



An  
Bord  
Pleanála

## Inspector's Report ABP310791-21

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<b>Development</b>	Demolition of existing buildings and the construction of a 6-storey mixed use development accommodating restaurant at ground floor level and 18 residential units above and all associated site works.
<b>Location</b>	The Washerwoman Restaurant and Nos. 60-66 Glasnevin Hill, Dublin 9.
<b>Planning Authority</b>	Dublin City Council.
<b>Planning Authority Reg. Ref.</b>	2635/21.
<b>Applicants</b>	SRM Book and Cook Limited.
<b>Type of Application</b>	Permission.
<b>Planning Authority Decision</b>	Refuse.
<b>Type of Appeal</b>	First Party -v- Refusal.
<b>Appellants</b>	SRM Book and Cook Limited.
<b>Observers</b>	(i) Glasnevin Village Residents Association, (ii) Geraldine Gough, (iii) Matt and Mary Robinson, (iv) Eileen Keenan.
<b>Date of Site Inspection</b>	21 <sup>st</sup> September, 2021.
<b>Inspector</b>	Paul Caprani.

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## 1.0 Introduction

ABP310791-21 relates to a first party appeal against the decision of Dublin City Council to issue notification to refuse planning permission for the construction of a six storey mixed use residential development at the Washerwoman's Restaurant, 60 – 66 Glasnevin Hill, Dublin 9. Dublin City Council issued notification to refuse planning permission for four separation reasons which refer to

- the poor-quality design of the development which does not provide appropriate residential amenity to future residents,
- the over reliance of public lands to support the transport needs of the development which would give rise to haphazard parking in the area,
- the overall excessive height, bulk and massing of the development and the contention that the existing building at Nos. 60 – 66 Glasnevin Hill is one of the last surviving remnants of the early buildings of Glasnevin Village which makes a positive contribution to the streetscape and would result in the removal of a building of important historical heritage from the area.

A number of observations were submitted supporting the decision of the planning authority.

## 2.0 Site Location and Description

- 2.1. The subject site is located on the southern side of Glasnevin Hill in the suburban area of Glasnevin approximately 3.5 kilometres north of Dublin City Centre. The site is located on the southern side of Glasnevin Hill and faces northwards onto St. David's Terrace and the Met Eireann building. The wider area surrounding the site comprises of a mixture of early 20<sup>th</sup> century terraced red brick housing, former industrial buildings and largescale institutional lands to the south-west of the site. The site is irregularly shaped and currently accommodates a two-storey structure occupied by a number of commercial units including the Washerwoman Restaurant and a separate Pizzeria. And independent creche facility is located in a separate building to the rear of the restaurant. This is accessed through an archway located

centrally within the block of buildings that form the application site. To the immediate north-west of the archway is a real estate unit at ground floor level that does not form part of the current application. The site has a stated area of 555 square metres (0.0555 hectares).

- 2.2. Lands to the west and south comprise of institutional lands associated with the Convent of the Sisters of the Holy Faith. Lands to the east of the site currently accommodate a large vacant commercial building which was previously used as a motor showroom and retail outlet (Glasnevin Motor Group). Glasnevin Hill is a two-way public carriageway with no on-street car parking permitted in the vicinity of the subject site. Partial cycle lanes are located along the roadway to the front of the site.
- 2.3. The site itself comprises of an amalgamation of one and two storey buildings. The Washerwoman Restaurant is a two-storey structure to the south-east of the site which accommodates a restaurant at ground and first floor level. It incorporates a fine stone exterior which possibly dates from the mid-18<sup>th</sup> century. The upper floor above the pizzeria and real estate which forms part of the current application accommodates a two-bedroomed residential unit. The creche facility to the rear of the site includes a number of playrooms, sleep room, a kitchen and ancillary accommodation.
- 2.4. Planning permission has been granted for 101 residential units under the provision of SHD on the adjoining site to the east and south-east (Reg. Ref. 308905-20).

### **3.0 Proposed Development**

- 3.1. Planning permission is sought for the following on the subject site. The demolition of all existing structures on site and a new mixed-use development to accommodate a restaurant use, kitchen and ancillary areas including customer toilets at ground floor level with residential units on the floors above. The former pizzeria in the north-western portion of the site is to accommodate a bike store associated with the residential units overhead. The entrance to the apartment's overhead is to be located adjacent to the main entrance to the restaurant centrally on the front elevation. At first floor level it is proposed to provide four separate one and two-bedroomed residential units set around a central lobby area. An additional four residential units incorporating a similar but not the exact same layout are proposed on the second,

third, fourth and fifth floor above. The fifth floor incorporates a setback with a 1.6 metre wide balcony area on the front elevation. The external elevation is to incorporate a mixture of timber fins with a concrete finish and glazing. The building is to rise to a maximum height of c.22.5 metres.

- 3.2. In total it is proposed to provide 18 apartments above the restaurant. The unit mix comprises of 8 one-bedroomed apartments, 9 two-bedroomed apartments and 1 four-bedroomed unit with associated private open space and two bedrooms in a four-bedroomed unit are to be provided at fifth floor level. Figure 27 of the Planning Report submitted with the application provides a photomontage of the proposed design of the development.

#### 4.0 Planning Authority's Decision

Dublin City Council issued notification to refuse planning permission for four separate reasons. These reasons are set out in full below.

1. *The proposed development would not provide appropriate residential amenity to future residents due to the poor quality of the north-facing private open space to the majority of the apartments, the number of bedrooms facing blank walls at short distances and the lack of any communal open space. The proposed development would therefore be contrary to the Design Standards for New Apartments (2020), Ministerial Guidelines issued to Planning Authorities under Section 28.*
2. *The proposed development, with no visitor parking or set down parking and insufficient cycle parking, demonstrates an overreliance on the public realm lands to support the transport needs of the development, and would likely lead to an overspill of parking with impacts on surrounding residential amenity, and lead to haphazard parking which would result in potential vehicular and pedestrian conflict to the front of the site.*
3. *By reason of its excessive height, bulk, massing, footprint and incongruous design, the proposed development would fail to successfully integrate into or enhance the character of the streetscape and would seriously injure the visual amenity and setting of Glasnevin Village and the setting of protected structures (No. 49 Beechwood (RPS Ref. 3230) and the Convent of the*

*Sisters of the Holy Faith (RPS Ref. 3231)). Furthermore, the applicant has not set out how the development proposal complies with the criteria set out in the Urban Development and Building Height Guidelines (December 2018) and the proposed development with a height of 21 metres would materially contravene the Dublin City Development Plan 2016 – 2022.*

4. *The building at No. 60 to 66 Glasnevin Hill is one of the last surviving remnants of early buildings of Glasnevin Village and makes a positive contribution to the streetscape and the understanding of architectural, historical and cultural development of the village. Its demolition would be contrary to Policy CHC1 of the Dublin City Development Plan 2016 – 2022, to seek the preservation of the built heritage of the city that makes a positive contribution to the character, appearance and quality of local streetscapes and the sustainable development of the city and contrary to Section 16.10.17, which states the Planning Authority will actively seek the retention and reuse of buildings/structures of historic, architectural, cultural, artistic and/or local interest or buildings which makes a positive contribution to the character and identity of the streetscape and the sustainable development of the city.*

#### 4.1. **Documentation Submitted with the Planning Application**

- 4.1.1. The application was accompanied by the mandatory planning application form, public notices, the planning fee and drawings etc. as well as the following reports. In addition the following documents were also submitted:
- 4.1.2. A **Planning Report** prepared by Hughes Planning and Development Consultants which sets out details of the site description, the pre-planning consultation, the planning history associated with the site and surrounding sites where it is argued that there are numerous precedent decisions for developments of a similar size and scale to that proposed on the current site. The Planning Report goes on to assess the proposed development in terms of its impact on surrounding residential amenity. It is considered that the proposed development will not give rise to any overlooking or overshadowing of surrounding buildings and the overall design is considered to be harmonious with the surrounding area. It is argued that having regard to the lack of any hydrological connection with Natura 2000 sites in the vicinity, a Stage 2 Appropriate Assessment is not required in this instance.

- 4.1.3. Also submitted was a **Drainage Report** which sets out details of the surface water drainage system, the foul water drainage system and the potable water supply. It also notes that maps published within the Strategic Flood Risk Assessment for the Dublin City Development Plan indicates that the site is not located within an area susceptible to fluvial flooding. The site however is susceptible to pluvial flooding during a 1:100 year storm event. While the proposed development is considered to be a highly vulnerable development however it is to be constructed within a Flood Zone Type C area and therefore a justification test is not deemed necessary. Along with the implementation of SuDS measures it is considered that the proposal will not contribute to increased flood risk to the site or its surrounding areas. It is stated that surface water drainage would be facilitated by a 225-millimetre pipe which will connect to the public sewer of Glasnevin Hill. A new foul sewer is to be facilitated by a 150-millimetre pipe before being discharged to an existing Irish Water manhole on Glasnevin Hill.
- 4.1.4. A **Traffic and Transportation Statement** argues that the site is located in a highly accessible location accessible via bus, future Metro link and within walking distance of employment zones. The area is characterised by low car ownership rates and high rates of alternative modes of transport other than the car are used for commuting purposes. The locality has free on-street parking and is considered trip generation from the proposed 18 apartments is negligible. A travel plan sets out a strategy to promote modal shift to more sustainable modes of travel and this is in keeping with local and national policy.
- 4.1.5. A separate **Sunlight, Daylight and Shadow Assessment** was submitted. It indicates that when tested the skylight assessment of the vertical sky component indicates that the proposal complies with BRE Guidelines and that all relevant and tested windows pass the annual probable sunlight hours and winter probable sunlight hour requirements. It is also demonstrated that no gardens in the vicinity would be impacted by the proposed development. In terms of average daylight factor, all tested living rooms and bedrooms exceed the minimum requirements and all tested amenity spaces facing south receive over 2 hours of sunlight over 50% of their area at the vernal equinox (March 21<sup>st</sup>). It is concluded therefore that the application generally complies with the recommendations and guidelines of site Layout Planning for Daylight and Sunlight BRE 2011 and BS8206.

4.1.6. Finally, a set of verified **Photomontages** have also been submitted with the application. The photomontages depict the visual impact arising from the development at three separate points along Glasnevin Hill.

## 4.2. **Planning Authority Assessment of the Proposed Development**

### 4.2.1. Observations

A large number of observations were submitted the contents of which have been read and noted. These observations express concerns that the proposed development is of an inappropriate scale and height, will result in the loss of the historic fabric of Glasnevin Village, will result in the loss of a creche, will give rise to significant traffic and parking problems and will impact on surrounding residential amenity.

A report from the **Conservation Officer** of Dublin City Council incorporates detailed cartographic evidence of buildings located on the site and detailed description of the existing building and its significance. The report expresses concerns in relation to the removal of the existing Washerwoman building. It is suggested that the building and the adjoining gabled ended structure to the immediate north-west to be of far greater architectural character and cultural interest than that described in the planning application submitted. Concerns are also expressed that the proposed building design would be monolithic and would not be reflective or sensitive to the historical, architectural and tourism context at this location. On the basis of the above it is recommended that permission be refused for two reasons which are set out in the report.

4.2.2. A report from the **Environmental Health Officer** recommends a number of conditions in relation to noise control and air quality.

4.2.3. A report from the **Transportation Planning Division** states that the Division would have concerns regard the provision of zero car parking for the residential and commercial scheme proposed. It is argued that this would result in a potential overspill or haphazard parking in the immediate area. Concerns were expressed that the development will continue to rely solely on bus services as other public transport infrastructure will not be available in the short to medium term.



- 4.2.4. A report from the **Engineering Department Drainage Division** stated that there is no objection to the proposed development subject to standard conditions.
- 4.2.5. A report from the **City Archaeologist** states that the proposed development is within the border of a zone of archaeological constraint for the recorded monument DU018-005. It is therefore recommended that a condition be attached to any grant of planning permission requiring archaeological monitoring.
- 4.2.6. The planner's report assesses the proposed development in terms of:
- Height, scale, design, visual impact.
  - Density, site coverage and plot ratio.
  - Residential quality standards.
  - Impact on neighbouring properties.
  - Transportation issues.
  - Public open space.
  - Archaeology and built heritage and natural heritage.
- 4.2.7. The report concludes that while the site may be appropriate for residential and commercial development there are a number of deficiencies in the application. No conservation assessment has been undertaken for the existing building and no justification has been put forward for its demolition.
- 4.2.8. The lack of car parking is also a concern in this suburban location. The lack of any housing quality assessment or proposal for a contribution in lieu of public open space is also of concern. Further information is required in relation to the footpath to the front of the site and the impact of the proposal on archaeology. Concerns are expressed with regard to the overall quality of residential amenity and this compromises the overall design and on this basis it is recommended that planning permission be refused for the proposed development.

## 5.0 **Planning History**

- 5.1. No history files are attached.

- 5.2. The planner's report makes reference to a number of planning applications which are briefly set out below.

Under 1973/95 planning permission was granted for a change of use of ground floor of No. 60 to 62 from offices to coffee shop with new kitchen store, staff room and toilets etc. to the rear.

Under Reg. Ref. 0224/88 planning permission was granted for a change of use from a shop to a take-away café and the erection of associated signage.

Under Reg. Ref. 2351/97 planning permission was granted for a porch to the front of the Washerwomen's Restaurant.

## **6.0 Grounds of Appeal**

### **6.1. First Party Appeal**

- 6.1.1. The decision of Dublin City Council to issue notification to refuse planning permission was the subject of a first party appeal on behalf of the applicant by Hughes Planning and Development Consultants.
- 6.1.2. As part of the planning appeal the Board is requested to consider an alternative design which in summary includes the provision of four duplex apartment units at first and second floor level. The residential units have also been revised at upper floor levels to improve the internal circulation and amenity of the units. The ground floor level of the scheme has been revised to provide an increased number of cycle parking spaces and this is being facilitated by the reconfiguration of the floor plan. It is submitted that the alternative design increases the quality and aspect of the residential apartments in response to the Planning Authority's concerns. It is requested that the Board consider the application as lodged with Dublin City Council and in the event that the Board agree with the Council's assessment, it is requested that an alternative design proposal as put forward is assessed. The grounds of appeal go on to set out details of the planning history and other sites along Glasnevin including the grant of planning permission for the five to six storey development approved by An Bord Pleanála under Reg Ref ABP 308905-20.
- 6.1.3. The grounds of appeal go on to argue that the proposed development is acceptable in terms of the principle and nature of the development on the subject site, the

development height, the design and layout and the visual impact. It is also argued that a reduced car parking provision is acceptable for the development due to the proximity of Dublin Bus routes. Extensive reference is made to the planning inspector's report in respect of ABP308905 where planning permission was granted on the adjoining site to the south-east for 101 apartments.

6.1.4. The grounds of appeal go on in Section 5 to contend that the proposed development complies with the policies and objectives set out in the Dublin City Development Plan and also complies with the zoning objectives set out in the Plan. The grounds of appeal also argues that the proposal meets many of the land use objectives set out in:

- Project Ireland 2040 (National Planning Framework).
- The National Development Plan (2018 – 2027).
- The Action Plan for Housing and Homelessness.
- The Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019 – 2031.
- The Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009).
- The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020).

6.1.5. The proposed apartment design is assessed with the standards set out in the New Apartment Guidelines in respect of minimum overall apartment areas, minimum bedroom sizes, dual aspect ratios, floor to ceiling heights, bicycle parking, lift and stair cores and minimum private open space requirements. The development is also assessed in accordance with the Urban Design Manual: A Best Practice Guide and in particular the 12 criteria set out in the manual. It is argued that the proposed development fully meets the criteria set out.

6.1.6. Specifically in respect to refusal reason no. 1 it is stated that the sunlight, daylight and shadow assessment report submitted with the planning application which indicates that in terms of average daylight factor the development complies with requirements set out in the BRE Guidelines in relation to light distribution. It also states that in respect of private amenity areas, the report concludes that non-north

facing private amenity areas pass the BRE requirements. The north facing units which do not receive as much light to their private amenity areas have been prioritised with sunlight to living rooms to ensure that the sunlight penetration factor is high. In terms of dual aspect arrangements, it is considered that the majority of the apartment units could be classed as dual access. The scheme also comprises of a development on a site less than 2.5 hectares and thus the required number of dual aspect units falls to 33% and this has been well exceeded. Furthermore, the alternative design option incorporating four duplex units on the first and second floors ensures that the aspect afforded to the number of units is increased.

- 6.1.7. In relation to the second reason for refusal which relates to car parking provision, it is stated that the site is considered to be highly accessible by public transport and the further Bus Connects Scheme will further introduce a high frequency bus route to the Glasnevin area. Furthermore, the proposed Metro Link stop at Griffith Park is located c.350 metres from the appeal site. The site is also within walking distance to large employment centres. The applicant submitted a Transport and Traffic Statement in support of the application and this report provides full justification for zero car parking at this location.
- 6.1.8. In relation to the third reason for refusal which relates to the excessive height, scale and massing of the proposed development, this reason is challenged on the basis that the Board have granted planning permission for developments of a similar size and scale (the construction of 101 apartments granted by the Board under Reg. Ref. 308905 which relates to a five-storey development to the south). It is argued that this is of a similar height and scale and therefore sets an appropriate precedent for the development on the current site. Reference is made to the planning inspector's report justifying the height at this location.
- 6.1.9. In relation to the final reason for refusal reference is made to a separate report prepared by O'Neill Architecture which provides justification for the demolition of the structure. It notes that the structure is not considered to be of any significant merit as it has been altered to such an extent and it is no longer recognisable in terms of its original character. It is noted that the houses in question were excluded from the National Inventory of Architectural Heritage due to the poor survival rate of the original fabric. It is also noted that many of the 18<sup>th</sup> and 19<sup>th</sup> century houses have fallen into disrepair and that the village in question was largely rebuilt in the latter half

of the 20<sup>th</sup> century in a variety of styles which are not all in harmony. It is concluded that the Washerwoman Pub does not make a positive contribution to the hill but is in fact neutral and that the building is not significantly historical as alleged by the Planning Authority.

6.1.10. Reference is made to other planning precedent decisions with which it is argued is relevant and should inform the decision of the current application.

6.1.11. A number of appendices are attached including a photomontage production and a report by O'Neill Architecture which concludes that the building in question is not of interest in terms of historic, architectural, cultural or artistic criteria. It is not considered that the structure makes a positive contribution to the streetscape. While the building may have contributed to the streetscape in the past, the setting of the building and its original appearance has changed to the extent that its contribution can no longer be regarded as relevant. To refuse planning permission for a dense housing scheme on the basis that an unremarkable building should be preserved is not reasonable particularly in a city that has constantly replaced its building stock over many centuries.

## 7.0 **Appeal Responses**

7.1. Dublin City Council have not submitted a response to the grounds of appeal.

## 8.0 **Observations**

8.1. A total of four observations were submitted all of which support the decision of the Planning Authority. The main points in the observations are set out in grouped format below. The observations were submitted by:

- Glasnevin Village Residents Association
- David Goff
- Matt and Mary Robinson
- Eileen Keenan and Others

8.2. The following issues were raised.

- The size, scale and mass are inappropriate for Glasnevin Village. The building will dominate the streetscape. The design with jagged elevations is not sympathetic to the historic streetscape.
- The application site includes part of the public path which does not form part of the developer's ownership of the site. The applicant has not demonstrated sufficient legal interest in the public footpath to carry out the development.
- The proposal fails to properly integrate with the grant of planning permission issued on the adjacent site for the apartment development granted by An Bord Pleanála under Reg. Ref. 308905.
- The development fails to successfully integrate with the historic and sensitive environment and will adversely impact on the heritage of Glasnevin Village.
- There are still a number of historic buildings in the immediate area including protected structures which significantly contribute to the character of the area.
- The building in question used to accommodate a blacksmith and the structure dates from the 1700s. It is the oldest building left in the village. The decision to remove this building will profoundly impact on the fabric of the streetscape and protected structures in the area particularly with the removal of the existing building and archway. It is noted that the Conservation Officer of Dublin City Council recommended a refusal for the proposal.
- The buildings to be demolished reflect the rural vernacular origins of the village and present rare and unusual structures in this suburban area. The buildings therefore made a positive contribution to the setting and historic character of the area.
- No adequate parking or loading bays are provided for either the restaurant or the apartments which will give rise to parking overspill in the area. Furthermore, there has been no assessment of existing public transport capacity in the area.
- The proposal will give rise to excessive overlooking and overshadowing of adjoining properties.
- The proposal will take away much needed social infrastructure in the area including a creche and a pizza parlour. Adding additional housing without

commensurate social infrastructure will put further pressure on limited resources in the area.

- There is a need for an invasive species plan as Japanese Knotweed has been detected on the site.
- No reference to the provision of social and affordable housing is made in the scheme.
- There is no reference to public amenities in the area to serve the development.

### 8.3. **Natural Heritage Designations**

8.3.1. The subject site is not located within or contiguous to a Natura 2000 site. The nearest Natura 2000 site at its closest point the South Dublin Bay and River Tolka Estuary SPA (Site Code: 004024) is located 3.5 kilometres to the south-east of the subject site.

### 8.4. **EIAR Screening Assessment**

8.4.1. On the issue of environmental assessment screening, I note that the relevant classes for consideration are Class 10(b)(i) “the construction of more than 500 dwelling units” and Class 10(b)(iv) “urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built up area and 20 hectares elsewhere”.

8.4.2. Having regard to the modest size of the site at 0.055 hectares and the number of units to be provided at 18 (reduced to 16 by way of revised drawings) submitted to the Board on appeal which is considerably below the 500 dwelling threshold, it is considered that, having regard to the nature and scale of the proposed development, the location of the development on an urban brownfield site together with the characteristics and likely duration of potential impacts, that the proposal is not likely to have significant effects on the environment and the submission of an environmental impact assessment report is not required. The need for an environmental impact assessment can therefore be excluded by way of preliminary examination.

## 9.0 Planning Policy Context

### 9.1. National Planning Framework

- 9.1.1. One of the key overarching goals set out in the National Planning Framework is to achieve compact growth. This is sought by carefully managing the sustainable growth of compact cities, towns and villages. It is noted that the physical format of urban development in Ireland is one of the greatest national development challenges. Presently the fastest growing areas are the edges and outside our cities and towns meaning:
- 9.1.2. A constant process of infrastructure and services catch up in building new roads, new schools, services and amenities and a struggle to bring jobs and homes together meaning that there were remarkably high levels of car dependents and that it is difficult to provide good quality transport.
- 9.1.3. A preferred approach would be the compact development that focuses on reusing previously developed brownfield land building up infill sites which may not have been built on before and reusing and redeveloping existing sites and buildings. National Policy Objective 3B seeks to deliver at least half of all new homes that are targeted in the five cities and suburbs of Dublin, Cork, Limerick and Galway within their existing built-up footprints. National Policy Objective 13 seeks that in urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes provided public safety is not compromised and the environment is suitably protected.
- 9.1.4. National Policy Objective 35 seeks to increase residential density in settlements, to a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

### 9.2. Rebuilding Ireland Action Plan for Housing and Homelessness

- 9.2.1. Pillar 3 of this national strategy seeks to build more homes by increasing the output of private housing to meet demand at affordable prices. In terms of housing supply



requirements, it is noted that current completion levels must double in the next four years. It is also noted that there is a significant requirement to expand the build to rent sector which is not being catered for in the current construction levels. There is also a need to increase the level of social housing. The Rebuilding Ireland Policy emphasises the need to supply and build more homes with delivery of housing across the four Dublin Local Authorities.

### 9.3. **Sustainable Urban Housing Design Standards for New Apartments**

9.3.1. These guidelines note that in the short term to 2020 the Housing Agency has identified a need for at least 45,000 new homes in Ireland's five major cities more than 30,000 of which are required in Dublin City and suburbs. This does not include the additional pent-up demand arising from undersupply of new housing in recent years. In broader terms there is a need for an absolute minimum of 275,000 new homes in Ireland's cities up to 2040 with half of these located within built up areas. This necessitates a significant and sustained increase in housing output and apartment type development in particular. Specifically, there is a need:

- To enable a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas.
- Make better provision for building refurbishment and small-scale urban infill schemes.
- Address the emerging build to rent and shared accommodation sectors.
- Remove requirements for car parking in certain circumstances where there are better mobility solutions to reduce costs.

9.3.2. In terms of identifying the types of locations within cities that may be suitable for apartment development the guidelines note the following:

9.3.3. In central and/or accessible urban locations such locations are generally suitable for small to large scale higher density development that may wholly comprise of apartments. These include

- sites within walking distance of the principal city centres or significant employment locations that may include hospitals and third level institutions,

- sites within reasonable walking distance (i.e. up to 10 minutes or 800 metres to 1,000 metres) to or from high capacity urban public transport stops such as Dart or Luas, and
- sites within easy walking distance i.e. up to five minutes to and from high frequency urban bus services.

#### **9.4. Urban Development and Building Heights - Guidelines for Planning Authorities**

- 9.4.1. These Guidelines again highlight the need for a development plan to place more focus in terms of planning policy and implementation on reusing previously developed brownfield land building up urban infill sites. It notes that increasing building height is a significant component in making the optimum use of the capacity of sites in urban locations where transport, employment, services and retail development can achieve a requisite level of intensity for sustainability. Accordingly, the development plan must include the positive disposition towards appropriate assessment criteria that will enable the proper consideration of development proposals for increased building height linked with the achievement of greater density of development.
- 9.4.2. It is acknowledged that taller buildings will bring much needed additional housing and economic development to well-located urban areas and that they can also assist in reinforcing and contributing to a sense of place within the city or town centre.
- 9.4.3. The Guidelines note that statutory development plans have tended to be overtly restrictive in terms of maximum building heights in certain locations and crucially without the proper consideration of the wider planning potential of development sites. Such displacement presents a lost opportunity in key urban areas of high demand for new accommodation whether it is for living, working, leisure or other requirements in the built environment.
- 9.4.4. Planning policy must therefore become more proactive and more flexible in securing compact urban growth through a combination of facilitating increased densities and building heights while also being mindful of the quality of development and balancing amenity and environmental considerations. Appropriate identification and siting of areas suitable for increased densities and height will need to consider environmental sensitivities of the receiving environment as appropriate throughout the planning hierarchy.

- 9.4.5. Paragraph 2.8 notes that historic environments can be sensitive to largescale tall buildings. In that context Planning Authorities must determine if increased height buildings are appropriate in these particular settings.
- 9.4.6. Taking into account the foregoing, the specific planning policy requirement of the above guidelines under SPPR1 is
- In accordance with government policy to support increased building height and density in locations with good public transport accessibility, particularly town/city cores, Planning Authorities shall explicitly identify through the statutory plans, areas where increased building heights will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.
- 9.4.7. Special planning policy requirement SPPR2 states that in driving general increases in building heights, Planning Authorities shall also ensure appropriate mixtures of uses, such as housing, commercial and employment development, are provided for in the statutory plan context.
- 9.5. **Development Plan Provision**
- 9.5.1. The site is governed by the policies and provisions contained in the Dublin City Development Plan 2016-2022. The subject site is zoned Z3. “*to provide for and improve neighbourhood facilities*”. Both restaurant use and residential use are permissible under this land use zoning objective.
- 9.5.2. The subject site is also located within a Zone of Archaeological Constraint and between two sites of archaeological interest - 018.004 to the west on the grounds of the adjoining Convent and 018.005 lands to the east of Glasnevin Hill and to the north of St. Mobhi Drive.
- 9.5.3. There are no protected structures on the subject site. The adjoining Convent building is a protected structure and a building on the opposite side of the road on the corner of Beechmount and Glasnevin Hill c.70 metres from the subject site is also a protected structure.
- 9.5.4. Chapter 5 of the development plan relates to Quality Housing.

- 9.5.5. Policy QH5 seeks to promote residential development addressing any shortfall in housing provision through active land management and co-ordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites and underutilised sites.
- 9.5.6. Policy QH6 seeks to encourage and foster the creation of attractive mixed use, sustainable neighbourhoods which contain a variety of housing types tenures with supporting community facilities, public realm and residential amenities which are socially mixed in order to achieve a socially inclusive city.
- 9.5.7. Policy QH7 seeks to promote residential development at sustainable urban densities throughout the city in accordance with the core strategy having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.
- 9.5.8. Policy QH8 seeks to promote the sustainable development of vacant or underutilised infill sites and to favourably consider higher density proposals which respect the design of the surrounding development and character of the area.
- 9.5.9. Policy QH18 seeks to promote the provision of high-quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and with each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood, in accordance with standards for residential accommodation.
- 9.5.10. Policy QH19 seeks to promote the optimum quality and supply of apartments for a range of needs and aspirations, including households with children, in attractive sustainable mixed income, mixed use neighbourhoods supported by appropriate social and other infrastructure.
- 9.5.11. Section 16.7 relates to building height in a sustainable city. Dublin City Council acknowledges the intrinsic quality of Dublin as a low-rise city and its policy is that it should predominantly remain so. There was a recognised need to protect conservation areas and the architectural character of existing buildings, streets and spaces of artistic civic or historic importance. In particular, any new proposal must be sensitive to the historic city centre, the River Liffey and Quays, Trinity College, Dublin Castle, the historic squares and the canals.

- 9.5.12. It is important to protect and enhance the skyline of the inner city and to ensure that any proposals for high buildings make a positive contribution to the urban character of the city and create opportunities for place making and identity. In the case of low-rise areas (which the subject site is located) a maximum height of 28 metres may be permissible.
- 9.5.13. In terms of aspect natural lighting and sunlight penetration the development plan notes that daylight animates the interior and makes it attractive and interesting as well as providing light to work or read by. Good daylight and sunlight contribute to making a building energy efficient, it reduces the need for electronic lighting while winter solar gain and reduce heating requirements.
- 9.5.14. The indicative plot ratio for Z1 zonings in the inner city is 0.5 to 2.0 and the indicative site coverage for sites governed by the Z1 zoning objective is 45 to 60%.

## 10.0 Planning Assessment

I have read the entire contents of the file, visited the subject site and its surroundings, have had particular regard to the Planning Authority's reasons for refusal and the applicant's rebuttal of these reasons. I have also had regard to the issues raised in the observations contained on file. I consider the following issues to be pertinent in the deliberation and determination of the planning application and appeal.

- Principle of Development
- Residential Amenity for Future Occupants
- Parking Issues
- Impact on Surrounding Residential Amenity
- Height, Bulk and Scale of the Proposed Development
- Impact on Character of the Area
- Impact on Social Infrastructure

## 10.1 Principle of Development

- 10.1.1. The fundamental consideration in adjudicating on the current application relates to national policy in relation to housing delivery and the zoning provision pertaining to the site. While the site is governed by the zoning objective Z3 “to provide for and improve neighbourhood facilities” I note that both restaurant use and residential use is permitted in principle. The nature of the proposed mixed-use development to provide a restaurant at ground floor level and residential units overhead is wholly compatible with the zoning provisions relating to the site. Furthermore, there are numerous national planning guidelines which have been adopted in recent years which emphasise the need to maximise the development potential of sites particularly in relation to housing development given the current housing crisis which exists within the State. A major thrust of the National Planning Framework seeks the preferred approach to create more compact urban settlements that focus on reusing previously developed brownfield land and infill sites within existing built-up areas. The development plan reinforces this strategy through Policy QH8 which seeks to promote the sustainable development of vacant and underutilised infill sites and favourably consider higher density proposals which respect the design of the surrounding development and character of the area. The National Planning Framework seeks to encourage more people jobs and activity within the footprint of existing urban areas so that high quality development can encourage more people to work and live in close proximity. The plan seeks to deliver that at least half of new homes can be located within the five main cities of the State and in particular Dublin. The land use strategy concludes that *“it is clear that we need to build inwards and upwards rather than outwards. This means that apartments would need to become the more prevalent form of housing particularly in Ireland’s cities”*. National Policy 35 seeks to increase residential density in settlements, to a range of measures including reductions in vacancy, the reuse of existing buildings, infill development schemes and site based regeneration including increased building heights.
- 10.1.2. The Apartment Guidelines also highlight the need to provide higher density development in central or accessible urban locations and to identify the need to provide more than 30,000 units within Dublin and its suburbs. The need to provide more housing units is also reflected in the Rebuilding Ireland Action Plan and the most recently adopted National Housing Strategy entitled “Housing for All”. These

plans all highlight the need for Planning Authorities to become more proactive and more flexible in securing compact urban growth through a combination of facilitating increased densities and building heights subject to the need to be cognisant of any surrounding sensitive environments be them environmental or historic.

10.1.3. On the basis of the above I consider the principle of higher density development on the subject site, notwithstanding the fact that it departs from the prevailing density along this section of Glasnevin Hill, is nonetheless appropriate from a strategic land use point of view. Strategic considerations set out in the various documentation referred to above dictate that the provision of a higher quantum of development is necessary and appropriate on the subject site. Furthermore, the Board in granting planning permission for a five-storey development containing 101 apartments under Reg. Ref. ABP308905 suggests that the Board accept that a high quantum of development in line with strategic land use policy is acceptable on the subject site.

10.1.4. It is acknowledged however that any wider strategic considerations must be balanced against a qualitative analysis of the proposal in terms of the development's ability to provide an adequate level of amenity for future occupants and to ensure that the proposal does not have an unacceptable impact on surrounding amenity. These issues are assessed in more detail below.

## 10.2. Residential Amenity for Future Occupants

10.2.1. The issue of residential amenity for future occupants essentially forms the basis for the first reason for refusal cited by Dublin City Council in its decision. The Council argue that the proposal would not provide an appropriate level of residential amenity for future residents due to the poor quality of the north facing private open space and the number of bedrooms facing blank walls at short distances and the lack of any communal open space.

10.2.2. In terms of unit mix, I note that there is a good unit mix proposed in this instance with a mixture of 1, 2, 3 and 4 bedroomed units proposed on the subject site (as per the revised drawings submitted to An Bord Pleanála). Furthermore, the number of one-bedroomed units at four is compliant with Specific Planning Policy Requirement 1 (SPPR1) of the Sustainable Urban Housing Design Guidelines for New Apartments.

10.2.3. In terms of floor area, a breakdown of each of the units are indicated on the drawings submitted. It is clear that most of the units, and particular the one-bedroomed units

comfortably exceed the minimum apartment floor areas required under the Guidelines. A number of two-bedroomed apartments at 64 square metres marginally exceed the minimum guidelines and may be only suitable for three person occupancy.

- 10.2.4. The floor to ceiling heights at just over 3 metres are generous and exceed the minimum requirements set out in the Apartment Guidelines.
- 10.2.5. I would however express some concerns in relation to the overall layout, orientation and aspect of the units proposed. Many of the units proposed are essentially north facing single aspect units and this in my view is problematic from an amenity perspective for future occupants. The Board will note that Units Nos. 5 and 6 and 9 and 10 are for all intents and purposes north facing single aspect units. While the above apartments do incorporate some windows to the south of the units these windows overlook small lightwell areas between the units on the eastern elevation and a small void area above the estate agent unit near the western elevation. Furthermore, windows between the units serving habitable rooms directly overlook each other with minimum separation distance. For example, the separation distance between Bedroom No. 1 in Apartment 5 and Bedroom No. 1 in Apartment 7 is a mere 4.5 metres. A similar separation distance is provided between bedroom windows in the case of Apartment No. 9 and Apartment No. 11. This in my view provides an unacceptable level of amenity for future occupants. The south facing bedrooms (Bedroom No. 2) in the case of Apartment No. 6 and Apartment No. 10 face directly onto a blank wall c.2.5 metres away. Again, this offers a poor level of amenity for future occupiers.
- 10.2.6. It is also clear from the average daylight factor analysis, that some of the bedrooms particularly the north facing bedrooms of the residential units located in the south-western corner of the block, either do not achieve the minimum average daylight factor and only marginally achieve the minimum standard. It is also clear from the analysis undertaken and submitted with the application; that while the south facing balconies achieve appropriate levels of amenity in terms of sunlight penetration, the north facing balconies fail to achieve the BRE requirements.
- 10.2.7. Arising from my assessment above therefore I would concur with the conclusions of the Planning Authority that the layout and design of the apartments as proposed



result in a level of amenity for future occupants to be substandard particularly in relation to daylight and sunlight penetration and the proximity of windows serving habitable rooms which will give rise to a significant degree of overlooking.

10.2.8. In terms of communal open space, I consider that the size and layout of the site does not lend itself to provide any meaningful or usable communal open space as part of the layout. The relatively modest number of apartments proposed at 18 (reduced to 16 by way of revised drawings submitted within the appeal) would allow me to conclude that the shortfall in open space provision could be adequately dealt with by a financial contribution in lieu of communal open space provision. I note that a condition to this effect was incorporated into the adjoining scheme granted by the Board under ABP308905-20 (See condition no. 29 of the Boards Order).

### 10.3. **Parking Issues**

10.3.1. This issue was also a significant concern of Dublin City Council in adjudicating on the application. I note the report from the Transport Planning Division which has concerns regarding the provision of zero parking. The large number of observations submitted to the Planning Authority and the observations submitted to the Board also express some concerns in relation to parking. I note that there is partial parking restriction on the streets surrounding the site. However, uncontrolled on-street parking is permitted on some of the residential streets in the wider area.

10.3.2. The subject site is located in Parking Area 3 which permits a maximum of 1.5 spaces per residential unit and 1 car parking space per 150 square metres of seating area in respect of restaurants. While it is acknowledged in the Apartment Guidelines allow for zero car parking in central locations such as areas in or adjoining city cores or in the confluence of public transport systems such as rail and bus stations which are located in close proximity. The subject site is not located in the city core. In fact it is located in the most peripheral area in terms of the application of car parking standards of the city. While two bus routes serve the Glasnevin Hill area (Dublin Bus route 83 and 83A) these are the only bus routes that pass by the site. It is acknowledged that they have a relatively frequent service ranging from 10 to 20 minutes. The site is not located at a public transportation hub that would in my view justify the provision of zero car parking on the subject site. I note that in the case of the adjoining development granted by the Board under ABP308905-20, a parking

ratio of 0.4 car parking spaces was provided per apartment unit. A similar ratio of car parking should be provided in the case of the current application. Reliance on future infrastructural projects which in the case of Metrolink<sup>1</sup> is unlikely to be delivered in the short-term is not in my view an appropriate justification to provide zero car parking on the site in question.

10.3.3. The provision of zero car parking in my view would exacerbate and accentuate existing problems of overspill parking occurring on the residential streets surrounding the subject site. I do not consider that the applicant has made a well-founded or well-justified case for the provision of zero car parking on the subject site having regard to the site's peripheral location from the city centre and the lack of high quality public transport available to the future occupants of the site.

#### 10.4. **Impact on Surrounding Residential Amenity**

10.4.1. In relation to impact on surrounding amenity, I am generally satisfied that the proposed development will not give rise to any significant levels of overlooking or overshadowing of adjoining properties. The subject site, being located in an urban area, and being six storeys in height will obviously result in increased levels of overshadowing. However, this is an inevitable consequence of providing taller buildings at more sustainable densities within urban areas. I note that shadowing casting diagrams were not submitted with the planning application. However, a detailed analysis was undertaken of the impact of the proposed development on the light from the sky impact on neighbouring properties in the vicinity of the site. The critical properties potentially affected in terms of light from the sky impact are those properties located directly to the north-east of the site facing onto Glasnevin Hill. The analysis undertaken indicates that the south facing windows of these properties would all pass the vertical sky component tests for skylight to habitable rooms with none of the windows achieving a reduction in skylight of less than 80% of its former values. On the basis of the above I am satisfied that the proposed development will not have a significant or material impact on the amount of skylight received to habitable rooms in the vicinity of the subject site.

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<sup>1</sup> The Board will note that a recent Government Decision has pushed this project out until at least 2031.

## 10.5. Height, Bulk and Scale of the Proposed Development

- 10.5.1. What is proposed under the current application is a six-storey residential development fronting onto Glasnevin Hill. The fact that the subject site is located on the approach to the summit of the hill accentuates the overall size and scale of the building particularly when compared with the five-storey development granted planning permission under ABP308905 to the south-east. (For comparison I refer the Board to Drawing No. 2001-(03)-104 submitted as part of the original application).
- 10.5.2. There are a number of buildings in the vicinity which are larger than the characteristic two-storey development which prevails in the wider area. These include the larger three and four storey late 19<sup>th</sup> century redbrick institutional buildings to the west of the site, the rather large and bulky four storey Met Eireann building almost opposite the site and the DCU Innovation Campus located further west along the Glasnevin Road. There is therefore precedent for larger buildings in the area. There is therefore more variety in building heights in the vicinity of the subject site which would in aesthetic terms justify a building of a larger and higher scale than that which currently exists on site.
- 10.5.3. Furthermore, it is not reasonable in my view that there would be no material change in the overall size, scale and bulk of any redevelopment of the subject site having regard to National Guidelines which seeks to ensure the delivery of a higher quantity of housing in the form of apartments on urban sites which are located in close proximity to centres of employment and can avail of existing physical infrastructure and services.
- 10.5.4. SPPR1 of Government Guidelines and Building Heights seek to support increased building height and density at locations with good accessibility in existing cities and towns. The guidelines point out that, in assessing individual planning applications and appeals, it is Government policy that building heights must generally be increased in appropriate urban locations as this positively assists in security National Planning Framework Objectives.
- 10.5.5. On this basis I would consider it reasonable that a building of the height and scale proposed at 22.5 metres is acceptable in this instance. I have also argued above that the proposed development will have a limited impact on surrounding development in

terms of overshadowing etc. On the basis of the above I do not consider that planning permission should be refused solely on the basis that the building in question constitutes a structure of excessive height, mass and scale.

## **10.6. Impact on Character of the Area**

- 10.6.1. Significant concerns have been raised that the proposed development involves the demolition of an existing historic building on the subject site possibly dating from the early 1700s which was originally used as a blacksmith's forge. The existing stone building on site, notwithstanding the modifications which have taken place at ground floor level to the front of the building to include the pizzeria and the estate agents, is nonetheless an aesthetically pleasing building which does reflect the older remnants of the village prior to significant suburbanisation on the late 19<sup>th</sup> and early 20<sup>th</sup> century onwards.
- 10.6.2. A report prepared by O'Neill Architects Limited suggests that the building is of little historical, architectural or cultural integrity or importance. It is also argued that the existing structure on site has been the subject of extensive renovations and there are virtually no internal features of historic interest. The restaurant was not open at the time of my site inspection, so I was not able to inspect the interior. I rely on the photographs attached to the report submitted of the interior. The conclusions reached in the report prepared by O'Neill Architects is somewhat difficult to reconcile with the information contained in the Conservation Officer's report. It suggests that the building's historic form and massing positively contributes to the streetscape and character of the wider area. It argues that the applicant was requested to submit further information in relation to the historic heritage associated with the building by way of the pre-application consultation. This was not adhered to, although I do note that an assessment of the building was undertaken and submitted by way of the grounds of appeal. If the Conservation Officer's report argues that cartographic sources indicate that the subject building is one of the early surviving buildings within the historic village of Glasnevin and in this regard the demolition of the building would be entirely inappropriate from an architectural conservation standpoint.
- 10.6.3. The above conclusions are somewhat at odds with the fact that the building in question is not listed as a protected structure in the development plan nor is it included in the National Inventory of Architectural Heritage. This would suggest that

notwithstanding the comments of the Conservation Officer, that the building in question may not meet criteria which would warrant its preservation.

10.6.4. There can be no doubt that the building in question does positively contribute to the historic character of Glasnevin Hill and the original stone structure on site contributes to the visual amenities of the area. It would in my view be a positive planning gain to retain or incorporate the building into any redevelopment proposal associated with the site. On the other hand it is hard to justify its retention in the absence of any specific designation particularly when there is a significant and urgent need to redevelop brownfield sites at more sustainable densities to address the current housing crisis. It is in my view, difficult to be definitive on whether or not the building should be retained. On the basis of the latter argument to provide much needed housing, the Board might come to the conclusion that the demolition of the building in the absence of any preservation designations could be justified.

#### **10.7. Impact on Social Infrastructure**

10.7.1. A number of observations submitted argued that the proposed development will result in the removal of a pizzeria and more importantly a much needed creche facility within Glasnevin. The removal of such services needs to be balanced against the need to provide new housing units within the city at appropriate densities. While the proposed development will result in the removal of a creche facility, such a facility could be provided at alternative locations within Glasnevin to satisfy demand should it arise. It would in my view be both inappropriate and disproportionate to refuse planning permission for much needed houses purely on the basis that the grant of planning permission would result in the relocation of a creche and pizzeria off-site to elsewhere in the vicinity.

#### **11.0 Conclusions and Recommendation**

Arising from my assessment above therefore, and notwithstanding the need to provide additional residential units within the city, I would have significant concerns that the proposed development would constitute a substandard form of development for future occupants of the scheme due to the incorporation of predominantly north facing single aspect units and the fact that significant overlooking between habitable rooms could occur within the apartment layout proposed. I am also concerned that

the provision of zero car parking on a suburban site peripheral to the city centre would give rise to haphazard and overspill parking in the surrounding area and would therefore be contrary to the proper planning and sustainable development of the area.

## **12.0 Appropriate Assessment**

The nearest Natura 2000 sites in the subject site are:

South Dublin Bay and River Tolka Estuary SPA (Site Code: 004024) located 3.2 kilometres from the subject site. The South Dublin Bay SAC (Site Code: 000210) is located approximately 5.7 kilometres from the subject site while the North Dublin Bay SAC (Site Code: 000206) and the North Bull Island SPA (Site Code: 004006) are both located approximately 6 kilometres from the subject site.

In determining the Natura 2000 sites to be considered, I have had regard to the nature and scale of the development, the distance from the site to the designated Natura 2000 sites and any potential pathways which may exist from the development site to the Natura 2000 sites. The site is not directly connected with, or necessary for the management of two Natura 2000 sites. The zone of influence of the proposed project would be limited to the confines of the site during the construction phase with minor localised noise and light impacts occurring during the construction phase which would be short-term and temporary. Drainage from the site in terms of foul and surface water would be a direct emission during the construction and operational phase. However, there is no direct hydrological connection between the subject site and the Natura 2000 sites referred to. All foul water discharge during the operational phase would be directed to the Ringsend Wastewater Treatment Plant. The recent upgrade of this plant has been the subject of a planning application and an appropriate assessment and the operation of this wastewater treatment plant was deemed to be acceptable in terms of its potential impact on surrounding Natura 2000 sites including both the North Dublin Bay SAC and South Dublin Bay SACs and the South Dublin Bay and River Tolka Estuary SPA. The scale and nature of the proposed development is unlikely to put any significant increased demand on wastewater treatment provision at Ringsend.

In terms of in combination effects in note that the proposed project is taking place in the context of other significant development and regeneration projects throughout the city which will in turn result in increased volumes to the Ringsend Wastewater Treatment Plant. However, it is noted that upgrade works have commenced on the Ringsend Wastewater Treatment Plant as permitted in accordance with development consents and the facility will be subject to EPA licensing and has been the subject of appropriate assessment. The upgrade of the wastewater treatment plant will enable increased volumes of wastewater to be adequately treated to the required standard to ensure that it complies with the requirements of the Habitats Directive and the Urban Wastewater Treatment Directive.

On the basis of the above it is reasonable to conclude that the proposed development, individually or in combination with other plans and projects would not be likely to have a significant effect on the South Dublin Bay SAC (Site Code: 000210), the North Dublin Bay SAC (Site Code: 000206), the South Dublin Bay and River Tolka Estuary SPA (Site Code: 004024) and the North Bull Island SPA (Site Code: 004006), or any other European site in view of these site's conservation objectives and having regard to the nature and scale of the proposed development, and the location of the site within an established serviced urban area and the separation distance to the nearest European site, no appropriate assessment issues arise. It is therefore not considered that the proposed development would be likely to give rise to significant effects individually or in combination with others plans or projects on a European site. Therefore, there is no requirement for a Stage 2 Appropriate Assessment and the submission of an NIS.

### 13.0 **Decision**

Refuse planning permission for the proposed development based on the reasons and considerations set out below.

## 14.0 Reasons and Considerations

1. It is considered that the proposed mixed-use development would provide a substandard form of residential accommodation for future residents due to the poor quality north facing apartments which essentially comprise of single aspect units together with the provision of substandard separation distances between bedrooms within the scheme and a number of bedrooms facing blank walls in close proximity. It is therefore considered that the proposed development would constitute a substandard form of residential development for future occupants and would therefore be contrary to the proper planning and sustainable development of the area.
2. It is considered that the proposed development in providing no car parking provision for either the residential units or the restaurant would accentuate and exacerbate overspill car parking on surrounding residential areas which would adversely impact on surrounding residential amenity and would give rise to haphazard parking which would result in a traffic hazard. The proposed development would therefore be contrary to the proper planning and sustainable development of the area.

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Paul Caprani,  
Senior Planning Inspector.

8th December, 2021.