



20a Mountcarmel Park  
Firhouse  
Dublin 24

26<sup>th</sup> June 2022

An Bord Pleanála  
64 Marlborough Street  
Dublin 1  
Co. Dublin

**RE: Appeal to An Bord Pleanála against granting Planning by Bluemont Developments (Firhouse) Limited to An Bord Pleanála (the Board) for a Strategic Housing Development with a total site area of c.0.46 ha, on lands located at No. 2 Firhouse Road and the former 'Morton's The Firhouse Inn', Firhouse Road, Dublin 24.**

---

To whom it may concern,

We refer to the above application for a Residential development:

***The development with a total gross floor area of c. 11,638 sq m, will consist of 100 no. residential units arranged in 2 blocks (Blocks 01 and 02) ranging between 3 and 5 storeys in height, over lower ground floor and basement levels, comprising:***

- ***96 no. apartments (consisting of 2 no. studio units; 45 no. one bedroom units; 10 no. two bedroom (3 person) units; 34 no. two bedroom (4 person) units; and 5 no. three bedroom units), together with private (balconies and private terraces) and communal amenity open space provision at podium and roof levels;***
- ***4 no. duplex apartments (consisting of 2 no. one bedroom units and 2 no. two bedroom units (4 person) located within Block 01, together with private balconies and terraces.***

***The development will also consist of non-residential uses (c. 355 sq m), including:***

- ***1 no. café (c. 58 sq m) and 1 no. office (c. 30 sq m) located at ground floor level of Block 01;***
- ***1 no. medical unit (c. 59 sq m) and 1 no. betting office (c. 66 sq m) located at ground floor level of Block 02;***
- ***1 no barber shop (c. 28 sq m) located at ground floor level between Blocks 01 and 02; and***
- ***1 no. crèche (c. 114 sq m) located at lower ground floor level of Block 01 and associated***

*outdoor play area to the rear.*

***The development will also consist of the provision of public open space and related play areas; hard and soft landscaping including internal roads, cycle and pedestrian routes, pathways and boundary***

***treatments, street furniture, basement car parking (80 no. spaces in total, including accessible spaces); motorcycle parking; electric vehicle charging points; bicycle parking (long and short stay spaces including stands); ESB substations, piped infrastructural services and connections to existing public services, (including relocation of existing surface water sewer and water main from within the application site onto the public roads area along Firhouse Road and Mount Carmel Park); ducting; plant; waste management provision; SuDS measures; storm water management and attenuation; sustainability measures; signage; changes in levels; public lighting; and all ancillary site development and excavation works above and below ground.***

We cannot stress highly enough the importance of consideration of sensitivities in the area of Mountcarmel Park and the surrounding areas in relation to residential development, the local history, wildlife, park recreation and the effects of all and any development on the current residents homes and lifestyles. Being cognisant of all of the enclosed information **we would urge An Bord Pleanala to refuse permission for this development.**

Issues arising from the development that will directly affect the residents of Mountcarmel Park are numerous as outlined below but a number of our neighbours will suffer the additional stress of having their homes and gardens overlooked as they face the development itself. The suggested height of the development will severely detract from the natural daylight on these properties not to mention their homes will be directly “looked into” at ground floor, second floor and attic level.

With the addition of this development come a number of balcony areas which again will overlook a number of resident’s homes and gardens directly. With outdoor areas such as this there will undoubtedly be an increase in noise volumes in an area which was once quiet.

The lighting of the development will also mean an increase to artificial light in the area, again affecting those facing the development more so the all residents.

This will without a doubt have an effect on the health of those residents whose properties are directly affected. More artificial light, increased noise pollution and the removal of privacy from their homes!

The case that some residents will suffer the ill effects of this development more so than others only bolsters the fact that we stand together as residents of the area as a whole against this development.

### **Car Parking**

The application proposes Vehicular access to the site will be off the Firhouse Road. The proposal includes alterations to the existing access, including the provision of new and enhanced parking infrastructure as stated here:

***“basement car parking (80 no. spaces in total, including accessible spaces); motorcycle parking; electric vehicle charging points; bicycle parking (long and short stay spaces including stands)”***

If the developer is proposing 96 apartments, 4 duplex apartments and additional retail units, how can basement parking for 80 vehicles in total be an adequate provision?

There are only 80 car parking spaces provided for the potential residents of the proposed development of 100 apartments, only 46 of which are "1 bed roomed". Even a very conservative estimate giving the occupants of **half** the dwellings two cars per household and giving a very conservative estimate again for the other half of the dwellings at one to zero car per household, the

figures still break down as follows:

2 cars X 50 homes = 100 cars

1 car X 30 homes = 30 cars

0 car X 20 homes = 0 cars

Total 130 cars

Therefore, even with these **very conservative** estimates on car ownership, there would not even be enough car parking spaces for the people who live there. Are we to assume they will never have *any* visitors? That they will never have *any* deliveries? Or are the developers looking to Mount Carmel Park, the Firhouse Road, and the surrounding estates of Sally Park, Monalea etc. to become the overspill car park for Developments new ill-placed estate.

All of the above and this only relates to residential dwellings. **Where will the parking for the retail units be housed?**

The residents of Mountcarmel Park have suffered very badly in recent years due to ill-advised parking in the area. We have been blocked into our front gardens, been unable to access side gates and have been unable to drive through the area due to the road/paths being blocked by those visiting the area, parking for onward transmission to public transport and those utilizing the Dodder Greenway.

This has also caused an issue for residents in the area using prams/strollers and those in wheelchairs or using walking aids.

We would ask the Bord be especially cognisant of the use of the road for emergency vehicle access as this too has been an issue in the past and we feel the addition of the vehicles that will come with this development will cause this issue to become more persistent going forward.

### **Traffic**

This area currently deals with high traffic volumes especially during school hours. The volume of cars parked along the main Firhouse road and spill over to Mountcarmel Park and other surrounding estates is above capacity on a minimum of 3 occasions per day and is already a danger to public safety by reason of traffic hazard and obstruction of road users. We are extremely anxious that the location of the suggested development would endanger those attending Scoil Carmel, the residents and users of the area due to its proximity to same.

There are 3 different times a day, five days a week that the surrounding roads and pathways of Scoil Carmel, the Primary School, become chaotic with traffic and parking. The Gardaí have often had to make spot checks as the situation has become so dangerous. There is practically no parking available for the school, and unfortunately a very large amount of pupils are brought and collected by car each day.

All the children are due in for the start of school at 9.15 am each day. Junior and senior infants are finished at 2 pm, while first and second class are finished at 3 pm each day, thus accounting for the 3 peak times mentioned above.

Regardless of the school principal's continual pleading via the newsletter asking parents not to

park on the paths or block the road, it still happens 3 times a day, 5 days a week. As even the oldest of the children are still only very young and small in height it is difficult to see them from behind all the parked cars. It really is already a very bad situation that is dangerous enough, but that will be made all the worse by the granting of permission for this proposed development as it will add so much more traffic from the building stage continuing to residential stage.

The period of time of construction would also see a significant rise in the volume of traffic and would see the addition of heavy duty construction vehicles. We are a small estate which has already suffered over 12 months of heavy construction influx and the noise and dirt associated with same due to the construction of the Dodder Greenway. Enough really is enough, this estate is at saturation point!

#### **Existing Sewage Pollution Problems:**

Since the completion of the Dodder Greenway it has yet to be seen if past problems will rear their head. A deeply worrying and dangerous health hazard in previous years was/is the manhole opposite the Firhouse Weir twenty feet or so approximately from the red pedestrian footbridge that spans the Dodder there. Going back many years it has a history of overflowing and spewing forth *raw sewage directly into the Dodder and along the banks and footpaths*. The health hazard implications for the public are enormous as the detritus includes; faeces, urine, toilet paper, used tampons, and used condoms, among other things. These are all left behind on the paths and bridge where children and toddlers walk and play with their parents, and dogs too.

It would appear the developer intends to feed into this very same sewerage system **all sewage and all run-off rainwater from the proposed sites 96 apartments, 4 duplex apartments and additional retail units as noted here:**

**“piped infrastructural services and connections to existing public services, (including relocation of existing surface water sewer and water main from within the application site onto the public roads area along Firhouse Road and Mount Carmel Park)”**

This can only have catastrophic consequences for the immediate area, the residents in the new proposed development and the current residents in Mountcarmel Park as we have yet to see if the building of the Greenway has solved this historical issue and only increased rainfall and time will tell.

We can however say that all and any additional sewage being fed into the current systems will only make the possibility of a sewage leak more likely.



Photo taken 24/2/2016, **eleven & a half weeks after a sewage overflow**, and the toilet paper etc is still clearly visible

### **Passive Supervision**

We believe this development would increase anti- social behavior in an area which currently has numerous exits for those attempting to evade the authorities. More so now with the removal of kissing gates along the Dodder Greenway.

The addition of such a development would increase the number of routes available to those committing anti-social behavior and would undoubtedly make the job of the authorities apprehending same more difficult in the long run.

Located diagonally on the junction to the proposed build is a development of social housing which ceased works with 30% completion and which now stands idol. This in itself is a feeding ground for anti-social behavior. How can yet another development be granted permission when there are developments standing idol and nowhere near future completion in the immediate area already?

### **In Closing**

The application for this development has caused a high level of concern and stress for the residents of this area. Residents, both young and old have been reduced to tears when considering the negative impact such a development would have were it to go ahead.

We sincerely hope the above information will be strongly considered as part of your decision making process and look forward to your decision in due time.

Yours Faithfully,

Helene Carter & Gerry Morris  
20a Mountcarmel Park, Firhouse, D24AF82