



An
Bord
Pleanála

Inspector's Report ABP 304060-19

Development

Removal of non-original structures
Rear extensions, side extension fuel shed, garage garden sheds.
Construction of single storey (over basement) extension with a stated floor area of 167 square metres at the side and rear at garden level inclusive of part basement with a stated floor area of 108 square metres.

Replacement of non-original dormer extension with new dormer extension

Modifications internal walls and door openings, window opes and replacement 'slimlite' glazing

construction of small en-suite bathroom extension at side.

Cleaning and brick repairs, upgrades to window, facades, roof fabric including valleys and rainwater goods.

Landscape working to front and rear gardens and to random coursed granite boundary wall with No 79.

Location

81 Park Ave. Sandymount, Dublin 4.

Planning Authority

Dublin City Council

P.A. Reg. Ref.

4061/18

Applicant

Laura Bradshaw

Type of Application

Permission.

Decision

Grant Permission

Type of Appeal	Third Party
Appellant	John Pugh
Date of Inspection	12 th , June 2019
Inspector	Jane Dennehy

Contents

1.0 Site Location and Description	4
2.0 Proposed Development	4
2.2. Decision	7
2.3. Planning Authority Reports	7
2.5. Third Party Observations	8
3.0 Planning History.....	8
4.0 Policy Context.....	8
4.1. Development Plan.....	8
5.0 The Appeal	10
5.1. Grounds of Appeal	10
5.2. Applicant Response	10
5.3. Planning Authority Response	12
6.0 Assessment.....	12
7.0 Recommendation.....	16
8.0 Reasons and Considerations.....	17

1.0 Site Location and Description

- 1.1. The site of No 81 Park Avenue which has a total stated area of 2,913 square metres is an Edwardian detached double fronted villa located on the west side of Park Avenue close to its junction with Sydney Park Avenue. The Dart and mainline rail line is located to the south side of the rear boundary. There is vehicular entrance with gates, piers and walls on the front boundary with shrubs and trees and a gravelled surface to the front of the dwelling. To the rear there is a deep rear garden which is subdivided at the southern end by a hedgerow. There are detached houses on large plots to north (No 79) and to the south at the corner with Sydney Park Avenue.
- 1.2. The original house, the stated area of which is 129 square metres has been subject to some earlier interventions which internal alterations, and removal of original rear buildings to facilitate the later addition of a rear conservatory, rear and side extensions and a dormer extension at roof level. Otherwise internal planform is relatively unaltered, and joinery and plasterwork features and fittings are intact and in good condition.

2.0 Proposed Development

- 2.1. The application lodged with the planning authority indicates proposals for internal and external alterations and refurbishments to provide for demolitions, upgrades and extensions resulting a development with a total stated floor area of 517 square metres comprising:
 - Removal of non-original structures rear extensions, side extensions fuel shed, garage and garden sheds.
 - Construction of single storey (over basement) extension with a stated floor area of 167 square metres at the side and rear at garden level inclusive of part basement with a stated floor area of 108 square metres.
 - Removal of and reconstruction of a dormer extension.
 - Modifications internal walls and door openings, construction of small en-suite bathroom extension at side, modifications to window opes at rear,

refurbishment of timber windows to include replacement 'slimlite' double glazing.

- Cleaning and localised brick repair and upgrades to window, facades, roof fabric including valleys and rainwater goods.
- Landscape working to front and rear gardens and to random coursed granite boundary wall with No 79.

The application is accompanied by a Drainage report incorporating a flood risk assessment, a comprehensive building conservation report.

2.2. Further to issue of a request for additional information in respect of concerns about the suitability of elements of the proposed development further information inclusive of a conservation assessment report, a structural report on the basement was lodged with the planning authority on 12th February, 2019. It is submitted that modifications, details of which are outlined below, proposed in the submission have addressed the initial concerns of the Conservation Officer, (who is in favour of contemporary design) about quality, cumulative impact, harm to and loss of fabric at the original dwelling.

2.2.1. Included are some proposed design revisions, which it is submitted reduce the extension to which original fabric would be lost to facilitate the proposed development.:

- a reduced size curtain walling system with a width of 1200 mm at the rear providing a guillotined window retaining some original rear fabric and alignment with sash windows at first floor level and a reduction in depth to the extension to 19755 mm from 20775 mm with removal of a conservatory.

In the submission it is stated that an alternative option in which the length of the extension is reduced, and the width increased was also considered but it was deemed incompatible and over scaled. Reference is made to a permitted extension at No 68 Park Avenue. (P. A. Reg. Ref. 3347/17 refers.)

2.2.2. With regard to the proposed basement it is submitted that sufficient prevention of potential structural damage is provided for according to the structural engineering report. Provision is provision is made for:

- a buffer between the inner face and gable of the dwelling and boundary wall.

- Secant piles 4.5 m from the gable of No 79 to the north, 1.1 metres from the gable of No 81 to the east. The piles could be constructed as cantilevers. To the west is open garden and the rail line is 15 metres to the south of the basement. Noise and vibration monitoring will be provided. The basement area at 109 square metres in footprint is 3.8 per cent of the site area, the threshold being 50%. And the footprint of the house, (as required under section 16.10.15 of the CDP) at 129.5 square metres is not exceeded. A lightwell designed into the landscaping will enhance the amenity space.

2.2.3. With regard to flooding risk and the location (in Site 8) within a “Defended Area” protected by flood defences that include sea walls, embankment and embankments according to section 4.8 of Vol 7 of the CDP which allows some scope for lower finished floor levels. The development would be covered by the requirements in section 4.6 providing for at least a 1 in 100 (year fluvial) or 1 in 200 year (tidal) standards with a freeboard included in the defence height and it allows for small scale extensions in Site 8.

- The site is defended by a flood wall and gate which protects the railway line and other dwellings in addition to the application site and these measures protect against 1 in 200 year events.
- The drainage design, includes sufficient water drainage infrastructure surface water pumping chambers, allows for installation of the waterproof membrane and reinforcement works and is to the standards in Eurocode 2 Part 3 Water Retaining Structures. SUDS drainage measures providing for a sump and SUDS provisions for surface material and green roofs for the extension are also included and there will be no impact on the water table.
- There is precedent for basement development in the area at No 70 Park Avenue. A condition is attached regarding arrangements for basement drainage. (P. A. Reg Ref. 43341/07 refers.) Reference is also made to permitted basement development slightly larger than the size of the proposed development at 19 Temple Road, Dartry, (Reg. Ref. 3142/17 refers.)
- In providing for modifications to the proposed dormer, the standards in Appendix 17.11 of the CDP have been observed providing for a revised design that is contemporary and subservient to the original house. The

existing dormers are not original. The revised dormer similar in size to existing windows and is setback from the eaves and reduces visual impact, for a dormer that reflects the character of the development in the area.

- A reduced size garage relative to the original proposal and comparable in size to the existing is proposed in the further information submission which the conservation officer accepts along with the WC and plant room.

2.2.4. Planning Authority Decision

2.3. Decision

By order dated, 8th March, 2019, the planning authority decided to grant permission. The conditions attached are of a standard nature inclusive of requirements for monitoring and management of the project by a Conservation Architect, recording for authentic reinstatement and best conservation practice. Condition No 3, and Implementation of works set out in the Method Statement prepared by the applicant's consultant engineers on 12th February, 2019.

2.4. Planning Authority Reports

2.4.1. Planning Officer

The planning officer indicated satisfaction with the proposed development it being stated in the final report on the further information submission that the modified proposals addressed the concerns raised in the additional information request.

2.4.2. Other Technical Reports

Conservation Officer.

- 2.4.3. In the conservation officer dated, 16th November, 2018, on the original application submission, there is a comprehensive commentary on the existing structure and on the proposed development. Serious concern is expressed about the proposed incorporation of a basement, the dormer window replacement, curtain walling system, the extensions, the replacement plant and garage structure, interventions to the floorplan and loss of historic fabric involved in the proposal.

- 2.4.4. Refusal of permission is recommended on grounds of (1) contravention of Policy Objective 11.1.5.3 of the CDP due to the scale of the dormer window and curtain

walling system, loss of historic fabric, extensive negative impact on architectural character and legibility of the structure and undesirable precedent and, (2) contravention of Policy Objective 16.10.15 of the CDP for discouragement of significant underground or basement development and excavation below ground at or adjacent to residential properties in conservation areas or properties included on the record of protected structures.

- 2.4.5. There is no supplementary report from the Conservation Officer on the further information submission on file.

2.5. **Third Party Observations**

- 2.5.1. A submission was received from the Appellant party on 17th October, 20198 who indicates that he objects to the proposed above ground development and the basement level in that they would amount to destruction of a fine Edwardian house.

3.0 **Planning History**

- 3.1. There is no planning history for the application site according to the planning officer report.

4.0 **Policy Context**

4.1. **Development Plan**

- 4.1.1. The operative development plan is the Dublin City Development Plan 2016-2022 (CDP) according to which the site is within primarily within an area subject to the zoning objective: Z2: “Residential Neighbourhoods (Conservation Areas)”.
- 4.1.2. No 81 Park Avenue is included on the Record of Protected Structures.
- 4.1.3. Policy Objective CHC2 is reproduced below:

“To ensure that the special interest of protected structures is protected. Development will conserve and enhance Protected Structures and their curtilage and will:

- a) Protect or, where appropriate, restore form, features and fabric which contribute to the special interest.*

b) Incorporate high standards of craftsmanship and relate sensitively to the scale, proportions, design, period and architectural detail of the original building, using traditional materials in most circumstances

c) Be highly sensitive to the historic fabric and special interest of the interior, including its plan form, hierarchy of spaces, structure and architectural detail, fixtures and fittings and materials.

d) Not cause harm to the curtilage of the structure; therefore, the design, form, scale, height, proportions, siting and materials of new development should relate to and complement the special character of the protected structure.

e) Protect architectural items of interest from damage or theft while buildings are empty.

f) Have regard to ecological considerations for example, protection of species such as bats.

Changes of use of protected structures, which will have no detrimental impact on the special interest and are compatible with their future long-term conservation, will be promoted.”

- 4.1.4. These policies and objectives are elaborated on in detail in section 11.1.5.3 in which the reinstatement or protection of the original planform, retention of historic use where possible, securing long term viable use and avoidance of harmful extensions and modifications is encouraged.
- 4.1.5. Policies, guidance and standards for alterations an extension to dwellings are set out in section 16.2.2.3 and Appendix 17. Guidance and standards for roof level extensions are provided for in Appendix 17.11.
- 4.1.6. According to section 16.10.15 it is the policy of the planning authority to discourage significant underground development and excavation work basements and, extensions to existing basement development, adjacent to residential properties in conservation areas and/or included on the record of protected structures. It is stated that significant basement development has been sought in planning applications in recent years and there is concern as to risk of flooding and excessive provision habitable accommodation over one hundred percent in site coverage. Such development in Flood Zone A or B areas is not permissible according to Policy SI13. For large sites the basement should not exceed the footprint the original building and

in all cases not more than fifty per cent of the garden space. There are requirements for regard to the water table, landscaping, SUDS drainage, sunlight and daylight penetration structural stability of the existing and adjoining properties and infrastructure and provision for a means of escape and ventilation.

5.0 The Appeal

5.1. Grounds of Appeal

5.1.1. An Appeal was received from John Pugh of Cherokee, Shrewsbury, on 27th March, 2019. Mr Pugh states that he strongly objects to the scale of the development and the extent of destruction of a very fine historic building. According to the submission:

- The property is a period building, has a strong political history and is a fine detached house of its era with gardens and it is fully enclosed by a wall. For it to abut the garden walls as proposed detracts from the period detached status.
- The replacement for the fine gate piers to the garden is a loss to the original and are unacceptable.
- The en-suite for Bedroom 01 is like a box planted on the side and it detracts from the original stain glass windows which catch the evening light sunlight.
- The period features are compromised by the reconfiguration of the ground and first floors.
- The roof design looks horrific and would destroy a beautiful property
- The proposed basement detracts from the period status

5.2. Applicant Response

5.2.1. A submission was received from Hughes Planning on behalf of the applicant on 24th April, 2019 It includes an outline of the planning background and context. The response to the appeal is outlined in brief below:

- The width of the proposed extension is 1125 mm wider than the existing side extension. It is single storey so a degree of separation is retained at first floor

level. It will not detract from the detached nature of the house and adjoining house at No 79 Park Avenue to the north. It has extensive gardens and a separation distance of three metres from No 79 Park Avenue. There is precedent for infill to the boundary walls at Nos 73, 75, 77 and 79 Park Avenue. There is an existing gated side passage used for utility storage purposes and which is unsightly.

- The existing non-original roof dormer is visible from the public road. The proposed contemporary dormer is below the ridge, not visible from the public road and is distinguishable from the existing and is compatible with the natural slate at roof level and the existing building. It is consistent with Section 16.2.2.3 of the CDP.
- The piers and gates leading to the rear garden are of limited architectural merit and the screening wall is not a characteristic feature in Park Avenue. Removal is required to facilitate vehicular access for the garage to be constructed at the rear on the southside. The contemporary design complements the period house. The proposed gate piers to be setback five metres from the front elevation are in brick with lower gates.
- The basement is under the extension and to the rear and connected to the garden by sunken terrace. will not compromise historic fabric or character. There is precedent for basement development in the area at No 70 Park Avenue. A condition is attached regarding arrangements for basement drainage. (P. A. Reg Ref. 43 41/07 refers.) Reference is also made to permitted basement development slightly larger than the size of the proposed development at 19 Temple Road, Dartry, (P. A. Reg. Ref. 3142/17 refers.)
- The interventions to internal walls and history fabric were considerably reduced in the proposals shown in the further information submission. The creation of void at first floor level allows for light penetration.
- The en-suite bathroom does not detract from the character of the house and is setback to from the brick reveals of the stain glass window which is north west facing with limited scope for daylight penetration. The long south window will provide additional lighting.

5.3. **Planning Authority Response**

5.3.1. There is no submission from the planning authority on file.

6.0 **Assessment**

6.1. The main elements of the proposed development considered separately below followed by Environmental Impact Assessment and Appropriate Assessment are:

Demolition/removal/interventions to historic fabric.

Repair and maintenance works.

Ground Level Extensions

Curtain walling system to rear facade.

Replacement dormer extension at roof level

Environmental Impact Assessment

Appropriate Assessment.

6.2. **Demolition/removal interventions to historic fabric**

6.2.1. It is of note that significant modifications were made to the original proposal for the development in the response to the request for additional information issued by the planning authority. As a result, the historic fabric to be removed to facilitate the current proposal is very much reduced relative to the that indicated in the original application. On balance the interventions to historic fabric indicated in the modified proposal are considered reasonable in the context of facilitating contemporary living standards and sustaining the viability of the building and its use as a single dwelling unit. However, it is agreed with the appellant party that the demolition of the existing gate piers and wall at the side of the house to the front of the house is unacceptable in that they are integral to the integrity of the setting and context of the house. The width of the existing opening between the gate piers, based on review of the site plans and inspection appears to be sufficient in width for vehicular access requirements associated with the residential use of the dwelling.

6.3. Repair and Maintenance works.

6.3.1. There is no objection to the proposed demolition and removal of the extensions, including the dormer extension, sheds and outbuildings on the site which are of no special merit or interest and which are stated to date from the 1990s and include the garage structure also of relatively recent construction, but which may incorporate salvaged decorative features on the upper façade

6.4. Subject to adherence to good conservation practice as proposed, the proposed repair and maintenance works to the existing structure are appropriate and acceptable.

6.5. Basement Extension.

6.5.1. At the outset it should be borne in mind that the current development plan includes, in section 16.10.15 newly introduced policies and standards which include discouragement of below ground/basement level development at and adjacent to historic properties included on the record of protected structures. These restrictions amount to a major departure from the more flexible prior development plan policies on excavation and basement development at protected structures and residential properties in conservation areas.

6.5.2. The proposed development of the basement is adjacent to the existing protected structure and within its curtilage, adjacent to boundaries and as such the policy to discourage basement development at and adjacent to historic properties included on the record of protected structures is applicable.

6.5.3. The assessment and approval of permitted basement development referred to in the appeal as precedent to support the proposed basement development preceded the adoption of the current development plan. Due to the changed policy parameters there is no scope for relevant precedent to be taken from the permitted basement level developments referred to in the Appeal.

6.5.4. The proposed basement would necessitate considerable excavation and is a significant below ground development. Notwithstanding the considerable site size and the case made in the application and appeal as to its suitability and as to the acceptability of the proposed basement design, favourable consideration which is not supported, would set precedent for further similar development.

- 6.5.5. Separately, the application site is located within an area indicated as Flood Zone A according to review of the justification test provided for “Site 8” in the Strategic Flood Risk Assessment Report (SFRA) incorporated in the Dublin City Development Plan 2016-2022, providing for development plan reviews and for development management. The SFRA’s justification test provides for scope for development consolidating the built-up urban settlement and some (above ground) extensions within Site 8 but this does not extend to include basement development within Flood Zone A or B at private houses intended for use for occupation as a single dwelling unit irrespective of whether the house is a historic property. This is consistent Policy SI13 of the CDP according to which basement and above ground buildings for residential use below the estimated flood levels for Zone A and B are not permitted.
- 6.5.6. The basement development would therefore be in material contravention of this policy objective and unacceptable.

6.6. Ground Level Extensions

- 6.6.1. The proposed above ground extensions and additions, which are contemporary in design, materials and finishes are extensive but considered that the site size and configuration has considerable capacity to accept additional development without undue adverse impact on the original house and its setting and context.
- 6.6.2. There is no objection to the proposed single storey extension to the north side of the dwelling in the modified proposal. It should be noted that the extension does not involve breaking out through original historic fabric. It is not accepted that the proposed infill as far as the boundary with the adjoining property distorts and interferes with the characteristics of the existing dwelling as a detached Edwardian villa. The setback from the front building line, single storey nature, relatively simple form and finishes and limited depth provide for an acceptable extension that does not unduly adversely affect the integrity or the character and setting of the original structure.
- 6.6.3. There is no objection to the proposed single storey extension to the rear side in the modified proposal. Although the rear extension is of considerable depth it is confined to the rear within the deep rear garden, is relatively low in profile and subordinate to the original dwelling and complementary in its contemporary materials, finishes and

design detail. As in the case of the side extension, the infill as far as the boundary is acceptable. There are no issues as to potential for adverse impact on adjoining properties due to plot sizes, high boundary walling supplemented by planting.

6.7. Curtain walling system to rear façade.

- 6.7.1. It is agreed with the planning officer that the proposed curtain walling system is unacceptable notwithstanding the modifications indicated in the further information submission. The effect is to split the rear façade vertically while distorting the two storey proportions and legibility of the two floors. While the head aligns with those of the existing sash windows, the full length over both levels is unacceptable and the 'guillotine' feature fails to ameliorate this effect. The insertion of the curtain walling in the rear facade would diminish the capacity of the dwelling, with the extensions in place, to retain its legibility as a detached Edwardian house with ground and first floor levels below eaves height, beneath the roof level. The curtain walling would have significant adverse negative impact on the architectural character and integrity of the dwelling and the views of the Appellant are supported to this end. The view that the curtain walling element is essential to provide natural light to the hallway in the dwelling is not accepted on the basis that the curtain walling intervention is not justified by achievement of additional light penetration to this area within the dwelling.

6.8. Replacement dormer extension at roof level.

- 6.8.1. It is desirable for the roof profile of Edwardian Houses to front and rear originally built without fenestration be retained free from the addition of dormer extensions and it is noted that the planning status of the existing dormer element is unconfirmed. The argument that the proposed dormer element, as shown in the further information submission is an enhancement relative to the existing dormer element is questionable. The 2000 mm high long element at the eaves and form of the dormer element is a considerable insertion lacking any connectivity with the vertical and horizontal characteristics of Edwardian houses. The point made as to the lack of visibility from the public realm is acknowledged. It is considered that the proposed dormer extension would be out of character and adverse in visual impact.

6.9. **Environmental Impact Assessment Screening.**

Having regard to the nature of the proposed development and its location in a serviced urban area, removed from any sensitive locations or features, there is no real likelihood of significant effects on the environment. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

6.10. **Appropriate Assessment Screening.**

Having regard to the small-scale nature of the proposed development and, to the serviced inner suburban location, no Appropriate Assessment issues proposed development would not be likely to have a significant effect individually or in combination with other plans or projects on a European site.

7.0 **Recommendation**

7.1. In summary and conclusion, it is considered that the proposed rear and side extensions, at ground level are acceptable whereas the proposed basement curtain walling system, reconstruction of the dormer extension and removal of the wall and gate piers to the south west side of the house are considered unacceptable. A split decision is recommended in that satisfactory implementation of the proposed grant of permission for the removal of structures, alterations and cleaning and maintenance works and for the extensions independent of the elements considered unacceptable appears feasible. The proposed removal of the gate piers and walls to can be omitted by condition. Draft Reasons and considerations for a grant of permission with conditions and for a refusal of permission follow.

8.0 **Decision:**

A. **Grant Permission** for the removal of non-original structures, rear and side extensions, fuel shed, garage, garden sheds and for construction of a single storey extension at the side and rear at garden level, modifications to internal walls and opening and window opes replacement 'slimite' glazing and en-suite bathroom extension at the side cleaning and localised brick repairs, upgrades to window facades roof fabric including valleys and rainwater goods and for

landscaping works to front and rear gardens and boundary with No 79 Park Avenue.

- B. **Refuse Permission** for removal of the existing gate piers and walls at the south west side of the house, the basement extension, the reconstruction of the dormer extension in the rear roof slope and the full height curtain walling system in the rear façade.

(A) Reasons and Considerations - Grant Permission.

It is considered that subject to compliance with the conditions set out below, the proposed development would be not be seriously injurious to the historic fabric, integrity, character and, the visual amenities and setting of the existing building and adjoining buildings which are included on the record of protected structures, would not seriously injure to the visual or residential amenities of the area and would be in accordance with the proper planning and sustainable development of the area.

Conditions.

1. The development shall be carried out and completed in accordance with the plans and lodged with the application as amended by the further plans and particulars lodged with the planning authority on 12th February, 2019, except as may otherwise be required to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed.

Reason. In the interest of clarity.

2. Revised plan, section and elevation drawings showing details for the development which is authorised under this grant of permission shall be submitted and agreed in writing with the planning authority prior to the commencement of the development.

Reason: In the interest of clarity.

3. The proposed replacement wall and gate to the south west side of the house shall be omitted. The existing walls and gate piers at the shall not be removed and shall be retained and maintained.

Reason: In the interest of the protection and preservation of the integrity and architectural character and setting of the house.

4. The proposed development shall be carried out under the direction of an architect with specialist expertise in historic building conservation and in accordance with the recommendations within: *Architectural Heritage Protection: Guidelines for Planning Authorities* issued by The Department of the Environment, Heritage and Local Government in 2005.

Reason: To ensure appropriate building conservation practice the interest of the protection of the integrity of the structure.

5. Water supply and drainage arrangements, including the disposal of surface water, shall comply with the requirements of the planning authority for such works and services.

Reason: In the interest of public health.

6. Details of materials, colours and textures of all external finishes shall be submitted to and agreed in writing with the planning authority prior to the commencement of development.

Reason: In the interest of visual amenity.

7. The garage and plant room structure shall be used solely for purposes incidental to the residential use of the dwelling and shall not be sold sublet or used for commercial purposes without a prior grant of permission.

Reason: In the interest of clarity and residential amenity.

8. Hours of construction shall be confined to the hours of 0800 and 1900 Mondays to Fridays excluding bank holidays and 0800 hrs and 1400 hrs on Saturdays only. Deviation from these times will only be allowed in exceptional

circumstances where prior written approval has been received from the planning authority.

Reason: In the interest of the residential amenities of the area.

9. The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000. The contribution shall be paid prior to the commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to the Board to determine the proper application of the terms of the Scheme.

Reason: It is a requirement of the Planning and Development Act 2000 that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.

(B) Reasons and Considerations - Refuse Permission

1. Having regard to the location and inclusion of the existing dwelling and the surrounding dwellings on Park Avenue on the record of protected structures and within an are subject to the zoning objective Z2 residential Conservation Areas and, within Flood Zone according to Site 8 within the incorporated Strategic Flood Risk Assessment within the Dublin City Development Plan, 2016-2022 and to Policy 16.10.5 and Objective SI13 therein in which it is the policy of the planning authority to discourage significant underground development and excavation work basements and, extensions to existing

basement development, adjacent to residential properties in conservation areas and/or included on the record of protected structures and not to permit such development in Flood Zone A or B areas according to Policy SI13. It is considered that the proposed basement would material contravene the said development plan and would be prejudicial to public health and would set undesirable precedent for similar development. The proposed development would therefore be contrary to the proper planning and sustainable development of the area

2. Having regard to the inclusion of the existing dwelling on the record of protected structures and to the Dublin City Development Plan, 2016-2022 according to Objective CHC2 of which it is the policy of the planning authority *"to ensure that the special interest of protected structures is protected and to provide for development which conserves and enhances Protected Structures"* it is considered that the removal of the wall and gate piers to the side of the house would result in unnecessary loss of an historic feature of interest at the house, the proposed insertion of the curtain walling at full height to the eaves in the rear facade would diminish the capacity of the dwelling, with the extensions in place, to retain its legibility as a detached Edwardian house with ground and first floor levels below eaves height, beneath the roof level and that the proposed dormer extension would be disproportionate and visually obtrusive in the rear roof slope. As a result, the proposed curtain walling and dormer window would be seriously injurious to the integrity and historic architectural character of the existing dwelling and adverse negative impact on the architectural character and integrity of the existing Edwardian detached house and would therefore be contrary to the proper planning and sustainable development of the area.

Jane Dennehy
Senior Planning Inspector
26th June, 2019.