in urban built-up areas, especially near urban centres and/or high-capacity public transport nodes in line with prevailing Section 28 Ministerial Guidelines and where it can be demonstrated that the necessary infrastructure is in place or can be provided to facilitate the development.”

“CS6 Objective 5: To design future development in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive, universally-accessible street environment for pedestrians and cyclists, where adequate transport links are in place, or will be situated, close to new developments and, insofar as possible, to existing developments which need them.”

The subject site in Firhouse measures c. 0.46 ha and is located in a ‘Neighbourhood Area’, alongside Templeogue, Walkinstown and Rathfarnham. The unit allocation for these areas collectively is 1,677 no. units for the period of 2022-2028. The proposed development includes 83 No. residential units, which will contribute to the overall allocation and is highly unlikely to exceed the allocations for this particular area.

The subject site is brownfield in nature and the application seeks to deliver a mixed-use, primarily residential, development on underutilised lands which are appropriately zoned ‘LC – Local Centre’. The proposed development, therefore, complies with the above policy objectives of the Plan.

Section 2.6.8 of this Chapter focuses on ‘Employment Lands’ and aims to ensure that sufficient lands are identified for employment purposes at suitable locations, taking proper account of national planning policies. Within the Plan, it is estimated that there is a total land capacity of 627 hectares to facilitate further employment, in the County; 58.27 hectares of which are located in Local, Village, Districts, and Town Centres (LC, VC, DC, and TC zoning).

The proposed development includes a mix of uses (betting office, café, medical unit, office space, and creche) which will generate a number of jobs on ‘Local Centre’ zoned lands and therefore complies with the following policy objective:

“CS5 Objective 3: To support mixed use employment activities in our urban areas in accordance with the settlement and retail hierarchies.”

Section 2.7 ‘Settlement Strategy’ of the Plan sets out the function and role of each settlement within the County. Table 14 ‘RSES Settlement Hierarchy relating to South Dublin County Council’ of the Plan identifies that Firhouse is a neighbourhood area within Dublin City and Suburbs. As such, the Plan states *‘In accordance with the principles of sustainable development, and NPO 3b of the NPF; future growth within the County will be prioritised in the Dublin City and Suburbs area first to encourage population growth close to existing and planned employment, services, key transport infrastructure and local amenities. This will ensure a critical mass of people to continue the viability of such services. In this regard, higher densities should be applied to the Dublin City and Suburbs settlement with a graded reduction in the lower-level settlements in line with prevailing Ministerial Guidelines.’*

Section 2.7.1 of the Plan focuses on ‘Dublin City and Suburbs’ and refers to the ‘Wider Dublin City and Suburbs Area’ in which the subject site is located. The following is stated:

‘A key component of this Development Plan is to support the consolidation of the key urban areas with more local day to day services focused on the existing villages, district centres and local centres. It is envisaged that the development of the wider settlement area will largely be provided for through infill and brownfield growth.... As the suburbs of Dublin developed, so new local and district centres were formed, each with their own identity and sense of place

supporting the residential areas. Such areas include Knocklyon, Edmondstown, Ballyboden, Firhouse, Ballyroan, Ballycullen, and those parts of Greenhills and Walkinstown which are within South Dublin but straddle the County boundary.'

The proposed development will deliver new residential accommodation and commercial uses on an underutilised site that has been zoned as 'Local Centre' for a number of years. The subject site is in close proximity to existing bus services (which is being vastly improved through the roll-out of BusConnects), local extensive public parks, local sports clubs and existing schools within the Firhouse/Knocklyon Area.

The Core Strategy of the Plan seeks to focus development on suitable strategic nodes along existing or planned public transport corridors. The subject lands comprise a strategically located, underutilised, site within the Dublin Metropolitan area and is identified as being located within the 'Dublin City and Suburbs' settlement boundary and is also in close proximity to Tallaght and is easily accessed via the M50 National Motorway. The proposed residential development will have a gross density of c. 180 units per hectare and will provide an appropriate mix of unit types and sizes, in addition to non-residential uses, high quality open space and public realm and a childcare facility and is considered to be consistent with the Core Strategy of the Plan.

3.1.4 Natural, Cultural, and Built Heritage

As set out within the Plan, South Dublin County is seeking to *"protect, conserve, and enhance the County's natural, cultural and built heritage, supporting its sensitive integration into the development of the County for the benefit of present and future generations."* The Plan sets out the following objective:

"NCBH1 Objective 1: To protect and enhance natural, cultural, and built heritage features, seeking opportunities to identify, retain, protect, and incorporate heritage assets into plans and development."

The application site is void of any natural features which would support trees and hedgerows and wildlife habitats. It is also submitted that none of the buildings/structures are of cultural or heritage significance. All buildings on site are largely vacant and in need of extensive repair, save for the barber shop and betting office which currently occupies in the western building and will be accommodated within the proposed development. This has also been deemed acceptable within the parent permission on site, Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24, in which clearance work has begun on site to cater for the proposed development. This clearance work was monitored by a suitably qualified professional and adhered to best practice standards.

In relation to biodiversity, the Plan seeks to *"protect, conserve, and enhance the County's biodiversity and ecological connectivity having regard to the national and EU legislation and Strategies."* This is set out in conjunction with the Plan's policies on Natura 2000 sites in which it is stated to *"Conserve and protect Natura 2000 sites and achieve and maintain favourable conservation status for habitats and species that are considered to be at risk through the protection of the Natura 2000 network from any plans or projects that are likely to have a significant effect on their coherence or integrity."* An Appropriate Assessment screening had previously prepared by Flynn Furney Environmental Consultants and submitted with the previous permission on site (Reg. Ref. LRD24A/0001), which, in

summary, concluded that the proposed development, individually and in combination with other plans and projects is not likely to have any significant effects on any European sites. South Dublin County Council are invited to refer to this AA screening submitted with the LRD application for the subject site, with the applicant confirming that an updated AA screening will be prepared for Stage 3 of the application. It is also submitted that the proposed green open space proposed within the application will integrate with the existing, vast green infrastructure within the area, providing opportunities to strengthen the green infrastructure and biodiversity of the site through SuDS features and the provision of tree pollinator-friendly planting. It is also noted that given the existing hardstanding surface on this brownfield site, the proposed development will have a significant Green Infrastructure net gain through various landscaping proposals and planting, including the addition of green roofs.

The County Development Plan sets out the protect habitats and species of the County, and sets out the following policy and objective:

“Policy NCBH5: Protect and promote the conservation of biodiversity outside of designated areas and ensure that species and habitats that are protected under the Wildlife Acts 1976 to 2018, the Birds Directive 1979 and the Habitats Directive 1992, the Flora (Protection) Order 2015, and wildlife corridors are adequately protected.”

“NCBH5 Objective 1: To ensure that development does not have a significant adverse impact on biodiversity, including known rare and threatened species, and that biodiversity enhancement measures are included in all development proposals.”

“NCBH5 Objective 2: To ensure that an Ecological Impact Assessment is undertaken for developments proposed in areas that support, or have the potential to support, protected species or features of biodiversity importance, and that appropriate avoidance and mitigation measures are incorporated into all development proposals.”

An ecological impact assessment (EclA) was undertaken by Flynn Furney Environmental Consultants and an Environment Impact Assessment (EIA) report with both found within the previous LRD application submitted previously on site (Reg. Ref. LRD24A/0001). As set out within the report, the proposed development will support the protection of species and features of biodiversity importance with mitigation measures incorporated into all development proposals, to ensure this.

The Plan notes the ecological value of the Dodder River Valley within the County, and its connections to the wider Dublin area, before entering the Irish Sea at the Grand Canal Basin in Ringsend. The Plan recognises the significant historical, archaeological, and cultural importance of the river and as such it seeks to *“Protect and enhance the visual, recreational, environmental, ecological, geological, and amenity value of the Dodder Valley, as a key element of the County’s Green Infrastructure network.”* Within this regard, the Plan sets out the following objectives:

“NCBH8 Objective 2: To ensure that development within the Dodder Valley will not prejudice the future creation and development of further interconnected public parklands along The River Dodder.”

“NCBH8 Objective 3: To recognise the key role the Dodder River plays as an ecological corridor and a provider of ecosystem services in the County’s Green Infrastructure, by facilitating and

supporting the continued development of the Dodder Valley (Zoning Objective 'HA-DV') as a linear park, greenway, and an area of high amenity, recreational, heritage, geology, biodiversity, and conservation value."

It is noted that the subject site is on lands zoned 'LC – Local Centre' adjacent to the 'HA-DV' zoning sites, circa. 150m from The River Dodder. The previous LRD application submitted in 2024 was accompanied by an extensive suite of assessments which demonstrates the proposed development will not negatively impact the visual, recreational, environmental, ecological, geological and amenity value of the Dodder Valley. It is therefore respectfully submitted that the proposed development will not have any significant impact on The River Dodder. A range of similar reports have been prepared to accompany the subject, Stage 3 LRD Planning application which South Dublin County Council are invited to refer to.

With regards to Geological sites within the County, the Development Plan seeks to *"maintain the conservation value and seek the sustainable management of the County's geological heritage resource."* As such, the following objective is set out:

"NCBH12: To protect identified County Geological Sites from inappropriate development, avoiding potential conflicts with other ecological and cultural assets by engaging in consultation, and to promote the importance and potential of such sites through the County's Heritage Plan."

It is noted that an area of geological interest, known as the 'Dodder Terraces', is located in close proximity to the site and also straddle the north and western boundaries of the site. It is submitted that the proposed development will not infringe on the geological heritage site. OCSC Consulting Engineers have analysed the site location, regarding areas of geological interest. The nearest area of geological heritage is the Dodder Terraces (site code SD004) which is located beyond the north and west boundary of the site. The site does not lie within the designated area and will not impact on its heritage.

It is noted that there is an area zoned 'To Protect and Preserve Significant Views', looking across from the N81 across Riverbank with views of the Wicklow Mountains. Within the Development Plan, it is a policy to *"Preserve Views and Prospects and the amenities of places and features of natural beauty or interest including those located within and outside the County."* In this regard, the following objectives are set out:

"NCBH15 Objective 1: To protect, preserve and improve Views and Prospects of special amenity, historic or cultural value or interest including rural, river valley, mountain, hill, coastal, upland and urban views and prospects that are visible from prominent public places and to prevent development which would impede or interfere with Views and / or Prospects."

"NCBH15 Objective 2: To require a Landscape / Visual Assessment to accompany all planning applications for significant proposals that are likely to affect views and prospects."

As such, as part of the previous LRD application, Digital Dimensions had provided verified photomontages of the proposed development, including a view from the area designated for protection. As could be seen from these images, the proposed development will not impact on the designated protected view and as such is deemed appropriate development given the site location.

With the subject application now providing a decrease in its height, of the previous assessment's height, as per the Board Order (ABP Ref. 319568-24), it can be confirmed that the proposal will not impact on the designated protected view. Digital Dimensions have prepared Verified Views of the subject proposal which has been submitted under separate cover of this application.

It is therefore respectfully submitted, that the proposed development is in compliance with all relevant policies and objectives set out within Chapter 3 'Natural, Cultural & Built Heritage' of the Development Plan.

3.1.5 Green Infrastructure

Chapter 4 of the Development Plan focuses on Green Infrastructure within the County and sets out the following vision:

"Promote the development on an integrated GI network for South Dublin County working with and enhancing existing biodiversity and natural heritage, improving our resilience to climate change and enabling the role of GI in delivering sustainable communities to provide environmental, economic, and social benefits."

The Plan states that the provision of good Green Infrastructure from a placemaking perspective is an "asset that can raise the profile of the County... and encourage people to live and work in the County." The overarching Policy of the County is to "Protect, enhance, and further develop a multifunctional GI network, using an ecosystem services approach, protecting, enhancing, and further developing the identified interconnected network of parks, open spaces, natural features, protected areas, and rivers and streams that provide a shared space for amenity and recreation, biodiversity protection, water quality, flood management and adaptation to climate change." In this regard, the Plan sets out the following relevant objectives:

GI1 Objective 3: *To facilitate the development and enhancement of sensitive access to and connectivity between areas of interest for residents, wildlife and biodiversity, and other distinctive landscapes as focal features for linkages between natural, semi natural, and formalised green spaces where feasible and ensuring that there is no adverse impact (directly, indirectly or cumulatively) on the conservation objectives of Natura 2000 sites and protected habitats outside of Natura 2000 sites."*

GI1 Objective 4: *To require development to incorporate GI as an integral part of the design and layout concept for all development in the County including but not restricted to residential, commercial and mixed use through the explicit identification of GI as part of a landscape plan, identifying environmental assets and including proposals which protect, manage and enhance GI resources providing links to local and countywide GI networks."*

GI2 Objective 1: *To reduce fragmentation and enhance South Dublin County's GI network by strengthening ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional network by connecting all new developments into the wider GI Network.*

GI2 Objective 2: *To protect and enhance the biodiversity and ecological value of the existing GI network by protecting where feasible (and mitigating where removal is unavoidable)*

existing ecological features including tree stands, woodlands, hedgerows and watercourses in all new developments as an essential part of the design and construction process, such proactive approach to include provision to inspect development sites post construction to ensure hedgerow coverage has been protected as per the plan.”

As part of this application, Jane McCorkell Landscape Architects have prepared landscaping drawings which outlines how the proposed development is compliant with the Green Infrastructure policies. There is no existing vegetation on site and was previously laid out as an impermeable asphalt paved car park and buildings, with no extant planting on the site. However, along the north/north-western site boundary of the subject site, a group of mature trees is established in the adjacent site of Ballyboden GAA, comprising a visually prominent and of high public amenity value. We note however, that some of those trees have been removed and this is reflected in the updated plans and particulars submitted within this current application. The proposed open space, together with its connectivity with the existing open space, particularly to the north of the site, will significantly enhance the green infrastructure network in the local area. Given the existing hardstanding, the proposed development will have a significant Green Infrastructure net gain. The proposed development includes multiple green infrastructure elements in the proposal, including various tree planting, landscape boundary treatment, and green roof proposal. South Dublin County Council are invited to refer to the Arboricultural Report prepared by Charles McCorkell Arboricultural Consultancy and submitted with the parent permission (Reg. Ref. LRD24A/0001), and the landscape drawings prepared by Jane McCorkell Landscape Consultants for further details on how the existing trees and biodiversity of the site will be retained and protected.

As per **Policy GI4** of the Development Plan:

“Require the provision of Sustainable Drainage Systems (SuDS in the County and maximise the amenity and biodiversity value of these systems.”

As part of the development, it is proposed to incorporate SuDS measures into the subject development such as, green / blue roofs where feasible (on flat roof areas), blue roof system to the basement podium at ground floor level, infiltration trenches within the public realm areas to the south and east of the building, tree pits and raingarden areas to the public realm areas, and permeable surface paving and subsurface attenuation layer. Full details on the proposed SuDS measures within the site can be found within the enclosed engineering and landscaping packs submitted under separate cover of the application.

With regard to the relationship of Green Infrastructure and human health and wellbeing, it is a policy of the council to *‘Improve the accessibility and recreational amenity of the County’s GI in order to enhance human health and wellbeing while protecting the natural environment within which the recreation occurs.’* As such, the Plan sets out the following objectives:

“GI6 Objective 3: *To provide accessible, attractive, and safe routes linking settlements to the GI network of the County.”*

“GI6 Objective 5: *To support the provision of new walkways and cycleways in suitable locations to improve the recreational amenity of GI corridors in a manner that does not compromise the ecological functions of the corridors.”*

GI6 Objective 6: *To minimise the environmental impact of external lighting within the GI network to achieve a sustainable balance between the recreational needs of an area, the safety of walking and cycling routes and the protection of light sensitive species such as bats.”*

As previously mentioned, the subject site is void of any vegetation and the proposed development will provide large areas of accessible recreational amenity space to be enjoyed by future residents of the scheme and the local community. The proposed landscape design proposes a simple, resilient, and legible streetscape and sequence of open spaces with a clear hierarchy to settle the 2-no. proposed residential buildings into the receiving environment. The proposal includes the planting of primarily indigenous species. Linking of open spaces and recreational areas with planted buffer areas will contribute to extending a ‘green network’ of mosaic spaces, stepping-stones and ecological corridors for wildlife habitat and commuting animals. It is also submitted that the design of the public lighting proposed has been carefully considered to ensure bat species within the area are not adversely affected. It is therefore respectfully submitted that the proposed development complies with the above relevant policies and objectives of the Development Plan. For further information on all proposed landscaping within the site, the Council are invited to refer to the landscaping drawings prepared by Jane McCorkell Landscape Consultants submitted under separate cover.

Within the adopted County Development Plan, South Dublin County Council have introduced a **Green Space Factor (GSF)** which must be implemented in all new developments. As stated within the Plan *“The GSF is a measurement that describes the quantity and quality of landscaping and GI across a defined spatial area.”* The implementation of the GSF seeks to ensure new developments meet minimum standards and secure a *‘positive contribution to biodiversity, amenity, air quality, stormwater management, temperature regulation, and other ecosystem services.’*

Within the previous application on site, Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24, a Green Space Factor worksheet was prepared which confirmed that the proposal met the requirements of green space provision, given the hardstanding nature of the existing site. Jane McCorkell Landscape Architects have now provided an updated Green Space Factor worksheet to accompany the subject application. The subject development will have a significant Green Infrastructure net gain, given the current hardstanding brownfield site that it is. The proposed development includes multiple green infrastructure elements in the proposal, including various tree planting, landscape boundary treatment, and green roof proposal. South Dublin County Council are invited to refer to the relevant engineering and landscaping drawings and reports submitted under separate cover for further details.

3.1.6 Quality Design and Healthy Placemaking

The vision of Chapter 6 of the Development Plan is to *“Create a leading example in sustainable urban design and healthy placemaking that delivers attractive, connected, vibrant and well-functioning places to live, work, visit, socialise and invest in.”* The Development Plan further states that South Dublin County seeks to *“Support the development of successful and sustainable neighbourhoods that are connected to and provide for a range of local services and facilities.”* In this regard, the Plan sets out the following relevant objectives:

“QDP1 Objective 1: *To ensure that residential development contributes to the creation of sustainable communities in accordance with the requirements of the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) (or any*

superseding document) including the urban design criteria as illustrated under the companion Urban Design Manual – A Best Practice Guide, DEHLG (2009). “

“QDP1 Objective 2: To ensure that residential, mixed use and employment development provides an integrated and balanced approach to movement, placemaking and streetscape design in accordance with the requirements of the Design Manual for Urban Roads and Streets, DTTAS and DEHLG (2013 as updated).”

“QDP1 Objective 3: To protect the quality, ambiance, vibrancy and vitality of urban centres by promoting an appropriate mix of complementary and compatible day and night-time uses, including commercial, recreational, civic, cultural, leisure and residential uses.”

“QDP1 Objective 4: To reinforce the network of urban centres as the appropriate locations for new mixed-use development, ensuring that the existing context including identified built and natural assets, urban design, integration and potential for connectivity fully informs development.”

“QDP1 Objective 5: To promote the re-development of underutilised Local Centres within the County as new mixed use neighbourhood hubs continuing to provide for local retail and services in a manner which respects and consolidates the existing urban character of these areas ensuring adherence to the eight key design principles in ‘The Plan Approach’ including quality of design, integration, accessibility, and connections to the surrounding areas.”

The proposed development has been designed fully in accordance with the ‘Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas’ and provides an array of facilities to support the new community and provide for the existing community. This includes local retail provision, services, and public open space. The proposed development includes an appropriate mix of complementary and compatible day and evening uses, including commercial, retail, and residential uses. The application proposes to re-develop an underutilised site which is zoned LC (Local Centres) with a new mixed-use neighbourhood which will provide for local retail and services in a manner which respects and consolidates the existing urban character of the area. South Dublin County Council are invited to refer to the Housing Quality Assessment and Urban Design Statement for full details on compliance with the relevant guidelines.

With regards to Neighbourhood context, the Plan seeks to *“Support and facilitate proposals which contribute in a positive manner to the character and setting of an area.”* It is aimed to achieve this by setting out the following Objectives:

“QDP3 Objective 1: To ensure new development contributes in a positive manner to the character and setting of the immediate area in which a proposed development is located taking into consideration the provisions set out in Chapters 3 and 4 of this Plan and having regard to the requirements set out in Chapter 12: Implementation and Monitoring in relation to design statements.”

“QDP3 Objective 3: To promote and adhere to design standards and densities in village centres that are informed by the surrounding village and historic context and enhance the specific characteristics of each town or village in terms of design, scale, form and external finishes.”

“QDP3 Objective 6: To ensure that higher buildings in established areas respect the surrounding context and take account of heights and their impact on light and the negative impact that they may have on existing communities to ensure consistency with regard to Healthy Placemaking.”

The proposed development seeks to respond in a positive manner to the existing character and setting of the immediate area. The taller elements of the proposed development will also respect the surrounding context through the proposed stepping-down of the building height at the north-eastern corner to respect the residential amenity at Mount Carmel Park. It is also proposed to provide all commercial elements along the southern elevation, facing onto Firhouse Road to provide a commercial frontage which has been acceptable within the previous application on site. South Dublin County Council are invited to refer to the Architectural Design Statement, prepared by OMP Architects for further details on the design proposal and how it integrates with the existing neighbourhood.

It is submitted that the proposed development, including its layout and connections to adjoining lands, afford future residents' proximate access to services and facilities in the area and promote sustainable modes of transport, primarily pedestrian and cyclist connections through the site to adjoining lands. Thus, the proposed development assists South Dublin County Council in achieving its '10-minute settlements', which promotes a *'more compact development form, sustainable movement, and ease of access to services, community facilities, jobs, and amenities'*.

With regards to public realm, the Plan looks to *"promote a multi-disciplinary and co-ordinated approach to the delivery and management of the public realm within South Dublin County."* It is respectfully submitted that the proposed development will contribute positively to the creation of new, and the enhancement of the existing public realm which currently comprises primarily hardstanding car park at the subject site. It is proposed that the public realm within the development will enable the community to enjoy a healthy living environment within the site, while also enhancing the adjoining, existing public realm within the area. South Dublin County Council are invited to refer to the landscaping and architectural drawings submitted under separate cover, for further details on the proposed public realm as part of the application.

The Architectural Drawings, Design Statement, and Housing Quality Assessment, prepared by OMP Architects, gives a complete, comprehensive, overview of how the proposed development is compliant with all necessary national, regional, and local guidelines in terms of development, building height, design, density, and mix of dwellings. South Dublin County Council are invited to refer to the architectural pack, submitted under separate cover for further details.

3.1.7 Housing

Chapter 6 of the Development Plan focuses on Housing in the County and sets out the following vision:

"Ensure the delivery of high quality and well-designed homes in sustainable communities to meet a diversity of housing needs within the County."

The key focus of this chapter is setting out suitable policies and objectives to assist the County in achieving its housing need and reaching the Housing Need and Demand Assessment results. Such examples of these objectives are as follows:

“H1 Objective 2: To require that 20% of lands zoned for residential use, or a mixture of residential and other uses for development of 5 or more units or development of units on land greater than 0.1 hectares (or relevant figures as may be revised by legislation) be reserved for social and affordable housing in accordance with the Affordable Housing Act 2021 and the Planning and Development Act 2000 (as amended).”

It is proposed, as part of this application, to provide 20% of the units as social housing as per the Part V agreement with South Dublin County Council. The applicant is currently engaging with South Dublin County Council through compliance submissions of Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24, to provide an appropriate provision of Part V units.

“H1 Objective 7: To ensure population growth and increased housing densities take place within and contiguous to Dublin City and Suburbs and the County’s town boundaries suited to their strategic regional role, subject to good design and development management standards being met.”

“H1 Objective 8: To promote the re-use of and reactivation of vacant units within our Urban Areas and pursue as soon as possible, through the application of the vacant site levy in accordance with the Urban Regeneration and Housing Act 2015, and through the implementation of the South Dublin Vacant Homes Strategy and Action Plan 2018-2021. The Council shall review and update this programme as deemed necessary and shall pursue the Compulsory Purchase of long-term vacant sites and units, where feasible.”

A residential density of circa 180 units per hectare is proposed, with an appropriate mix of units within the development. The proposed development inherently complies with the overarching themes of the NPF by proposing a compact well-designed sustainable form of residential development on an underutilised suburban site located in close proximity to a range of social and commercial facilities and public transport services. The development therefore accords with the NPF’s aims to consolidate Dublin through the development of underutilised, brownfield sites. The scale and locational characteristics of the subject site, therefore, provides an opportunity for a sustainable, higher density, residential development, and the delivery of much-needed housing. Within the previous assessment of An Bord Pleanála on the parent permission, ABP Ref. 319568-24, a density of 170 units per hectare was considered acceptable, and as such, this minor uplift of only 5 no. additional units is also considered acceptable, given the surrounding development and site’s accessibility.

“H1 Objective 12: Proposals for residential development shall provide a minimum of 30% 3-bedroom units, a lesser provision may be acceptable where it can be demonstrated that:

- there are unique site constraints that would prevent such provision; or*
- that the proposed housing mix meets the specific demand required in an area, having regard to the prevailing housing type within a 10-minute walk of the site and to the socioeconomic, population and housing data set out in the Housing Strategy and Interim HNDA; or*
- the scheme is a social and / or affordable housing scheme.”*

This objective has now been superseded by the Planning and Design Standards, 2025, in which no specific unit mix is required. As such, the subject application will provide for predominantly 1- and 2-bedroom units, as well as studio units which is considered to comply with the revised Planning and Design Standards.

H1 Objective 13: *To support the provision of a mix of tenure types across the County in creating suitable accommodation for all in promoting sustainable and mixed income communities and discourage an over proliferation of a single tenure (whether private owner occupier, private rental, social rental or affordable purchase and rental) within any local area (within a 10-minute walking distance) or Local Electoral Area, in line with the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (December 2020) and the provisions of the Housing Strategy and Interim HNDA or any subsequent future Regional based HNDA."*

With regards to design and layout, the County Development Plan seeks to *"Promote high quality design and layout in new residential developments to ensure a high-quality living environment for residents, in terms of the standard of individual dwelling units and the overall layout and appearance of the development."* It is aimed to achieve high-quality developments through incorporating *"energy efficiency measures and promote innovation in renewable energy opportunities"* and supporting the *"principle of permeability schemes that provide improved connections between housing estates and their surrounds for walking and cycling."* The Council are invited to refer to the Urban Design Statement, prepared by OMP Architects, which demonstrates how the proposed layout and design, conforms with the best practice, as required under the Development Plan.

With regards to Public Open Space, the Development Plan seeks to *"Ensure that all residential development is served by a clear hierarchy and network of high quality public open spaces that provide for active and passive recreation and enhances the visual character, identity and amenity of the area."* In this context, the Plan sets out the following Objectives:

"H8 Objective 1: *To ensure that public open space in new residential developments complies with the quantitative and qualitative standards set out in Section 8.7 of Chapter 8: Community Infrastructure and Open Space and Chapter 12: Implementation and Monitoring."*

"H8 Objective 3: *To enhance the recreational value of open spaces that serve existing residential areas as part of any future infill developments or where appropriate provide for the upgrade of other parks in the immediate area (applying the 10-minute concept) through a financial contribution in lieu, where a proposed development is not capable of providing the full open space standards on site."*

The proposed development shall include public open space provision, as per the previous application permitted under Reg. Ref LRD24A/0001 and is therefore in compliance with the minimum public open space standard for residential development. It is also noted, given the site location of the development, there is a generous public open space and high-quality public realm provided within easy walking distance of the site at the Dodder Valley Park. It is therefore respectfully considered that sufficient public open space is provided. In relation to private open space, the Plan looks to *"ensure that all dwellings have access to high quality private open space and semi-private open space (where*

appropriate) and that such space is carefully integrated into the design of new residential developments.” The Plan sets out the following objective:

“H9 Objective 2: *To ensure that the design and layout of new apartments, or other schemes as appropriate, ensures access to high quality and integrated semi-private or communal open space that supports a range of active and passive uses.”*

Within the proposed development, all apartments will have access to their own high-quality private balconies or terraces, with further communal open spaces provided within the development, all in accordance with the national requirements. South Dublin County Council are invited to refer to the Housing Quality Assessment and Architectural drawings, prepared by OMP Architects, for further details on how the private and public open spaces provided are compliant with the relevant requirements.

Within Section 6.8 of the Plan, it is stated that the Development Plan looks to *“Promote and support residential consolidation and sustainable intensification at appropriate locations, to support ongoing viability of social and physical infrastructure and services and meet the future housing needs of the County.”* The following objectives have been set out within the Plan:

“H13 Objective 1: *To promote and support residential consolidation and sustainable intensification at appropriate locations and to encourage consultation with existing communities and other stakeholders.”*

“H13 Objective 2: *To maintain and consolidate the County’s existing housing stock through the consideration of applications for housing subdivision, backland development and infill development on large sites in established areas, subject to appropriate safeguards and standards identified in Chapter 12: Implementation and Monitoring.”*

“H13 Objective 4: *To promote and encourage ‘Living-Over-The-Shop’ residential uses on the upper floors of appropriate buildings located in Town, District, Local and Village Centres within the County save for public houses and nightclubs and other inappropriate places where similar business is conducted.”*

The application will seek to develop an infill site with a mixed-use, primarily residential development, measuring c. 0.46 hectares in an established area which will utilise existing infrastructure and services. The proposed development provides for an appropriate residential density and has been designed to provide a good level of residential amenity for future residents of the scheme, in addition to preserving the existing residential amenity of adjoining residents. It is also noted that the development also proposes a commercial aspect to the site, which will support the ‘Living-Over-the-Shop’ narrative, providing a sustainable development. It is respectfully submitted therefore that the proposed development complies with all relevant policies and objectives of the County Development Plan in relation to housing.

3.1.8 Community Infrastructure and Open Space

The development plan sets out the following vision for community infrastructure and open space:

“The creation of healthy, inclusive, and sustainable communities where all generations have local access to social, community, and recreational facilities, and parks and green spaces, to suit their needs.”

It is stated that the creation of sustainable, healthy, and socially inclusive neighbourhoods ‘is one of the cross-cutting themes of the County Development Plan.’ The Plan notes that provision of appropriate social infrastructure across the County will be a priority to ensure good, sustainable neighbourhoods are provided for both existing and future residents.

With regards to Open Space, the Plan sets out the following policies and objectives:

“Policy COS5: *Provide a well-connected, inclusive, and integrated public open space network through a multi-functional high-quality open space hierarchy that is accessible to all who live, work and visit.”*

“COS5 Objective 1: *To support a hierarchy of multi-functional, accessible parks and public open spaces across the County in line with Table 8.1, based on existing populations and planned growth in accordance with the overall standard of 2.4ha. per 1,000 populations.”*

“COS5 Objective 19: *To support the provision within new residential developments and parks and public open spaces, of formal and informal play areas with appropriate equipment and facilities, incorporating nature-based play opportunities where appropriate, ensuring that the needs of different age groups including young children, older children and teenagers are catered for and that different abilities and needs are accommodated to be able to access and participate in play, and to ensure play spaces and play facilities comply with universal design principles.”*

Table 8.2 Public Open Space Standards:

New Residential Development on lands in Other Zones including mixed-use	Minimum 10% of site area.
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The proposed development includes a high quality, public open space, along Firhouse Road and to the northeast corner of the application site. The apartment units will also be served by dedicated communal open spaces located centrally between the blocks and at roof terrace levels. A clear hierarchy of open space is provided for. With regards to the 10% requirement, based on the size of the site, this would equate to a requirement for c. 460 sqm. It is confirmed that sufficient public open space shall be provided within the development, as per the previously permitted scheme under Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24. The public open space adjacent to Firhouse Road and Mount Carmel Park shall provide various measures including planted landscape buffers; improved biodiversity; amenity tree, shrub, ornamental grass, bulb, and perennial planting; a path to the front of the development’s elevations; natural SuDS stormwater attenuation; and play-along-the-way provisions for all ages and abilities. Full details on the proposed play spaces can be found in the landscaping drawings prepared by Jane McCorkell Landscape Consultants and submitted under separate cover.

It is also noted that the subject site is located immediately adjacent a generous public open space and high-quality public realm, in the form of the Dodder Valley Park. This Park is noted as 1 of 4 Regional Parks in the County, providing high-quality amenity to the surrounding residents. It is therefore respectfully submitted that sufficient open space is provided for within the subject site and its immediate surroundings.

With regards to Community and Social Infrastructure, the following objectives and policies are of relevance:

“COS6 Objective 1: To facilitate the development of community-based care including primary health care centres, hospitals, clinics, and facilities to cater for the specific needs of an ageing population in appropriate urban areas in accordance with the Development Plan core and settlement strategy, consistent with RPO 9.23 of the RSES.”

The proposed development includes the provision of a medical unit on the ground floor of Block 02 to cater for both future and existing residents of the area.

“COS7 Objective 2: To require a provision of appropriate childcare facilities as an essential part of new residential developments in accordance with the provisions of the ‘Childcare facilities Guidelines for Planning authorities (2001)’, or any superseding guidelines, or as required by the Planning Authority. The Guidelines recommend one childcare facility with a minimum of 20 places for each 75 units for new residential developments, with any variations to this standard being justified having regard to factors such as type of residential units, emerging demographic, and availability of existing childcare services in the vicinity.”

The proposed development seeks to provide a creche facility on the lower ground floor level of Block 01, at the northeast section of the site, with an associated outdoor play area to the rear. With a total of 83 no. units proposed within the site, the development should provide 33 no. spaces; however, it is noted that the guidelines states that studio and 1-bedroom units are not taken into the equation. The proposed creche, providing a total of 22 no. spaces, therefore is deemed acceptable within the development. The applicant has also been engaging with South Dublin County Council through compliance submissions under Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24, to agree on a design layout of this creche.

It is respectfully submitted that the provision of 1 no. barbershop, 1 no. betting office, 1 no. café, 1 no. medical unit, 1 no. office space, and 1 no. creche, within the proposed development provides for the necessary social infrastructure required to facilitate the future population of the area, arising from the proposed development. South Dublin County Council are invited to refer to the Architectural Urban Design Statement, prepared by OMP Architects for greater details on the proposed commercial facilities within the development.

3.1.9 Building Height and Density Guide

Appendix 10 of the County Development Plan sets out the County’s Building Height and Density Guide. As stated within the guide, the document has the following two purposes:

“1. To address the requirement under SPPI1 of the Urban Development and Building Height Guidelines (2018) and the need for planning authorities to explicitly identify, through their

statutory plan, areas where building height will be actively pursued for redevelopment, regeneration, and infill development; and

2. To provide a toolkit for the assessment of proposed increased building heights in development application and development management scenarios.”

With regard to higher densities and placemaking, the plan states that, *“higher densities support good placemaking because with increased human occupation of the urban area comes increased ridership for public transport infrastructure and increased footfall to support non-residential uses that lend vibrancy to our towns and villages. The critical mass that results from increased density cannot be underestimated in the contribution it makes to the vitality of the urban area.”* As such, it is submitted that the proposed development, located on lands zoned ‘LC-Local Centre’ and in proximity to high-quality public transport systems, can accommodate higher heights and densities as it would add to not only the future commercial development, but also the wider suburban area of Firhouse.

DOWNEY also notes that within South Dublin County Council’s assessment of the previous application on site, Reg. Ref. LRD24A/0001, the previous development was deemed acceptable, and within An Bord Pleanála’s assessment of the application, ABP Ref. 319568-24, it was also deemed acceptable, subject to Condition 3 which was to remove the 3rd floor units, resulting in an overall provision of 78 no. units and a density of 170 units per hectare. Within the subject application, permission is being sought for a minor uplift to 83 no. units and a density of 180 units per hectare which is considered acceptable from a planning perspective and is also viable from an operational and construction perspective. As per national planning guidelines and policies, there is an emphasis placed on increasing housing densities within the existing built-up area of Dublin City and Suburbs. As such, the provision of 83 no. units located within the area of Firhouse, in close proximity to a number of residential and social infrastructure, and accessed by high-quality active transport infrastructure, is therefore considered acceptable.

3.1.10 Development Management Standards

Chapter 12 (Implementation and Monitoring) of the South Dublin County Development Plan 2022-2028 sets out the development standards and criteria that arise out of the policies and objectives of the County Development Plan, to ensure that development occurs in an orderly and efficient manner and that is in accordance with proper planning and sustainable development.

Table 5. Compliance with South Dublin County Council Development Management Standards

Objective	Compliance
12.3 Natural, Cultural, and Built Heritage	
12.3.1 Appropriate Assessment	An Appropriate Assessment Screening report had previously been carried out by Flynn Furney Environmental Consultants as part of the LRD planning application which the Council are invited to refer to, confirming no adverse impacts from the proposed development. An updated AA screening has also been

	prepared to accompany the subject application and is submitted under separate cover.
12.3.2 Ecological Protection	Flynn Furney Environmental Consultants had previously carried out an Invasive Species Survey report which confirmed that no invasive species were recorded at the subject site. This report was submitted under separate cover of Reg. Ref. LRD24A/0001 with an updated EclA submitted with the subject application.
12.3.3 Environmental Impact Assessment	An EIA Screening had been undertaken by AWN Consulting with full details submitted with the LRD application previously submitted on site which was considered acceptable under Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24.
12.3.4 Archaeological Heritage	<p>In line with the requirements of Section 12.3.4 of the Plan, AHC Ltd. had previously prepared an Archaeological Impact Assessment of the site, which notes that the proposed development area falls within the Zone of Archaeological Potential associated with Sally Park House (DU022-103----) as recorded on the Record of Monuments and Places. However, as the site is recorded as 'House - 18th/19th century' on the Sites and Monuments Record, the possibility of any physical elements of the RMP site extending into the proposed development area are negligible. Any impacts on Sally Park house are therefore deemed to be indirect, in the form of impacts on the visual amenity. The Council are invited to refer to this report submitted with the LRD application, Reg. Ref. LRD24A/0001.</p> <p>There are no known archaeological sites within the red line boundary of the development.</p>
12.3.9 Vernacular and Historic / Older Buildings, Estates, and Streetscapes	Mesh Conservation Architects had previously prepared a Heritage Impact Assessment for the subject site, analysing the existing buildings. The assessment concluded that there is nothing significant about the existing structures on-site, that would warrant protection from demolition. These buildings were since granted to be demolished under Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24, to allow for the subject development to occur, and site clearance work has begun since this grant of permission.

12.4 Green Infrastructure	
12.4.2 Green Infrastructure and Development Management	<p>Within the previous application on site, Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24, the required Green Space Factor worksheet was completed which confirmed that the proposal provided sufficient green infrastructure within the development. The applicant can confirm that a similar Green Space Factor worksheet shall be prepared to accompany Stage 3 of the application. It is noted that the subject development will have a significant Green Infrastructure net gain, given the current hardstanding brownfield site that currently exists. South Dublin County Council are invited to refer to the Landscape drawings submitted under separate cover for further details on the proposed landscaping and green infrastructure within the site.</p>
12.5 Quality Design and Healthy Placemaking	
12.5.1 Universal Design	<p>OMP Architects have prepared a detailed Architectural Design Statement in which an 'Access Statement' and 'Universal Design Statement' are included. The Design statement outlines how the proposed development is in compliance with the 12 Urban Design Criteria, including Context; Connections; Inclusivity; Variety; Efficiency; Distinctiveness; Layout; Public Realm; Adaptability; Privacy/Amenity; Parking and Detailed Design, of which Planning Authorities are recommended to assess planning applications.</p> <p>Further details of how the proposed development is in accordance with the Design Manual can be found in the Architectural Design Statement that has been prepared by OMP Architects and which is submitted under separate cover as part of this planning application.</p>
12.5.2 Design Considerations and Statement	<p>In line with the requirements of the Development Plan, OMP Architects have prepared an Architectural Design Statement, which details how the 'plan approach' has been taken into consideration and incorporated into the design of the proposed development.</p>
15.2.3 Density and Building Height.	<p>The proposed development provides for an overall density of 180 units per hectare. This is in accordance with National Policy and Section 28 Guidelines and is deemed appropriate given the need to encourage medium to high density residential development on</p>

	<p>served lands, in close proximity to good quality public transport which also have the benefit of being adjacent to high quality pedestrian and cyclist infrastructure and connections between active and passive recreational areas.</p> <p>Due regard has also been given to the proposed height of 2- 4-storeys, which has been acceptable within the previous application site, with a condition to reduce the overall height to 4-storeys as per ABP Ref. 319568-24.</p> <p>Please refer to the Urban Design Statement and Housing Quality Assessment prepared by OMP Architects for further details in this regard.</p>
12.5.5 Healthy Placemaking and Public Realm (At the Neighbourhood Level)	<p>The Plan sets out the following key principles for Healthy Placemaking and Public Realm:</p> <ul style="list-style-type: none"> • Identity and Sense of Place • Moving Around • Safe, Inviting, and Inclusive • Gateway Features and Signage. <p>It is proposed that the public realm within the development will enable the community to enjoy a healthy living environment within the site, while also enhancing the adjoining, existing public realm within the area. South Dublin County Council are invited to refer to the landscaping and architectural drawings submitted under separate cover, for further details on the proposed public realm as part of the application.</p>
12.5.7 Signage	<p>With the proposed development providing a number of retail and commercial units, the proposal includes a number of signage 'zones' signs on buildings at ground floor level which are proportionate to the scale of the building and will only advertise goods or services that are associated with the proposal. The advertising signage will be simple in design and integrate with the architectural language of the building. Details of the proposed signage are being proposed through Condition 6 of ABP Ref. 319568-24.</p>
12.6 Housing	
12.6.1 Mix of Dwelling Types	<p>The proposed development provides for a total of 83 no. apartment units and offers a variety of unit mix in terms of size and type, within studio, 1-, and 2-bedroom units.</p>

	<p>Whilst there are different apartment unit types provided in terms of bedroom provision, it is also important to note that within these categories of units, there is a significant amount of diversity in terms of size, layout, storage, aspect, room dimensions, etc. This ensures that the proposed development provides for the various needs of potential future residents and that it is a sustainable form of residential development which can cater for all age demographics and is adaptable and flexible for their future needs, be it, single professionals, young couples, small young families, older families, the elderly, those looking to downsize, etc.</p> <p>South Dublin County Council are invited to refer to the Housing Quality Assessment and Urban Design Statement prepared by OMP Architects for further details.</p>																														
<p>12.6.7 Residential Standards</p>	<p><u>Apartments</u></p> <p>All apartments will accord with or exceed the communal open space and floor area standards set out in Table 12.21 of the Plan (Figure 10 below). The design of schemes fully accords with the minimum standards outlined in the Apartment Guidelines in relation to design, internal facilities, aspect, lift/stair cores, communal facilities, refuse storage, bicycle parking and children’s play and amenity spaces. Please refer to the enclosed Housing Quality Assessment, prepared by OMP Architects, for further details.</p> <p>Table 12.21: Minimum Standards for Apartments</p> <table><tr><th>Type of Unit</th><th>Apartment</th><th>Private Open Space</th><th>Communal Open Space</th><th>Storage</th></tr><tr><td>Studio</td><td>37 sq m</td><td>4 sq m</td><td>4 sq m</td><td>3 sq m</td></tr><tr><td>One bedroom</td><td>45 sq m</td><td>5 sq m</td><td>5 sq m</td><td>3 sq m</td></tr><tr><td>Two bedrooms (3 person)</td><td>63 sq m</td><td>6 sq m</td><td>6 sq m</td><td>5 sq m</td></tr><tr><td>Two bedrooms (4 person)</td><td>73 sq m</td><td>7 sq m</td><td>7 sq m</td><td>6 sq m</td></tr><tr><td>Three bedrooms (5 person)</td><td>90 sq m</td><td>9 sq m</td><td>9 sq m</td><td>9 sq m</td></tr></table> <p><i>Figure 11. Minimum Standards for Apartments Extracted from Table 12.21 of the Development Plan</i></p> <p><u>Private Space</u></p>	Type of Unit	Apartment	Private Open Space	Communal Open Space	Storage	Studio	37 sq m	4 sq m	4 sq m	3 sq m	One bedroom	45 sq m	5 sq m	5 sq m	3 sq m	Two bedrooms (3 person)	63 sq m	6 sq m	6 sq m	5 sq m	Two bedrooms (4 person)	73 sq m	7 sq m	7 sq m	6 sq m	Three bedrooms (5 person)	90 sq m	9 sq m	9 sq m	9 sq m
Type of Unit	Apartment	Private Open Space	Communal Open Space	Storage																											
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One bedroom	45 sq m	5 sq m	5 sq m	3 sq m																											
Two bedrooms (3 person)	63 sq m	6 sq m	6 sq m	5 sq m																											
Two bedrooms (4 person)	73 sq m	7 sq m	7 sq m	6 sq m																											
Three bedrooms (5 person)	90 sq m	9 sq m	9 sq m	9 sq m																											

	<p>It is confirmed that the proposed development provides the following:</p> <ul style="list-style-type: none"> • The quantum of private open space the apartments accord with Table 3.21 of the Plan. • The spaces are provided in the form of terraces and balconies and are located to optimise solar orientation and designed to minimise overshadowing and overlooking. • No balconies overhang onto the public path. • Balconies are accessed via the main living areas of each apartment. • All balconies are a minimum depth of 1.5 metres, in one useable length. • Amenity spaces proposed at ground level incorporate boundary treatments to ensure privacy. • There is a clear distinction between the communal central open space and private open spaces through the inclusion of appropriate boundary treatments. <p><u>Communal / Semi-Private Space</u></p> <p>It is confirmed that the proposed development provides the following:</p> <ul style="list-style-type: none"> • Each of the apartment blocks has direct access to a dedicated communal open space area at ground, podium and roof levels. • All communal open spaces are screened from full public view and public access and restricted through innovative design mechanisms. • Communal amenity is provided centrally between the two blocks and at roof levels. The communal open space is visible from, and accessible to, all units proposed within the scheme. <p><u>Internal Storage Standards</u></p> <p>All units within the proposed development provides additional storage spaces to the kitchen presses and bedroom furniture.</p> <p><u>Lift and Stair Cores</u></p>
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	<p>The proposed development provides a maximum of 12 no. apartments per floor per staircase as required under SPPR 6 of the Apartment Guidelines.</p> <p><u>Separation Distances and Block Layout</u></p> <p>The Plan outlines that all proposals for apartment development and those over three storeys high should include a minimum clearance distance of circa 22 metres, in general, between opposing windows (which has since been updated to a distance of 16-metres, as per the Compact Settlement Guidelines). The Urban Design Statement prepared by OMP Architects outlines both the internal and external separation distances provided within the development.</p> <p><u>Privacy and Security Considerations</u></p> <p>It is confirmed that the proposed development provides the following:</p> <ul style="list-style-type: none"> • The apartment blocks overlook the communal open spaces and public realm. • All entrance points are clearly indicated, well lit, and overlooked by adjoining and adjacent units. • All ground floor units are secured. Internal and external communal area can only be accessed by the residents. • All residential units with direct frontage to the street and ground floor apartment include a privacy strip of at least 1.5 metres in depth. • The proposed landscape design and boundary treatments have been carefully considered to ensure all units are offered privacy and security. <p><u>Dual Aspect / Daylight Sunlight</u></p> <p>The proposed development provides 43% of the units as dual aspect which complies with minimum standards required for the subject location in a suburban setting. It is noted that of the single aspect units, no units are north facing ensuring sufficient daylight to the internal area of all apartments. A Daylight Sunlight Analysis has been prepared by Digital Dimensions, confirming that all proposed units satisfy the BRE standards.</p>
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<p>12.6.8 Residential Consolidation</p>	<p><u>Infill Sites and Corner Sites</u></p> <p>The proposed development has had full regard to the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities DEHLG, 2009 and the companion Urban Design Manual. A full site analysis has been undertaken by OMP Architects which takes account of the local context, the surrounding built form, density, features, materials, and finishes.</p> <p>A transition in height is provided along the eastern site boundary in direct response to the adjacent two storey semi-detached housing within Mount Carmel Park housing estate. The design of the proposal has also been cognisant of the prevailing built height within the area, the Protected Views from the N81 to the north and nearby protected structures.</p> <p>Further details in this regard are provided within the Architectural Design Statement prepared by OMP Architects.</p>										
<p>12.6.10 Public Open Space</p>	<p>Table 12.22 of the Plan (figure 11 below) sets out the requirements for public open space in the County.</p> <p>Table 12.22: Minimum Public Open Space Standards</p> <table border="1"> <thead> <tr> <th>Land Use</th><th>Public Open Space Standards (Minimum)</th></tr> </thead> <tbody> <tr> <td>Overall Standard</td><td>2.4 Ha per 1,000 Population</td></tr> <tr> <td>New Residential Development on Lands Zone RES-N</td><td>Minimum 15% of site area</td></tr> <tr> <td>New Residential Development on Lands in Other Zones including mixed use</td><td>Minimum 10% of site area</td></tr> <tr> <td>Institutional Lands / 'Windfall' Sites</td><td>Minimum 20% of site area</td></tr> </tbody> </table> <p><i>Figure 12. Minimum Public Open Space Standards Extracted from Table 12.22 of the Development Plan</i></p> <p>As per the permitted development under Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24, the proposed development provides 29% of the subject site as public open space. It is also noted that the site is located adjacent to the Regional Park of Dodder Riverbank Park.</p> <p><u>Children's Play Areas</u></p> <p>It is confirmed that the proposed development provides the following:</p> <ul style="list-style-type: none"> Children's play areas are provided in the semi-private (communal) and the public open space. 	Land Use	Public Open Space Standards (Minimum)	Overall Standard	2.4 Ha per 1,000 Population	New Residential Development on Lands Zone RES-N	Minimum 15% of site area	New Residential Development on Lands in Other Zones including mixed use	Minimum 10% of site area	Institutional Lands / 'Windfall' Sites	Minimum 20% of site area
Land Use	Public Open Space Standards (Minimum)										
Overall Standard	2.4 Ha per 1,000 Population										
New Residential Development on Lands Zone RES-N	Minimum 15% of site area										
New Residential Development on Lands in Other Zones including mixed use	Minimum 10% of site area										
Institutional Lands / 'Windfall' Sites	Minimum 20% of site area										

	<ul style="list-style-type: none"> • The proposed play spaces are generally based on the principles of natural play. • All play spaces are easily accessible and overlooked by the apartment units and non-residential units, while not causing a nuisance to nearby residents. • Suitable provision for teenagers has also been considered as part of the proposal. <p>The enclosed landscaping plans, prepared by Jane McCorkell Landscape Consultants, provided further details on the proposed open space and all associated play spaces proposed within the development.</p>
12.7 Sustainable Movement	
12.7.1 Bicycle Parking / Storage	<p>The proposed application allows for a total of 196 no. bicycle parking spaces within the scheme. All spaces are secure, covered and easily accessible to encourage residents and visitors to cycle to and from the development. For further information on consistency with these standards, please refer to the traffic scoping report submitted under separate cover.</p> <p>Table 12.23 of the Plan sets out the requirements for bicycle parking within the County with the following requirements:</p> <ul style="list-style-type: none"> • 1 no. long-term parking space per bedroom and 1 no. short-term parking space per two apartments. • 1 no. long-term parking space per 5 no. creche staff and 1 no. short-term parking space per 10 no. children. • 1 no. long-term parking space per 5 no. café staff and 1 no. short-term parking space per 10 no. seats. • 1 no. long-term parking space per 5 no. medical staff and 0.5 no. short-term space per medical consulting room. • 1 no. long-term parking space per 200 sq. m. office floor area and 1 no. short-term parking space per 200 sq. m. office floor area. <p>No specification is given for barber or betting offices.</p>

	<p>The Council are invited to refer to the supporting documents and drawings for further details on the bicycle parking provision, which confirms a total of 196 no. bicycle parking being considered acceptable.</p>
<p>12.7.2 Traffic and Transport Assessments and</p> <p>12.7.3 Travel Plans</p>	<p>Transport Insights had previously prepared a comprehensive TTA, including a Travel Plan, which was accepted under Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24. With the subject application seeking a reduction in the overall units, and thus a reduction in the traffic volumes associated with this development, it can be considered that the proposal remains acceptable from a traffic perspective.</p> <p>Transport Insights have prepared an updated Traffic and Transport Assessment to accompany the subject application, which has been submitted under separate cover of this application.</p>
<p>12.7.4 Car Parking Standards</p>	<p>The proposed development is located within a Zone 1 area and therefore the following car parking standards apply, as per Table 12.25 and 12.26 of the Plan:</p> <ul style="list-style-type: none"> • 1 no. parking space per 1-bedroom apartment; • 1.25 no parking space per 2-bedroom apartment; • 1.5 no. car parking space per 3-bedroom apartment. • 1 no. parking space per creche classroom. • 1 no. parking space per 15 sq. m. of café floor area. • 2 no. parking space per medical consulting rooms • 1 no. parking space per 50 sq. m. office floor area. <p>No specification is given for barber or betting offices.</p> <p>A car parking ratio of 0.63 spaces was previously acceptable within Reg, Ref, LRD24A/0001, and as such, the subject ratio of 0.63 car parking spaces per unit is also considered to be acceptable. This will provide for a total of 50 no. car parking spaces to cater for the residential units, the creche, and the commercial units.</p>

12.8 Community Infrastructure and Open Space	
12.8.4 Early Childhood Care and Educational Facilities	The proposed childcare facilities shall be provided in accordance with the Childcare Facilities: Guidelines for Planning Authorities (DEHLG). The proposed development will provide for a purpose-built childcare facility the site with appropriate outdoor play space, drop off facilities, etc.
12.9 Economic Development and Employment	
12.9.5 Retail Development	The proposed development seeks to provide 1 no. barbershop, 1 no. betting office, 1 no. café, 1 no. medical unit, and 1 no. office space, all of which will be designed in accordance with the appropriate guidelines.
12.11 Infrastructure and Environmental Services	
12.11.1 Water Management	<p><u>Flood Risk Assessment</u></p> <p>While the application site is not located in a flood prone area, this site was previously subject to a Flood Risk Assessment within the previous application Reg. Ref. LRD24A/0001 / ABP Ref. 319568-24, which was deemed acceptable.</p> <p><u>Surface Water</u></p> <p>The enclosed Infrastructure Services Report, prepared by BM Consulting Engineers, provides an overview of the surface water drainage associated with the proposed development.</p> <p><u>Sustainable Urban Drainage System (SuDS)</u></p> <p>The enclosed Infrastructure Services Report, prepared by BM Consulting Engineers, provides an overview of the SuDS proposals associated with the proposed development. Proposed SuDS measures incorporated into the development include:</p> <ul style="list-style-type: none"> • Green/Blue roofs to all flat roof areas. • Blue roof system to the Basement Podium at ground floor level. • Infiltration Trenches within the public realm areas to the south and east of the building. • Tree pits and raingarden areas to the public realm areas.

	<ul style="list-style-type: none"> • Permeable surface paving and subsurface attenuation layer.
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In this regard, the proposed development will provide for a high-quality residential development on appropriately zoned lands within the area of Firhouse. The development will represent a sustainable form of residential development, along with appropriate sufficient ancillary uses such as café, retail, and medical units to cater for both the existing and future residents of the immediate area. It is respectfully submitted that the proposed development adheres with the key development plan objectives and requirements of the South Dublin County Council Development Plan 2022-2028.

4.0 Conclusion

This Statement of Consistency demonstrates that the proposed development is in compliance with relevant national, regional, and local planning policy. It is submitted that the proposed development will provide an appropriate form of development on the subject lands that are zoned '*LC – Local Centre*', a zoning designation which permits in principle residential use and other complementary land uses such as the ones proposed; barbershop, betting office, café, medical unit, office space, and creche. The proposed development will provide for an effective, efficient, sustainable use of a currently vacant brownfield site within Firhouse which is a highly accessible location very well served by public transport.

The nature, form, and extent of the proposed development has been informed and guided by previous planning applications on site, including the decision by An Bord Pleanála to grant permission for 78 no. units and commercial units on site. The subject application is now seeking amendments to this application to include a reduction in the basement levels, reconfiguration of the floor plans, amendments to the housing mix and elevations of Block A and Block B, amended roof profile, and relocation of substation, as well as amendments to the commercial units with a total of 83 no. residential units proposed. These proposed amendments have arisen from an operational requirement from the potential end-users of the commercial units, along with the construction viability of the residential units.

In light of the above, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area in which it is located as expressed in national, regional and local planning policy and Guidelines issued under Section 28 of the Planning and Development, 2000 (as amended), and as such, it is considered that the proposed development at No. 2 Firhouse Road and the former Morton's The Firhouse Inn, Firhouse Road, Dublin 24, represents a high-quality Large-Scale Residential Development proposal which is now being submitted for Pre-Planning Consultation with South Dublin County Council.