



An
Bord
Pleanála

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

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

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

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

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

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

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

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

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

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

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

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

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

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

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

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

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, as amended, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2020 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Stephen O'Sullivan
Assistant Director of Planning
February, 2022