



An  
Bord  
Pleanála

## Inspector's Report ABP-307987-20.

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<b>Development</b>	Demolition of premises and construction of a 2-4 storey apartment block with 13 no. apartments.
<b>Location</b>	Church Road, East Wall, Dublin.
<b>Planning Authority</b>	Dublin City Council.
<b>Planning Authority Reg. Ref.</b>	2773/20.
<b>Applicant</b>	MKN Property Group.
<b>Type of Application</b>	Permission.
<b>Planning Authority Decision</b>	Refuse.
<b>Type of Appeal</b>	First Party
<b>Appellant</b>	MKN Property Group.
<b>Observer</b>	Steve O'Connor.
<b>Date of Site Inspection</b>	14 <sup>th</sup> January 2021.
<b>Inspector</b>	Philip Davis.

# Contents

1.0 Introduction .....	3
2.0 Site Location and Description .....	3
3.0 Proposed Development .....	4
4.0 Planning Authority Decision .....	4
4.1. Decision .....	4
4.2. Planning Authority Reports.....	5
4.3. Prescribed Bodies .....	6
4.4. Third Party Observations .....	7
5.0 Planning History.....	7
6.0 Policy Context.....	7
6.1. Development Plan.....	7
6.2. Natural Heritage Designations .....	7
7.0 The Appeal .....	8
7.1. Grounds of Appeal .....	8
7.2. Planning Authority Response .....	10
7.3. Observations .....	11
7.4. Further Responses.....	11
8.0 Assessment .....	12
9.0 Recommendation.....	20
10.0 Reasons and Considerations .....	20

## 1.0 Introduction

This appeal is by the applicant against the decision of the planning authority to refuse planning permission for the demolition of a former credit union building in the East Wall area and its replacement with a structure up to 4-storeys, containing a total of 13 apartments. The planning authority refused it for three reasons, all essentially relating to overdevelopment and a poor mix of apartment types. One observer supports the reasons for refusal.

## 2.0 Site Location and Description

### 2.1. Church Road, East Wall

The appeal site is in a long developed residential area within the docklands of Dublin, on lands reclaimed from the sea in the mid 19<sup>th</sup> Century. Older maps indicate that the area was originally laid out around the mid to late-19<sup>th</sup> Century, with Church Road, running south from East Wall Road, linking to the Royal Canal, but this road was later cut off by railway works when a number of railway threads were constructed to Goods Yards on what is now the National Convention Centre, the Point Depot (3 arena) and Alexandra Basin.

Blythe Avenue is a cul-de-sac off Church Road with residential use which predates most residential development in the area and the railway lines to the docks. When the railway lines were constructed, Church Lane was diverted south-west, running behind the houses on Blythe Avenue, resulting in the odd existing layout whereby they present their back gardens to the road and the later early 20<sup>th</sup> Century terraced houses that characterise most of the area. The overall area is mostly residential 2-storey terraced houses, with some infill older single storey dwellings, with occasional infill commercial premises.

Church Road is served by Dublin Bus route 53 (Dublin Ferryport to Talbot Street), and the main retail area is on East Wall Road, where there is a Lidl and Aldi and a number of other modern retail and fast-food outlets, these are around 600 metres from the appeal site. There is a smaller local shopping terrace on Church Road about 400 metres from the site.

## 2.2. Appeal site

The appeal site is a roughly rectangular site created at the junction where Church Road was realigned, at the western end of the Blythe Avenue terrace, with Church Road to the north and north-east, and the small Malachi Place cul-de-sac to the west. It is entirely occupied by a substantial single storey commercial building, seemingly mid to late 20<sup>th</sup> Century in origin. This appears to have been used as the office for a now relocated Credit Union. The site abuts the end of terrace house on Blythe Avenue, but otherwise faces the public highway on three sides. The site area is given on the application form as being 389 m<sup>2</sup> in area (i.e., just under 0.04 hectares).

## 3.0 Proposed Development

The proposed development consists of the demolition of all existing structures and the construction of an apartment block of between 2 to 4 storeys in height containing 13 no. apartments in total – 6 no. 1 bed apartments, and 7 no. 2 bed apartments. The application also includes for pedestrian and cyclist access from Church Road with associated works. The applicant submitted plans with a revised internal apartment layout with the appeal.

## 4.0 Planning Authority Decision

### 4.1. Decision

The planning authority decided to refuse permission for three stated reasons, which I would summarise as follows:

- It represents overdevelopment by way of its height, depth and scale and would be incompatible with the established pattern of development and would thus injure local amenities and be generally contrary to the city development plan.
- It is considered that there is an excessive number of 3-person 2 bed apartments, and as such represents a substandard type of development.

- It is considered that the site has a substandard provision for communal and private open space.

## 4.2. Planning Authority Reports

### 4.2.1. Planning Reports

- It is noted that it is within a Z1 residentially zoned area.
- It notes that a number of objections were submitted – these objections are summarised on a separate sheet with 26 signatories, all Blythe Avenue, Church Road, and Malachi Place residents.
- Policies as set out in the City Development Plan and the Sustainable Urban Housing Guidelines are summarised.
- Serious reservations are outlined about the provision of a 4-storey level at this site.
- It is considered that the proposed 3 person 2-apartment units could be acceptable in some circumstances (social housing) but are not considered an acceptable level of variation in housing type for this area.
- It is noted that the site has no communal open space provision, this is not considered acceptable.
- The concerns of the transportation planning division are outlined, in particular the absence of car parking spaces in an area with existing uncontrolled on street parking.
- An AA and Screening assessment are summarised, neither a Stage 2 AA nor an EIA are considered to be required.
- The report concludes that while an appropriately sized apartment development would be appropriate having regard to the nature of the area, the proposed development is sub-standard, and a refusal is recommended.

#### 4.2.2. Other Technical Reports

##### **Transportation Planning Division.**

- Notes Irish Rail and TII submissions.
- It is considered that there is insufficient information on details for the main site entrance.
- Concerns are expressed at the absence of any carparking spaces.
- The bike store is considered generally acceptable in design and layout, but the quantum of spaces provided is considered to be below guideline levels.
- Notes that no Construction Management Plan was submitted.
- Recommends that additional information be requested regarding car parking provision, additional drawings for the exit, and an additional quantum of parking spaces is required, in addition to a preliminary Construction Management Plan.

##### **Drainage Division**

- The area is considered to be vulnerable to flooding, additional information is requested.

##### **Housing**

- A memo on file indicates that an agreement in principle on Part V requirements has been made.

#### 4.3. Prescribed Bodies

##### **Iarnrod Eireann**

- Notes the requirement under the Railway Safety Act 2005 to ensure all works next to a railway should not increase risk on the railway.
- The applicant should be aware of normal vibrations and noise emanating from railway operations.
- A quantified noise assessment should be conducted, and noise suppression measure should, if necessary, be applied to the development.

- The Developer should be required to inform all future purchases that the site is adjacent to a railway operated 24 hours a day, 7 days a week.

### **Transport Infrastructure Ireland**

- The proposed development is within an area subject to a Section 49 Supplementary Development Contribution Scheme – Luas Red Line Docklands Extension.

### **Irish Water**

- A letter on file to the applicant states that a connection to the Irish Water network can be facilitated.

#### **4.4. Third Party Observations**

A number of submissions from local residents objected for a wide number of reasons, including over development, overlooking, impact on amenities, and car parking.

#### **5.0 Planning History**

There are no records of previous planning applications or appeals on file.

#### **6.0 Policy Context**

##### **6.1. Development Plan**

The site is zoned Z1 (existing residential) in the current Dublin City Council Development Plan. Policy on residential standards applies. There are no protected structures or other specific designations on the lands or adjoining lands. The houses on Blythe Avenue are zoned Z2 (residential conservation area).

##### **6.2. Natural Heritage Designations**

The site is on reclaimed land within Dublin Bay and within 1 km of the South Dublin Bay and River Tolka Estuary SPA, site code 004024. It is within the catchment of the Liffey which discharges to the SPA's and SAC's of the Bay.

## 7.0 The Appeal

### 7.1. Grounds of Appeal

- In a very lengthy submission with technical appendices, the applicant outlines the overall site context, noting the mix of houses and commercial in the area and that many houses in the area have been extended to their rears. It is also noted that the site is well served by a range of community and retail amenities.
- Notes a number of similar developments permitted by the planning authority and ABP on similar sites in the East Wall/Sherriff Street area (Refs 3626/04;5228/06; 304710 and 306778).
- With regards design and use, it is noted that the Credit Union remains part of the local community but is relocating and so leaving a monolithic structure on the site with no obvious alternative uses.
- Issues of design are highlighted, and it is argued that there is no demonstrable impact on local amenities by way of overlooking windows/ balconies or overshadowing.

#### With regard to reason 1 for refusal:

- It is noted that National, Regional and Local Guidelines emphasise the importance of encouraging higher housing densities in well serviced areas.
- It is argued that the context and nature of the site allows for a high-density development and that the design is an appropriate response to the context, and emphasises that the proposed building follows existing building lines.
- It is noted that while most buildings in the area are 2-storey, this does not reflect the wider context where there is a greater mix of building heights.
- It is noted that most of the adjoining buildings have little or no private space to the rears due to incremental extensions, and as such the proposed development would not impact on amenities by way of overshadowing (daylight/sunlight analysis report submitted).



- In elaboration of further arguments that the overall size and scale is appropriate in the context, a number of photographs (including aerial photos) are attached, and examples are shown of other developments in the vicinity, in particular on Hawthorne Avenue which are considered to be relevant precedents.

With regard to reason 2 for refusal:

- It is argued that it is not excessive to have 14 no. apartments of the size submitted, and notes the requirement in the Sustainable Urban Housing guidelines for '*flexibility in respect of dwelling mix in small scale building refurbishment and urban infill development schemes*'. It is noted that the Guidelines call for discretion on a case-by-case basis, having regard to the overall quality of a proposal.
- A number of amendments are submitted, with Table 2 (page 21 of the appeal document) indicating the alteration in the balance of sizes of apartments. These changes do not alter the number of apartments or the external appearance but change the apartment mix from four no. 3 person apartments and three no. 4 person apartments to two no. 2-bedroom apartments and five no. 4 person apartments (reducing two 1 no. bed apartments to studio units).
- It is acknowledged that to strictly follow the 10% rule set out in the CDP, there should be only one 2-bed, 3 person unit, but the Board is requested to have regard to the nature of the locality and site. A Housing Quality Assessment is attached with the appeal in support of the argument that interior amenity is of a good quality.
- It is further argued that contrary to what is stated in the Reason for Refusal, there is no evidence that there would be any depreciation of property values in the area.

With regard to Reason 3:

- Revised plans submitted to the Board show private open space provision that is claimed to be in accordance with the Sustainable Urban Housing

Guidelines – table 2.3 on page 23 of the appeal submission summarises the quantum provided per unit.

- It is acknowledged that the design appears substandard with regard to communal space, but it is argued that with regard to provisions of the Development Plan (references section 16.10.10) and the overall size of the site and the local context, that the overall provision is acceptable.

#### Other issues

- With regard to the comments by the Transportation Section on the file, it is argued that the local footpaths (at 1.8 metres) are consistent with DMURs.
- With regard to the absence of parking, a letter of support from GoCar is attached, details are included of local GoCar bases.
- With regard to comments on biking parking, the provision of secured bike parking spaces has been increased to 20 – it is noted that there are a number of ‘Bleeperbike’ parking locations in the vicinity. Details are also submitted of a two-tier cycle storage solution which could be used to increase the number of bike spaces.
- A ‘Construction and Operational Waste Plan’ is submitted to demonstrate that the site can be served with adequate bins, in addition to providing further details on construction waste management.
- With regards to Drainage Department comments, a report is submitted addressing flooding issues – it is argued that while the area is low in elevation, the area is a defended flood risk area, and the F.F.L at 0.7 metres is considered acceptable in such areas.
- The response then argues in some detail that the proposed development is consistent with the broad framework of national, regional and local planning policies.

## **7.2. Planning Authority Response**

The planning authority did not respond to the specific issues raised in the appeal.

### 7.3. Observations

#### Steve O'Connor of 167/8 Church Road

- Supports the decision of the planning authority to refuse permission.
- It is argued that it is out of scale and proportion with the existing neighbourhood.
- The absence of parking spaces is noted.
- It is submitted that it will overlook and overshadow neighbouring properties.
- It is argued that the junction is dangerous and construction works will be a hazard.
- It is argued that there is inadequate sewerage and drainage for the area and the proposed development would put unacceptable strain on local infrastructure.
- It is noted that the area suffered flooding in 2002, and states that the proposed development does not address this issue.
- In detailed observations on the attached technical reports, the observer makes a number of comments querying the assumption that the new residents would be largely cyclists or public transport users, the appropriateness of the precedents presented by the applicants, and also questions whether the public transport links are as good as claimed by the applicant.
- It is noted that the AA Screening Report references an address in Howth.
- A one page list of local residents supporting the Observation is attached.

### 7.4. Further Responses

None on file.

## 8.0 Assessment

Having inspected the site and reviewed the file documents, I consider that the appeal can be addressed under the following general headings

- Preliminary comments
- Principle of Development
- External envelope/design context
- Internal design and amenity
- Residential amenity
- Parking and traffic
- Railway issues
- Conservation issues
- Flooding
- Appropriate Assessment
- Other issues

### 8.1. Preliminary comments

In addition to significant numbers of supporting technical documents, the applicant, in his appeal against the decision to refuse, submitted revised designs and layout. These revisions do not have a significant impact on the external appearance of the structure, and they do not substantively alter the development as described on the site notice, so I do not recommend that these require re-advertising. For clarity, I will be addressing my assessment primarily to these submitted plans and documentation as it is clear that they do address some of the issues raised by the planning authority in its decision.

### 8.2. Principle of Development

The proposed development is in a residentially zoned area within a long established inner suburban/urban community. The site is commercial in nature, but it does not seem likely given the size and location that another commercial user would be found for a premises of this nature. The building, although well maintained, has no

specific historic or cultural or heritage value, although the adjacent houses on Blythe Avenue are zoned Z2, as a residential conservation area.

The National and Regional context is set out in a number of documents, including *Project Ireland 2040; Rebuilding Ireland (2016)*; the *Urban Development and Buildings Heights Guidelines for Planning Authorities (December 2018)*; the *Sustainable Urban Housing Guidelines (2018)* and the *Regional Planning Guidelines for the Greater Dublin Area 2010-2022*, in addition to related guidelines and circulars such as DMURS. These policies consistently set out policy objectives for promoting high quality residential uses within existing urban areas at significantly higher densities than has been the norm in the past.

In Z1 zoned areas the Development Plan (Dublin City Development Plan 2016-2022), following national guidelines identifies such infill/redevelopment sites as appropriate for residential development with a strong policy emphasis on raising density within such areas if they are served by appropriate services. The proposed development, with 14 units on less than 400 square metres, represents a very high density, but there is no maximum density set for such areas in the Development Plan or other Guidelines.

I note that the 2018 standards for New Apartments were updated in late 2020, after this appeal was made, but I do not consider that the revised Guidelines are relevant to the issues in this appeal.

The site is close to the city centre, albeit somewhat separated due to the small number of crossings of the railway lines, and is served by one bus service, the feeder between Dublin Ferryport and Talbot Street. To the south, a Luas Station (Spencer Dock) is 700 metres by foot (10 minute walk), Clontarf Dart Station is 1.6 km by foot (20 minutes), as is Connolly Station – the East Wall Business Park is a similar distance. In the immediate vicinity, there is a small terrace of local shops on Church Road, about 400 metres from the site, and a pair of small supermarkets (Lidl and Aldi) with some associated shops on East Wall Road, just 600 metres distance (7 minutes walk). I would therefore consider the area to be generally central and well connected with public transport, and as such policy would point to a density at the higher range and more flexibility when it comes to applying some quantitative standards.

Having regard to the location and nature of the site, I therefore conclude that the principle of a high-density residential use to replace the existing use/structure is in accordance with national, regional and local policies and guidelines and the zoning designation, subject to design guidelines set out in the Development Plan for apartment dwellings, normal planning considerations, and the broader statutory context.

### **8.3. External envelope/design context**

The site is within a long established inner suburban area of Dublin, characterised primarily by small terraced and semi-detached 2-storey dwellings – some date from the late 19<sup>th</sup> Century or early 20<sup>th</sup> Century, but almost all development in the area – which is on land reclaimed from Dublin Bay – took place in the mid-20<sup>th</sup> Century. The area is to some extent functionally cut off from the rest of the city and the docklands area by the main Dart Line and goods lines extending to the Liffey and Dublin Bay – there are relatively few crossing points into the area. There are scattered commercial developments in the area, often on small or backland sites. There are some more recent developments, mostly to the north around the East Wall Road (R131) and on East Road, where there have been significant commercial/retail developments, in addition to a number of generally small apartment blocks and infill developments. The area is noticeably deficient in private and public open space and I note that many if not most of the houses in the area have built over their rear and side gardens to some degree.

The site and the immediate area has an unusual layout, mostly the result of the original Church Road, which extended to the Liffey, being cut off and diverted due to the construction of railway lines for goods transport to the main Dublin Port area. The result of this left a small terrace of attractive older houses (Blythe Avenue) somewhat isolated against the line, with the appeal site forming an irregular shaped area that seemed to have been more or less left over after Church Lane was diverted to the east. This has been occupied for some years by a Credit Union premises, now closed.

The site is quite visible and prominent in the area, especially when viewed down Church Road. This long, straight avenue has no visual stop point at the end, where it is marked simply by high fences along the railway and some overhead catenary.

The large apartments around Spencer Dock can be seen at a distance. Otherwise, the area is characterised by a mix of 1 to 2 storey structures with quite a haphazard mix of styles and roof patterns. The only nearby exception to this pattern is a mews of 3-storey modern terraced houses on Hawthorne Avenue, a small laneway about 50 metres north-west of the site. The closest larger buildings would be the larger apartment blocks built within the past few years on the east side of East Road about 500 metres to the north-east of the site.

The overall design of the proposed apartments is contemporary and generally well suited to such a location. Having regard to overall policy to increase density and variety in existing urban sites, I consider that it would not visually detract from the vicinity and would significantly improve the vista down Church Road. I consider that a well-designed 4 storey structure to be appropriate in principle for the site, and in overall form and bulk and external appearance, I do not consider that the proposed development detracts from the area.

#### **8.4. Internal design and amenity**

The main reasons cited in the grounds for refusal relate to internal amenities, specifically the number of small (i.e., 3 person) 2-bedroom apartments. The revised submission from the applicant brings the mix in line with Development Plan guidelines, albeit by creating some studio units. Each unit conforms to the minimum guideline limit for internal space and private green space (balconies). There is a small bike lockup and waste collection area (the applicant claims that both fulfil the minimum requirements, although having regard to the comments on file by the Transportation Division and the Planning Report, this is somewhat ambiguous. The small site has been essentially filled to the maximum with a very high density of residential units. It has no internal parking provision and no communal open space. I consider that in a number of contexts, maximising the use of such space is entirely acceptable, and in the inner-city core there are a number of high-quality developments that take advantage of the plentiful supply of local infrastructure and services to function well as liveable spaces while falling below guideline levels in communal open space, parking, etc. The key question in this appeal, in my opinion, is whether the overall context for this apartment building justifies such an approach.

To a degree this is a subjective judgement, as the site is in an unusual location, somewhere between the high-density docklands area, the inner suburbs, and the traditional urban core. However, in coming to my recommendation, I have had particular regard to two issues with the site:

First of all the paucity of open space in the area. There is one small urban green nearby (the green in Russell Avenue, which is entirely covered with an all-weather sports ground), but otherwise the primary area of open space is Fairview Park, which is, at 1-km distance, 12 minutes or so walk from the site. The area is significantly deficient in smaller formal or informal open spaces.

Secondly, while there are a range shops in the area, the site is still some distance from a more traditional shopping main street or mall.

I do note in favour of the scheme that it is within walking distance of a number of major employment zones, such as around docklands and the East Point Business Park, but on balance I do not consider that this outweighs the overall issue of such a very high density development on a very small site. I also note the potential amenity issues of having a significant number of the apartments being single aspect facing north, and the southerly aspect apartments overlooking a goods railway line.

**I therefore conclude that the overall development represents a substandard form of residential development by way of the excessive number of small single aspect units along with an absence of communal space.** I concur therefore with the overall thrust of the planning authority's decision.

#### 8.5. Residential amenity

The site directly adjoins no. 45 Blythe Avenue and is within around 20 metres of several other properties on Malachi Place, Blythe Avenue and Church Road. Most of the nearby dwellings face south-south-west, with north-north-east facing rear gardens. Almost all the rear gardens/yards in the area have been built up to some degree with single storey returns, extensions, sheds, or other such structures. I note visual evidence that during good weather many residents on Church Road East seem to favour the south facing front gardens for sitting outside.

The Observer, along with other submissions during the planning application, raised concerns about overlooking and overshadowing of their properties. I am satisfied



however that there is no direct overlooking of any private spaces on adjoining properties, and that while there would be an element of shadow cast in late summer evenings to the rears of no.45 and 44 Blythe Avenue, this would not have a significant amenity impact on those properties.

#### **8.6. Parking and traffic**

The area was largely developed during the mid-20<sup>th</sup> Century with minimal provision for parking, with just a few of the houses having curtilage parking. The area therefore suffers from the familiar problem of such estates with haphazard street parking, much of it illegal. Local footpaths are minimal with regard to existing standards, made more minimal by widespread parking on the footpaths, but in general the area is walkable. I note that a condition may be required regarding possible upgrades to the footpath immediately adjoining the site if permission is granted.

The appeal site has no provision for carparking, just a well designed and secured bike facility. I would consider this to be acceptable within an urban core area – and there are precedents for such developments - but I would question whether realistically the proposed development will not result in at least a small number of additional cars added to quite a chaotic situation. The applicant has submitted details such that future residents will have access to GoCars and Bleeperbikes, and it would seem likely that most future residents of a residential scheme such as this would not be car owners/users. Notwithstanding this, the absence of even one disabled space or similar for 14 no. units is a significant concern. I would not recommend this as a reason for refusal, but I would note that combined with the minimally scaled bike lock-up and lack of communal areas, this contributes to what I consider to be a substandard level of development.

#### **8.7. Railway issues**

I note the submission by Iarnod Eireann on the original application, recommending several conditions relating to construction and the notification of future purchases of the proximity of a railway that operates (at least theoretically) 24 hours a day, 7 days

a week. If the Board is minded to grant permission I recommend that conditions be set in line with the request by Iarnod Eireann.

#### **8.8. Conservation issues**

The site adjoins a terrace of late 19<sup>th</sup>/early 20<sup>th</sup> Century dwellings that are zoned Z2 (conservation area) in the Dublin City Development Plan. There are no protected structures in the vicinity. The existing structures do not have any conservation value. The site is on land reclaimed in the late 19<sup>th</sup> Century from Dublin Bay, using unknown materials for infill, so there is a very low possibility of the underlying layers having archaeological value.

I do not consider that the design significantly impacts on the Z2 area or those dwellings, so I do not consider that any conservation issues arise.

#### **8.9. Flooding**

The applicant submitted an Engineering Report with the appeal which addresses some of the issues raised by the planning authority in the application. The site is on low lying reclaimed land between the Tolka River and the Liffey/Lyereen/Rye Water catchments. The Observer has stated that the area has flooded in the past, although the OPW records do not show this site as having flooded. The applicant notes that significant protective works have been carried out for the catchment, and no doubt as sea level rises more will be needed.

I would consider that there is no impediment to developing the site having regard to its past use and the potential for engineering out any problems. Notwithstanding this, I am concerned that the applicant has not fully addressed all possible eventualities, and I would recommend that if the Board is minded to grant permission, the Drainage Division of the City Council is consulted specifically on the matter of requirements for flood protection, particularly if the ground levels of the site would need to be elevated.

#### **8.10. Appropriate Assessment**

The appeal site is on reclaimed land within Dublin Bay, and within 1-km of the South Dublin Bay and River Tolka Estuary SPA, an area of tidal mudflats designated under

the Wild Birds Directive for its importance for a number of shore feeding birds including the oystercatcher, Plover, Dunlin, in addition to several species of Goose and Tern. The site has no ecological value except perhaps as an occasional bird roost, and the proposed development would be connected to the public water supply and sewerage system. There are therefore no pathways for pollution or other impacts, and the site has no associated value for the birds listed under the Qualifying Interests or the related conservation objectives.

I note the issue raised by the Observer that the Screening submitted to the planning authority appeared to be little more than a copy and paste submission from another development – one in Howth. It is therefore reasonable to suppose that the planning authority simply adopted a fairly minimalist approach at best to the question of whether there would, in fact, be any significant effects on the qualifying interests on any designated sites in the area. Notwithstanding this, it is clear from my site visit and the information on file that the site has no habitat value, it is not functionally connected to any designated nearby habitats or qualifying interest species, and there are no pathways for pollution.

It is therefore reasonable to conclude that on the basis of the information on the file, which I consider adequate in order to issue a screening determination, that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on European Site No. 004024, or any other European site, in view of the site's Conservation Objectives, and a Stage 2 Appropriate Assessment (and submission of a NIS) is not therefore required.

#### **8.11. Other issues.**

The site is served with existing foul and drainage water and the public water supply, so I do not consider that there are issues with regard to services.

I note that the site would require an additional Section 49 Supplementary Development Scheme contribution in addition to a normal development contribution.

I do not consider that there are any other substantive issues raised in this appeal.

## 9.0 Recommendation

I recommend that the proposed development be refused permission for the following reasons and considerations.

## 10.0 Reasons and Considerations

Having regard to the restricted size of the site, and the overall pattern of development in this area, it is considered that the proposed development represents an overdevelopment of the site by way of an excessive number of apartment units, in particular of units with a single aspect facing generally north, which, in conjunction with the absence of communal open space and a minimal provision of other facilities within the proposed development would result in a substandard level of amenity and services for future residents. The proposed development would therefore seriously injure the residential amenities of the area, would represent overdevelopment of the site, and would otherwise not be in accordance with the proper planning and sustainable development of the area.

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Philip Davis

Planning Inspector

18<sup>th</sup> January 2021