

Councillor Alan Edge

County Hall

Tallaght

Dublin 24

Strategic Housing Division  
An Bord Pleanála  
64 Marlborough Street  
Dublin 1

12th July 2022

Re. SHD Application (ABP Ref. 310640-21), Firhouse Road

To whom it concerns,

I wish to object in the strongest terms to the above proposed Strategic Housing Development. As a councillor representing the Area as well as the outgoing Chair of the Local Area Committee, I wish to begin by restating my total opposition to the SHD system which is acknowledged near universally to be an abject and utter failure and to express my lack of confidence in An Bord Pleanála as the national planning authority. Bad planning is not a solution to the present housing crisis yet it has been the inevitable consequence of the SHD scheme, which has now thankfully been consigned to the scrap-heap of poor governmental housing policies, but sadly not before leaving its mark on my Local Electoral Area in particular.

My objections fall under various heads but my overarching submission is that, on any sensible view, this site is simply not big enough to accommodate 100 units. The inescapable conclusion residents to be drawn is that the attempt to cram 100 units into this space, which will lead to a massive and irreversible loss of amenity for local as well as wholly unmanageable additional strains on local infrastructure, is being made purely and solely to derive the benefits in terms of lack of effective regulation from the fast-track process in its dying days, notwithstanding that this site is plainly unsuited for a development of this height and density. That much should be obvious to any reasonable planning authority and is as clear as day to the residents of nearby Mount Carmel Park and to those of us elected to represent them.

By way of background, Mount Carmel Park is a small, quiet, mature residential street of approximately 30 terraced homes arranged in a rectangle and accessed by way of a very narrow road. It is situated next to Dodder Valley Park and therefore adjacent to the new Dodder Greenway.

My objections to this particular development are as follows:

**(i) Density inappropriate relative to location**

That a density in excess of 200 units per hectare is wildly inappropriate for this area hardly needs stating, notwithstanding the shift away from maximum densities in favour of floor ratios and design considerations by successive governments in recent times. Such a shift in focus cannot nullify, it is respectfully submitted, a reasonable assertion that the number of units proposed here is vastly too big for a plot this size, having regard also to the relative lack of public transport (no train or Luas is within easy reach, the roads are at or near capacity in terms of private cars at peak times and the area is served only by oversubscribed bus routes). That the site is inappropriate for a development of this size is glaringly obvious from the developer's own drawings, see for instance, 2022-OMP-00SPDRA1000.

**(ii) Height relative to neighbouring properties**

While the gradual erosion of the checks and balances enshrined in County Development Plans and Local Area Plans means that the previous requirement under CDP 2016-22 that 'new residential development that adjoins existing one and/or two storey housing (backs or sides onto or faces) shall be no more than two storeys in height, unless a separation distance of 35 metres or greater is achieved' no longer applies, it is submitted that the principle upon which that requirement was based should still apply in any reasonable planning system, namely that while building higher may well be appropriate in many cases, the decision to do so must take into account the relative heights and character of the neighbouring properties and the distance between them. In this instance, a distance of 22m from 1a Mount Carmel Park to the nearest apartment block is entirely insufficient. Further, while the 2020 guidelines on apartment design don't acknowledge the impacts on existing homes of new apartment blocks, they do recognise in another context the importance of light as an amenity for apartment dwellers. The same must apply, on any sensible view, to existing residents whose light will be impacted dramatically by the building of blocks so tall relative to their homes and at such a short distance.

**(iii) Proximity to HA zoned Dodder Valley Park**

I am far from persuaded by the conclusion of the EIAR that there is unlikely to be a significant risk to wildlife posed by the instant development particularly having regard to its size and height relative to its surrounds. Of particular concern is that under the assessment of likelihood of impact under CIEEM guidelines, 'Unlikely' is defined as a probability between 5% and 50%. Given the critical ecological importance of Dodder Valley Park, the board should on any view exercise great caution in allowing a development of this density so close to this area of High Amenity. I pray in aid the baseline survey carried out of Dodder Valley Park in respect of the proposed Integrated Wetlands construction which can be found at <https://sdcc.ie/en/services/environment/dublin-urban-rivers-life/integrated-constructed-wetlands/dodder-valley-park-icw/dodder-valley-park-ecological-survey-report.pdf> and which lists the following species as present within the study area:

Common Frog; Smooth Newt; Barn Owl; Swallow; Black-headed Gull; Brent Goose; Common Coot; Goldeneye; Grasshopper Warbler; Greenshank; Kestrel; Kingfisher; Linnet; Pochard; Redshank; Sandpiper; Snipe; Starling; Swift; Wood Pigeon; Corncrake; Curlew; Oystercatcher; Teal; Tree Sparrow; Wigeon; Golden Plover; Great Black-backed Gull; Cormorant; Great Crested Grebe; Grey Partridge; Greylag Goose; Hen Harrier Herring Gull; House Martin; House Sparrow; Sand Martin; Skylark; Spotted Flycatcher; Stock Pigeon; Tufted Duck; Water Rail; Whinchat; Whooper Swan; Wood Warbler; Yellowhammer; Daubenton's Bat; Otter; Badger; Pine Marten and Hedgehog.

**(iv) Sewage**

Notwithstanding preliminary works to enlarge the scheme, Dodder Valley Sewer into which this development will connect is operating above capacity as evidenced by the regular surcharging of raw sewage into Dodder Valley Park. This situation will only be exacerbated by the granting of permission for a development of this density at this site.

**(v) Character and Amenity**

H13 Objective 5 of the South Dublin County Development Plan 2022-2028 is 'to ensure that new development in established areas does not unduly impact on the amenities or character of the area'. The proposed development is entirely out of character with the receiving environment in every way and would if granted inevitably impact on the amenity of

local residents in an intolerable way, in terms inter alia of light, infrastructure, parking, public transport, water services and aspect.

For the reasons set out, it is my submission that the above application should be refused on the basis that development on this site should be less dense and more in keeping with the receiving environment particularly as regards height.

Kind regards

Cllr Alan Edge