



An
Bord
Pleanála

Addendum

Inspector's Report

ABP-313553-22

Development	The proposed development will consist of: (i) demolition of dwelling and steel shed to the rear and (ii) construction of 2 separate apartment blocks yielding a total of 27 apartments together with all associated site works and services.
Location	No. 17 Richmond Avenue, Fairview, Dublin 3 and No. 19 Richmond Avenue, Fairview, Dublin 3.
Planning Authority	Dublin City Council.
Planning Authority Reg. Ref.	3657/21.
Applicant(s)	Vesada Private Limited.
Type of Application	Planning Permission.
Planning Authority Decision	Grant with conditions.
Type of Appeal	Third Party
Appellant(s)	1. Anne Marie Farren & Others. 2. John Griffin.
Observer(s)	None.

Date of Site Inspection

18th day of July, 2023.

29th day of February, 2024.

Inspector

Patricia-Marie Young.

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1.0 Introduction

- 1.1. This is an Addendum Report for appeal case ABP-313553-22 prepared following the Board Direction dated 20th day of October, 2023, to the applicant seeking further information (FI) under Section 132 of the Planning and Development Act, 2000, as amended (2000 Act). In this regard, the Board sought the following FI:

“The proposed development site is zoned under the Dublin City Development Plan, 2022-2028 to consolidate and facilitate the development of inner city and inner suburban sites for mixed uses with residential being one of the primary land uses permitted. The Development Plan does not advocate mono-use developments in this zone and seeks to create sustainable residential communities which contain a variety of housing and apartment types, sizes and tenures, in accordance with the Housing Strategy and Housing Need and Demand Assessment (HNDA).

Having regard to Policy QHSN38 regarding housing and apartment mix and based on a sub-city level HNDA for the North Inner City, Section 15.9.1 of the Development Plan requires that developments of the nature proposed contain a minimum of 15% three or more bedrooms and a maximum of 25-30% one-bedroom/studio units. This provision accords with the SPPR 1 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities’, 2020, as amended.

The Board notes that the unit mix provision of the Dublin City Development Plan, 2022-2028 that came into effect on the 14th day of December 2022 differ materially from those of the preceding Development Plan which was applicable at the time of application and when the applicant lodged this appeal with the Board on the 11th day of May 2022.

In the interests of natural justice, the applicant is invited to provide further information or details regarding this issue to the Board for its further consideration should they so wish.”

- 1.2. The Board allowed the applicant 4 weeks to respond and all Parties to this appeal case were notified of the Boards FI request.
- 1.3. The applicant submitted their FI response to the Board on the 28th day of November, 2023, and this response was circulated to the Appellant and the Planning Authority for their response under Section 131 of the 2000 Act.

- 1.4. The purpose of this Addendum Report is to consider the applicants FI response as well as the further submissions received from the Appellant and the Planning Authority in relation to the same.
- 1.5. This Addendum Report should be read in conjunction with my original Inspectors Report, dated the 7th day of September, 2023, which is attached to this file. This report outlines all other relevant information and matters relating to the proposed development.
- 1.6. It also includes AA as well as EIA screening determinations as part of the assessment of the proposed development.
- 1.7. I also note to the Board that I conducted a further inspection of the site on the 29th day of February, 2024. I note that the single storey side extensions of No. 19 Richmond Avenue and the boundary wall between it and the adjoining property to the south had been demolished. To the front of No. 19 Richmond Avenue there were two refuse bins, and the building had the appearance of it being in use. I additionally observed that the portion of the subject site that relates to No. 17 Richmond Avenue was in use for access and storage of associated construction materials as well as vehicles in relation to the on-going construction works on the adjoining site to the south (Note: No. 15 Richmond Avenue). In relation to the contended excavation works these appear to relate to the adjoining site of No. 15 Richmond Avenue. Richmond Avenue itself was congested with vehicles parked, many of which were related to the on-going construction activities at No. 15 Richmond Avenue.

2.0 Applicants Response

- 2.1. As set out above the Applicants FI response was received on the 28th day of November, 2023. It consists of:
 - Written Response
 - Revised Floor Plan Drawings for Block 1 and Block 2.
- 2.2. Their written response can be summarised as follows:
 - The revised architectural drawings provide a café at ground floor level in replacement of 1 no. apartment in Block 1 fronting onto Richmond Avenue. Notwithstanding, it is considered that the mono-use scheme as originally sought is

preferable having regard to the established residential setting within which the development is proposed.

- The configuration of the site is constrained with limited site frontage. This would affect whether a café or any commercial development would be viable at this location and such uses would add to pressure on the road network in turn negatively impacting upon existing and future residential development.
- The site is located within 260m from a Circle K on Richmond Road and within 500m there is a pharmacy, Credit Union, and drapery shop. Additionally, it is in proximity to a number of other facilities and services including a medical facility, solicitors office, café, post office and a spar convenience store. These are all within walking distance.
- The provision of a café would result in the loss of a dwelling unit.
- Should the Board consider it necessary to have regard to the Dublin City Development Plan, 2022-2028, they confirm that the proposed unit mix has been revised to accord with Policy QHSN38 and Section 15.9.1 of the said plan.
- Revising the unit mix alongside the revisions results in reduction to 16 no. apartment units (9 no. units in Block 1 and 7 no. units in Block 2) with the breakdown of apartments consisting of 5 no. 1 beds (31%); 8 no. 2 beds (50%) and 3 no. 3 beds (19%). This revised mix results in 1% over in relation to the number of 3-bedroom units and this is not considered to materially contravene the provisions of Policy QHSN38.
- Should the Board consider the revisions required under Condition No. 17 of the Planning Authority's notification to also be desirable a revised scheme is put forward that would result in 17 no. apartments (9 no. units in Block 1 and 8 no. units in Block 2) with the breakdown mix being 5 no. 1 beds (29%), 9 no. 2 beds (53%) and 3 no. 3 beds (17.5%).
- Both options are put forward to the Board for them to consider what is the most appropriate option.
- It is their preference that the Board approve the proposed scheme as originally submitted and determined by the Planning Authority.
- It is contended that they have agreed in principle the purchase of this scheme to an approved housing body should permission be successful. It is therefore requested that the Board consider this scheme as to be used as social housing.

- The Board is requested to permit the proposed development in the interest of providing much needed housing during the current housing crisis.

3.0 Further Responses

3.1. Third Party Appellant – John Griffin

3.1.1. A Section 131 submission was received by the Board from Third Party Appellant, John Griffin, on the 10th day of January, 2024, it includes the following comments:

- Concern is raised in relation to the adequacy of the revised drawings. Including the lack of revised elevational drawings, contextual drawings, and the like. It is also considered that the revised drawings are unclear in terms of indicating which blocks they relate to.
- Concerns are raised that currently the site has construction works underway and No. 17 as well as No. 19 Richmond Avenue have been demolished. Yet no permission has been granted.
- Boundary walls have been removed yet there is no detail on replacement walls on the drawings provided.
- Proximity of the café to No. 21 Richmond Avenue would benefit from maintaining the original setback of No. 19 Richmond Avenue.
- No details have been provided for the treatment of the pavement area around the proposed coffee shop.
- As no elevation drawings have been provided the details of the two roof gardens have not been provided.
- There are still residential amenity impact concerns arising from the revised design including overlooking and overshadowing.
- The proposed development should be refused, and a new application with a revised design and layout should be sought for this tight development site.

3.2. Planning Authority's Response

3.2.1. A response was received from the Planning Authority by the Board on the 19th day of December, 2023. It can be summarised as follows:

- They agree with the Applicant that given the site's location off the main Richmond Road and its limited site area that it would not be efficient or effectively used should a non-residential element be provided at ground floor. On this point it notes that sites within Z14 zoned area away from Richmond Road have previously experienced vacancy due to the unattractiveness of this location for uses other than residential.
- The Z14 zoning should be interpreted in the broad sense of encouraging a multiple of uses across the area and smaller off-main street sites are best utilised for residential only schemes. In this regard, reference made to ABP-317136-23 (P.A. Ref. No. LRD6006/23-S3) and ABP-310653-21.
- Non-residential uses would be more sustainably.
- There is an error in interpreting the Dublin City Development Plan's HNDA maps. In this regards it is considered that Richmond Road is Dublin 3 and has never been within the northeast inner city and it does not form part of SDRA 10 North-East Inner-City area. As such the unit mix for that sub area is not applicable to Richmond Avenue.
- The proposal as permitted by the Planning Authority is compliant with Section 15.9.1 of the current Development Plan and SPPR 1 and 2 of the Apartment Guidelines.

4.0 Planning History

4.1. Setting

- **ABP-317438-23 (P.A. Ref. No. LRD6009/23-S3)**

St. Vincent's Hospital, Richmond Road and Convent Avenue, Fairview, Dublin 3 (c29m to the north of the rear boundary of the site).

On the 11th day of October, 2023, the Board **granted** permission to a large scale residential development consisting of 9 no. residential buildings providing 811 apartments (494 no. standard designed apartments and 317 no. Build to Rent apartments), new hospital building, refurbishment and repurposing of existing buildings on site including Brooklawn (RPS Ref.: 8789), Richmond House, including chapel and outbuildings (RPS Ref.: 8788) and ancillary work. Of note the residential blocks ranged in height from two storey to thirteen storeys.

- **ABP-317136-23 (P.A. Ref. No. LRD6006/23-S3)**

Former Leyden's Wholesalers & Distributors, no.158a Richmond Road, Dublin 3 (c188m to the northwest of the site).

On the 31st day of August, 2023, the Board granted permission to a large-scale residential development consisting of the demolition of buildings and construct 133 apartments, 17 artists' studios, a retail unit, a gymnasium, and a childcare facility in three blocks of four to ten storeys and associated development.

5.0 Assessment

- 5.1.1. Having regard to the Section 132 Notice and subsequent submissions, this assessment I concur with the Planning Authority in that the provision of a café addressing Richmond Avenue given its remoteness from Richmond Road, the constrained nature of the site with its limited street frontage and given the predominant residential in nature of this road, albeit the character of emerging developments seeking more compact denser scale residential developments would not make best use of this subject site on what has historically been predominantly residential street.
- 5.1.2. In relation to the apartment unit mix the applicant contends that the end user of the apartment scheme sought under this application is an Approved Housing Body. I am cognisant that there is flexibility provided for under Section 15.9.1 of the Dublin City Development Plan, 2022-2028, in terms of unit mix for such an end user and having re-examined the maps in relation to the North East Inner City / Dublin 1 area and the said Plans sub area map relating to the Housing Need and Demand Assessment carried out for this area I consider that the site lies to the north of this sub city area as defined. I therefore acknowledge my error in considering that that the unit mix applicable to this site was that which related to the North East Inner City.
- 5.1.3. As such the requirement for 15% three or more bedroom apartment units and a maximum of 25%-30% one bedroom/studio units is not applicable in this case and when regard is had to this the unit mix as amended in the applicants further information response as submitted to the Planning Authority during its determination of this application I accept is both acceptable under the Dublin City Development Plan, 2022-2028, provisions, as well as SPPR 2 of the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities', as amended.
- 5.1.4. I note that the Housing Strategy as set out under Appendix 1 of the Development Plan sets out under Section 6.4.3.1 the Household Composition Analysis of the Dublin City

Council area as well as the sub areas of the Liberties and the North East Inner City (Dublin 1 and Dublin 8) for the period between 2006 to 2016.

- 5.1.5. I am cognisant that this analysis sought to understand the dynamics of change over time in this period and estimate how they may change into the future. In this regard the intercensal average has been used to determine a trended annual average change in household composition (Note: Table 28).
- 5.1.6. In relation to the Dublin City Council area, it identified a reduction in one and four person households at a relatively slow rate and five plus person households at a much higher rate.
- 5.1.7. It also identified two and three person households are on an upward trend with two person households increasing at the highest rate (0.23 percent per annum).
- 5.1.8. The proposed unit mix as revised consists of 15 two bed space dwelling units, 6 dwelling units with 3 bedspaces and two dwelling units with 4 bedspaces. This mix is reflective of household trends in Dublin city in general.
- 5.1.9. Additionally, Section 6.4.3.2 of the Development Plan sets out that at the end of the plan period there will an increase in apartment dwelling units with just over 40% of all dwelling units in DCC being apartments.
- 5.1.10. Section 6.5.1 of the Development Plan on the matter of sub-city residential mix states: *“based on the analysis in the interim HNDA and custom HNDA it is recommended that the development plan will require planning applications for residential schemes in the North Inner City and Liberties Sub-City areas to include a residential mix as per Table 37. SPPR1 is applicable to the remainder of the Dublin City Council administrative area.”* This is also stated in Section 15.9.1 of the Development Plan.
- 5.1.11. SPPR 1 states that: *“housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).”*
- 5.1.12. I also note that Section 15.9.1 of the Development Plan sets out that SPPR 2 of the said Guidelines provides some flexibility in terms of unit mix for building refurbishment

schemes on sites of any size, urban infill schemes on sites up to 0.25 ha, schemes up to 9 units and for schemes between 10 and 49 units.

- 5.1.13. It further states that the Planning Authority will assess each application having regard to SPPR 2 on a case-by-case basis.
- 5.1.14. The Planning Authority in relation to this application considers that the flexibility allowed for under SPPR 2 should be applied and against the provisions of SPPR 2 the unit mix is deemed to be acceptable for this site given also that the potential end user is an Approved Housing Body. I consider that this is reasonable in this case.
- 5.1.15. Given the above considerations and having regard to the pattern of development existing and permitted, the limited area of the site which includes limited road frontage onto a cul-de-sac road predominantly in residential use, on reconsideration I concur with the Planning Authority that the mono-use residential redevelopment of this site as set out in the applicants revised design on the 21st day of March, 2022, accords with the proper planning and sustainable development of the area. I therefore consider that the first reason and consideration set out in my report dated 7th day of September, 2023, for refusal is not warranted.
- 5.1.16. Notwithstanding, this conclusion my second reason and consideration for refusal has not been overcome by the Boards Section 132 request. On this point I reiterate my concerns particularly in relation to the height, scale, mass and volume of the five storey Block 2 which is positioned to the rear of the site in proximity to the residential cul-de-sac of Richmond Lodge, the adjoining Pete's Antiques site, the permitted three storey building to the rear of No. 15 to the south and its proximity also to No. 21 Richmond Avenue the adjoining site to the north. In this context the proposed Block 2 would as set out in my previous report give rise to serious visual and residential concerns alongside would have the potential to unduly impact the future redevelopment of Pete's Antiques site which subject to 'Z1' zoning objective under the current Development Plan.
- 5.1.17. Additionally, there is no permeability of Block 2 to the adjoining public domain of Richmond Lodge 'Z1' zoned land.
- 5.1.18. Further, I consider that the scheme as revised still does not meaningfully respond in visual and functional connection to this adjoining public realm with this scheme proposing to maintain the existing industrial in appearance, tall, solid existing boundary wall, and no permeability, in particular pedestrian access proposed.

5.1.19. In so doing I consider that this results in a poor-quality visual response to the adjoining streetscape scene and adds to the visual incongruity of the five storey Block 2 building as viewed from this transitional more sensitive to change zoned land.

5.1.20. Moreover, the maintenance of the existing boundary treatment would also impact on daylight and ventilation penetration to the lower-level units within Block 2 as well as the quality of the space in between. A space that is likely to be heavily overshadowed.

5.1.21. Conclusion

As I concluded in my original Inspector Report, I consider the demolition of the buildings on this site to be acceptable and that the proposed development is one that generally accords with the overarching strategic approach of local through to national planning policies, provisions and guidelines which seeks to reverse underutilised, derelict, serviced sites and to provide compact, denser and sustainable developments that includes taller buildings at highly accessible urban locations like this. Notwithstanding, whilst I consider that my first reason and consideration for refusal is not warranted, I am still of the view that my second reason and consideration for refusal is warranted on visual amenity, residential amenity through to potential to adversely impact the future development of adjoining lands. For these reasons I am not satisfied that it accords with the proper planning and sustainable development of the area.

Should the Board be minded to grant permission for the proposed development despite the second reason and consideration set out in my report I recommend that it considers addressing these concerns by way of appropriate worded conditions that seek to reduce the overall height, massing and scale of Block 2 so that it more appropriately responds to existing and permitted development to the rear of this Richmond Avenue site with the view of reducing the potential for adverse visual and residential amenity impacts. Alongside ensuring that this development does not compromise or is to the detriment future potential of the Pete's Antiques and the adjoining vacant site that includes No. 21 Richmond Avenue.

Additionally, I recommend that an improved treatment of the boundary with Richmond Lodge including the consideration of providing pedestrian permeability and a more qualitative boundary treatment that results in an improved streetscape response with this adjoining public domain is sought. Such conditions could achieve a development that overcome the concerns set out in my second reason and consideration for refusal

and in so doing result in a more site appropriate residential scheme that accorded with the proper planning and sustainable development of the area.

I have had regard to the submissions and responses received, including the two amended design options that the applicant has put forward and the recent planning permissions in the vicinity of the site included largescale residential development schemes recently determined by the Board.

I have carried out an inspection and I do note as a precaution to the Board that there has been an element of works carried out on the site mainly in the form of some demolition of structures. Should the Board be minded to grant permission it may as a precaution wish to seek revised public notices in this regard.

Finally in the interests of clarity for the Board, whilst I am of the view that the applicant's FI response to this Section 132 request had no material consequence on the screening determinations for appropriate assessment and environmental impact assessment, notwithstanding, I have attached updated EIA Screening and EIA Preliminary Examinations attached to this report below.

6.0 Other

- 6.1. In the preparation of this addendum report I have had regard to the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, 2024, set national planning policy and guidance in relation to the planning and development of urban and rural settlements. These guidelines focus on sustainable residential development and the creation of compact settlements and they replace the Sustainable Residential Developments in Urban Areas, Guidelines for Planning Authorities, 2009 (now revoked). This residential scheme as revised by the further information to the Planning Authority accords with the guidance set out in these guidelines including in terms of density through to it is consistent with the SPPR's that it contains and in turn the proper planning as well as sustainable development of the area.

7.0 Recommendation

- 7.1. I recommend that permission be refused for the second reason and consideration set out in my original report dated the 7th day of September, 2023. For clarity it reads:

8.0 Reasons and Considerations

The proposed five storey Block 2 which would be positioned in close proximity to the public and private domain of Richmond Lodge, a modest cul-de-sac residential development consisting of a 2-storey terrace group of dwelling units, situated to the west and south west. It would also be positioned in close proximity to No. 15 Richmond Avenue to the south where planning permission has recently been granted for a three storey residential block, it adjoins with no setback the boundary with No. 21 Richmond Avenue, with both No. 15 and 21 Richmond Avenue zoned 'Z10' under the Dublin City Development Plan, 2022-2028, and it would be positioned in close proximity to the Pete's Antiques site which is situated to the north west and is residentially zoned ('Z1') under the said Development Plan and therefore suitable for future residential redevelopment.

In this context when regard is had to the existing and permitted development Block 2 five storey height would constitute an abrupt visual transition in building scale.

It would also be visually incongruous and overbearing and would seriously injure the residential amenities of these properties.

The proposed development therefore be contrary to the 'Z1' zoning objective for the adjoining land to the west and south west which seeks to protect, provide, and improve residential amenities under the said Development Plan as well as would be contrary to Section 14.6 of the said Development Plans guidance for transitionally zoned land which seeks to avoid abrupt transitions in scale and seeks to avoid developments that would be detrimental to the amenities of the more environmentally sensitive zones.

Moreover, Block 2 at the height proposed alongside its proximity to multiple boundaries would constitute an excessive scale of backland development with no meaningful visual or functional connectivity with its setting including public realm of Richmond Lodge and it has the potential to unduly impact future development at the Pete's Antique site as well as No.s 15 and 21 Richmond Avenue.

It is therefore considered that this residential block would constitute an excessive scale of development that is incompatible with its surroundings that also has the potential to give rise to undue overshadowing of surrounding properties.

The proposed development would, therefore be, contrary to the proper planning and sustainable development of the area.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Patricia-Marie Young
Planning Inspector

21st day of March 2024

Appendix 1 - Form 1

EIA Pre-Screening

[EIAR not submitted]

An Bord Pleanála Case Reference	ABP-313553-22		
Proposed Development Summary	The proposed development will consist of: (i) demolition of dwelling and steel shed to the rear and (ii) construction of 2 separate apartment blocks yielding a total of 27 apartments together with all associated site works and services.		
Development Address	No. 17 Richmond Avenue, Fairview, Dublin 3 and No. 19 Richmond Avenue, Fairview, Dublin 3.		
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (that is involving construction works, demolition, or interventions in the natural surroundings)		Yes	✓
		No	No further action required
2. Is the proposed development of a class specified in Part 1 or Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) and does it equal or exceed any relevant quantity, area or limit where specified for that class?			
Yes	✓	N/A	EIA Mandatory EIAR required
No	✓	Class 10(b) (i) & Class 14 Schedule 5 Part 2 of the Planning Regulations	Proceed to Q.3
3. Is the proposed development of a class specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) but does not equal or exceed a relevant quantity, area or other limit specified [sub-threshold development]?			
		Threshold	Comment (if relevant)
		Conclusion	
No	✓	N/A	No EIAR or Preliminary Examination required
Yes	✓	Class 10(b) (i) & Class 14 Schedule 5 Part 2 of the Planning Regulations	Proceed to Q.4

4. Has Schedule 7A information been submitted?

No	✓	Preliminary Examination required
Yes		Screening Determination required

Inspector: _____

Date: _____

Appendix 2 - Form 2

EIA Preliminary Examination

An Bord Pleanála Case Reference	ABP-313553-22	
Proposed Development Summary	The proposed development will consist of: (i) demolition of dwelling and steel shed to the rear and (ii) construction of 2 separate apartment blocks yielding a total of 27 apartments together with all associated site works and services.	
Development Address	No. 17 Richmond Avenue, Fairview, Dublin 3 and No. 19 Richmond Avenue, Fairview, Dublin 3.	
<p>The Board carries out a preliminary examination [Ref. Art. 109(2)(a), Planning and Development Regulations 2001 (as amended)] of, at least, the nature, size or location of the proposed development having regard to the criteria set out in Schedule 7 of the Regulations.</p>		
	Examination	Yes/No/ Uncertain
<p>Nature of the Development</p> <p>Is the nature of the proposed development exceptional in the context of the existing environment?</p>	<p>It is consistent with the nature of development that is deemed to be permissible on land zoned 'Z10' in Dublin's city centre under the Dublin City Development Plan, 2022-2028, with this land use zoning reflecting the emerging pattern of higher density compact mainly residentially dominated redevelopments in this area of the city. The nature of the proposed development is not exceptional with the existing environment which includes existing hotel developments that have in the past been extended.</p>	No.
<p>Will the development result in the production of any significant waste, emissions, or pollutants?</p>	<p>The proposed development would produce standard expected waste, emissions/pollutants that correlate with its nature and extent during demolition, construction, and operational stages. The waste, emissions and/or pollutants are not significant having regard to the nature and the extent of the proposed development, the brownfield nature of this site which is in a built-up inner-city area and can be appropriately managed by standard best practice measures and controls.</p>	No.
<p>Size of the Development</p> <p>Is the size of the proposed development exceptional in the context of the existing environment?</p>	<p>The proposed development would be consistent with the size of development within this area and is similar in nature to the currently under construction redevelopment of No. 15 Richmond Avenue. In this context the size of the proposed development having regard to the character of the surrounding area and the sizes of development present it is not considered</p>	No.

<p>Are there significant cumulative considerations having regard to other existing and/or permitted projects?</p>	<p>to be exceptional in its size, nature, and extent. The height of Block 1 is like that permitted at No. 15 Richmond Avenue and it would not be out of character with the prevailing height of emerging development along Richmond Avenue and on neighbouring sites on and off Richmond Road. In this wider context though Block 2 is of a height that is out of character with permitted developments to the rear of Richmond Avenue it is not out of character with heights on lands zoned 'Z10' and when taken together with the mass, scale and volume of the proposed building would be a scale of development that is denser and more compact than that which characterises this historic setting.</p> <p>There would be no significant cumulative considerations with regards to existing and permitted projects/developments arising from the proposed development if permitted. The surrounding context is an inner city urban landscape where most developments have been completed and where change have been permitted these projects have related to small and medium sized brownfield infill sites that have been factored into the relevant assessment documents.</p>	<p>No.</p>
<p>Location of the Development</p> <p>Is the proposed development located on, in, adjoining or does it have the potential to significantly impact on an ecologically sensitive site or location?</p> <p>Does the proposed development have the potential to significantly affect other significant environmental sensitivities in the area?</p>	<p>The proposed development relates to a brownfield site located in a built-up serviced inner city urban location with no connectivity between it and the nearest Natura 2000 site or any other ecologically sensitive sites or locations.</p> <p>Given the nature of the proposed development, the characteristics of the site, its surroundings through to the nature and extent of development between it and the nearest significant environmentally sensitive area, it would not have the potential to significantly affect significant environmental sensitivities in the area.</p>	<p>No.</p> <p>No.</p>
<p>Conclusion</p>		
<p>There is no real likelihood of significant effects on the environment.</p> <p>EIA not required.</p> <p>This conclusion is based on best scientific data, locational factors, the nature of development sought, the history of the site and its setting, the</p>	<p>There is significant and realistic doubt regarding the likelihood of significant effects on the environment.</p> <p>N/A.</p>	<p>There is a real likelihood of significant effects on the environment.</p> <p>N/A.</p>

<p>permitted developments in the site's setting, the lateral separation distance between the site and nearest Natura 2000 site through to the lack of any evidence for connectivity between it and any other such sites through to the site's serviced inner city location.</p>		
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Inspector: _____

Date: _____

DP/ADP: _____

Date: _____

(Only where Schedule 7A information or EIAR required).