



An
Coimisiún
Pleanála

Inspector's Report ACP-322802-25

Development

Demolition of the existing 2 storey commercial buildings and construction of a mixed use development, comprising a licensed supermarket and, 34 no. apartments and all other site works.

Location

8 & 8A, Saint Marys Road, Crumlin, Dublin 12

Planning Authority

Dublin City Council South

Planning Authority Reg. Ref.

WEB1676/25

Applicant(s)

Real Estate Acquisitions and Sales Limited

Type of Application

Permission

Planning Authority Decision

Refuse

Type of Appeal

First Party

Appellant(s)

Real Estate Acquisitions and Sales Limited

Observer(s)

None

Date of Site Inspection

19th September 2025

Inspector

Ciara McGuinness

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1.0 Site Location and Description

- 1.1. The site is located on a corner site at the junction of St Mary's Road and the R110 Drimnagh Road, approximately 350m north of Crumlin Village. The site consists of a 2-storey development comprising commercial units at ground and first floor level with associated car parking located to the front and side of the building. The existing uses with the building include a childcare facility and a tyre shop. The building is the end unit in a two-storey terrace block, which contains a number of commercial units fronting onto St Mary's Road. There are a number of parking spaces and a bus shelter located to the front of these units.
- 1.2. The property immediately adjoins onto a public footpath and green area formed around the junction of St. Mary's Road and Drimnagh Road. There is an existing bus shelter, c. 8m from the subject site to the north on Drimnagh Road. The Drimnagh Road is a Core Bus Corridor and forms part of the permitted Tallaght – Clondalkin Bus Connects Scheme. Upgrades to St Mary's Road will also take place as part of this scheme including the removal of the existing bus shelter to the front to the commercial units.
- 1.3. The immediate area to the west and south-west comprises two-storey residential housing on Drimnagh Road, St. Mary's Road and St. Mary's Crescent. Other land uses in the area include the Crumlin Children's Health Ireland Hospital, to the immediate north side of the Drimnagh Road, the Jack Potts Bingo at the Star to the immediate east, St. Marys Church to the south, and William Pearse Park to the south-east.
- 1.4. The site has a stated area of 0.08 ha.

2.0 Proposed Development

- 2.1. The proposed development involves the demolition of the existing 2 storey commercial unit and associated shed units and structures which have a combined area of c.465sqm, and the construction of a 2 – 7 storey mixed use development with a total floor area of 3,321sqm.
- 2.2. The proposed development will provide a licensed supermarket at ground floor level (c. 416sqm) and 34 no. 1 bed apartment units at 1st to 6th floor level.

- 2.3. The units comprise the following mix;
- 26 no. 1 Bed Type A – c.50.63sqm
 - 6 no. 1 Bed Type B – 58.63sqm
 - 2 no. 1 Bed Type C – 56.41sqm
- 2.3.1. All apartment units are intended to provide housing for independent living for older residents (55 years plus). The development will provide 68 bed spaces. Each apartment will have access to private open space. Communal open space totalling 247sqm is provided at roof level. No car parking is provided, and the proposal will involve the removal of the existing parking spaces within the site. A total of 57 bikes spaces will be provided: 34 no. spaces for residents, 17 no. spaces for visitors and 6 no. spaces for users/staff of the retail unit.
- 2.3.2. The materials proposed comprise red brickwork with dark grey/black brick at ground floor. Balconies will have galvanised steel balustrades. The windows proposed are red/brown in colour to match the brickwork.
- 2.3.3. Pedestrian access points to the proposed development will be from St Mary's Road and Drimnagh Road. The development also proposes associated bin storage, an ESB substation, residential switch room, commercial unit switch room, generator room, sprinkler tank room, plant room, hard and soft landscaping and all other associated site works and services. The overall site area is stated as 0.80ha.
- 2.3.4. The following documentation was received with the application;
- Planning Report
 - Building Lifecycle Report/Operational Management Plan
 - Architectural Design Statement
 - Engineering Services Report
 - Climate Action Energy Statement
 - Construction Environmental Management Plan
 - Construction Waste Management Plan
 - Construction Traffic Management Plan

- Residential Travel Plan
- Landscape Design Statement
- Appropriate Assessment Screening Report
- Operational Waste Management Plan
- CGI/Verified Views
- Daylight/Sunlight and Shadow Assessment

3.0 Planning Authority Decision

3.1. Decision

The planning authority decided to refuse permission for the following reasons;

1. Having regard to the restricted nature and prominent location of this corner site, it is considered that the proposed development by reason of its scale, massing and form of the development, its relationship to adjacent properties and the inadequate access and servicing arrangements, would represent overdevelopment of an infill site, would be visually obtrusive on the streetscape and would detract from the character and visual amenity of the area. The proposal would contravene Policy SC17 (Building Height) and the performance criteria set out in Table 3 of Appendix 3 of the Dublin City Development Plan 2022–2028 and overall would seriously injure the amenities of the area. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

2. Having regard to the suburban location of the site and the non-provision of car parking for both residential and commercial uses alongside inadequate access and servicing arrangements, it is considered that the proposed development would be likely to give rise to unacceptable levels of overspill and haphazard parking on adjacent heavily trafficked roads and bus corridors, would seriously injure the amenities of the area and would endanger public safety by reason of traffic hazard and obstruction of pedestrians, bus services and other road users. It is also considered that the proposed development would be contrary to Policy SMT27 of the 2022-2028 City Development Plan which requires, inter alia, the provision of sustainable levels of car parking and car storage in residential schemes and the

safeguarding of the residential parking component in mixed-use developments. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Reports

The Planner's Report (dated 22nd May 2025) can be summarised as follows;

- The site is located in an area governed by the landuse zoning 'Sustainable Residential Neighbourhoods – Zone Z1' with the objective 'to protect, provide and improve residential amenities'. 'Residential' and 'shop (local)' are permissible uses under the site's zoning. The proposed development is acceptable in principle subject to an assessment of the impacts of the proposed development on the surrounding area and compliance with relevant Development Plan criteria.
- The site is located in the Outer Employment and Residential Area. Plot ratio standards range from 1.0 - 2.5 and site coverage standards range from 45%-60% in this area. Higher plot ratio and site coverage may be permitted in certain circumstances. The stated plot ratio for the site is 4.1 and site coverage is 81% which are significantly above the Development Plan standards. The proposed development will have a density of 211 uph when calculated by bedspaces provided. The rationale for calculations is acceptable having regard to the shared accommodation typology.
- It is considered that a reduced height is required as the current proposal would contravene Policy SC17 and the performance criteria set out in Table 3 of Appendix 3 of the Dublin City Development Plan 2022–2028.
- The scale/height of the 7-storey building reads as 8 storeys with the parapet wall extending above roof level by 3m and lift overrun, stairwell and lobby area providing access to rooftop private open space.
- The report notes the concerns of the Transportation Planning Division. See section 3.2.2 below.

3.2.2. Other Technical Reports

- Drainage Division: Report dated 30/04/2025 – Request Further Information. Inconsistencies in the areas provided for Green/Blue roofs and the area shown as the terrace on the landscape drawings.
- City Archaeologist: Report dated 08/05/2025 – Request Further Information. Submit a revised Visual Impact Assessment which addresses the impact of the proposed development on the setting of the recorded monument St. Mary's Church.
- Transportation Planning Division: Report dated 14/05/2025 – Recommend Refusal. Refusal reason no. 2 above refers. The absence of any dedicated parking provision within the proposed development is likely to result in increased overspill parking onto surrounding residential streets which are already under pressure from uncontrolled on-street parking. While public transport options are noted, they do not, in themselves, justify the complete omission of car parking within the proposed development, particularly given the site's suburban context and the pressures on surrounding uncontrolled parking. The cycle parking provision lacks the capacity, quality, and accessibility needed to support a car-free development and does not promote a meaningful shift toward sustainable travel. The applicant has also failed to demonstrate that service and delivery access would not result in a negative impact on St. Mary's Road. Should further information be sought a robust servicing strategy for the site should be requested with servicing taking place within the redline boundary.

3.3. Prescribed Bodies

NTA - To mitigate any conflicts during potential concurrent construction phases, the NTA requests that the developer liaise with the NTA before the construction stage commences to coordinate their works with the Tallaght/Clondalkin Core Bus Corridor construction stage.

3.4. Third Party Observations

There were 7 no. third party observations received in relation to the application. The issues raised relate primarily to the height, scale and massing of the development,

the impact on the visual amenity and character of the area, the lack of adequate parking and the impact on residential amenity.

4.0 Planning History

PA Reg Ref 1081/01: Permission Refused by DCC for change of use from retail, on ground floor to office use, modifications to front elevations and retention of existing wall to rear.

PA Ref Reg 1887/01: Permission Granted by DCC for change of use from retail on ground floor to Training Centre, modifications to front elevations and retention of existing wall to rear.

PA Reg Ref 3414/18: Permission Granted by DCC for a change of use from original ground floor retail flooring showrooms to afterschool care and activity centre with preschool sessional classes and retention of existing ground floor internal alterations and non-illuminated external signage.

5.0 Policy Context

5.1. Dublin City Development Plan 2022-2028

- 5.1.1. The site is governed by the policies and provisions contained in the Dublin City Development Plan 2022-2028 (referred to hereafter as the CDP). The site is zoned Z1 for sustainable residential neighbourhoods where the objective is “*to protect, provide and improve residential amenities*”.
- 5.1.2. There are numerous policies with the plan that promote sustainable density, compact development, and the efficient use of urban land. The following policies are considered relevant for assessment purposes;

Policy QHSN47 High Quality Neighbourhood and Community Facilities - To encourage and facilitate the timely and planned provision of a range of high-quality neighbourhood and community facilities which are multifunctional in terms of their use, adaptable in terms of their design and located to ensure that they are accessible and inclusive to all. To also protect existing community uses and retain them where there is potential for the use to continue.

Policy CA6 Retrofitting and Reuse of Existing Buildings - To promote and support the retrofitting and reuse of existing buildings rather than their demolition and reconstruction, where possible. See Section 15.7.1 Re-use of Existing Buildings in Chapter 15 Development Standards.

Policy SMT27 Car Parking in Residential and Mixed-Use Developments -

- (i) To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (see Appendix 5) so as to promote city centre living and reduce the requirement for car parking.
- (ii) To encourage new ways of addressing the transport needs of residents (such as car clubs and mobility hubs) to reduce the requirement for car parking.
- (iii) To safeguard the residential parking component in mixed-use developments.

Policy SC17 Building Height - To protect and enhance the skyline of the city, and to ensure that all proposals with enhanced scale and height:

- follow a design led approach;
- include a masterplan for any site over 0.5ha (in accordance with the criteria for assessment set out in Appendix 3);
- make a positive contribution to the urban character of the city and that responds positively to the existing or emerging context;
- deliver vibrant and equitable neighbourhoods that are walkable, compact, green, accessible, mixed and balanced;
- Do not affect the safety of aircraft operations at Dublin Airport (including craneage); and
- have regard to the performance-based criteria set out in Appendix 3.

All new proposals in the inner city must demonstrate sensitivity to the historic city centre, the River Liffey and quays, Trinity College, the cathedrals, Dublin Castle, the historic squares and the city canals, and to established residential areas and civic spaces of local and citywide importance.

- 5.1.3. Chapter 15 sets out development management standards for residential development. In relation to apartment uses, the majority of the design standards in Chapter 15 align with the Apartment Guidelines noted below.
- 5.1.4. Section 15.7.1 relates to the re-use of existing buildings. Where development proposal comprises of existing buildings on the site, applicants are encouraged to reuse and repurpose the buildings for integration within the scheme, where possible. Where demolition is proposed, the applicant must submit a demolition justification report to set out the rational for the demolition having regard to the ‘embodied carbon’ of existing structures and demonstrate that all options other than demolition, such as refurbishment, extension or retrofitting are not possible; as well as the additional use of resources and energy arising from new construction relative to the reuse of existing structures.
- 5.1.5. Appendix 3 of the plan sets out guidelines on how to achieve appropriate and sustainable compact growth. It sets out a list of criteria to be met in tables 3 and 4 to justify provision of a building taller than the prevailing height. These include matters such as promoting a sense of place and character, providing legibility, high quality places, a diversity of activities and protection of historic environments from insensitive development. Taller/landmark buildings must demonstrate, inter alia, exemplary architecture, sustainable design and green credentials and good quality public realm.

5.2. Section 28 Guidelines:

5.2.1. Urban Development and Building Heights Guidelines for Planning Authorities

These guidelines set out national planning policy guidelines on building heights in relation to urban areas, as defined by the census. They require that the scope to consider general building heights of at least three to four storeys, coupled with appropriate density, in locations outside what would be defined as city and town centre areas, and which would include suburban areas, must be supported in principle at development plan and development management levels. 4 no. Specific Planning Policy Requirements (SPPRs) are specified and while the first two relate to plan and policy making, SPPRs 3 and 4 are more focussed on implementation and require more diversity and flexibility to secure more compact settlements and taller

buildings. The guidelines set out a list of development management criteria to aid in the assessment of proposed taller buildings.

5.2.2. Guidelines for Planning Authorities: Design Standards for New Apartments, 2023

Note: Circular Letter NSP 03/25 confirms that the Design Standards for New Apartments, Guidelines for Planning Authorities (2025) are not applicable to the current development before the Commission. The Apartment Guidelines (2025) are applicable to any application for planning permission or to any subsequent appeal or direct application to An Coimisiún Pleanála submitted after the issuing of the Guidelines, i.e. from 9th July 2025. The Design Standards for New Apartments, Guidelines for Planning Authorities (2023) applies to current appeals or applications that were the subject of consideration within the planning system on or before the 8th of July 2025.

The guidelines, hereafter referred to as the Apartment Guidelines, provide quantitative and qualitative standards for apartment development across a range of thresholds depending on the number of units proposed and the site's context. It also sets out SPPRs to be adhered to across a range of parameters including unit mix, car parking and minimum floor areas. Applicable standards for the proposed development include requirements of SPPR 3 (minimum floor areas, and by reference to Appendix 1, minimum storage and private open space areas), SPPR 4 (33% to be dual aspect units in more central and accessible urban locations), SPPR 5 (minimum 2.7m requirement for ground level floor to ceiling height).

5.2.3. Sustainable Residential Development and Compact Settlement Guidelines

The guidelines, hereafter referred to as the Compact Settlement Guidelines, set out a context to create higher density settlements to underpin sustainable development principles. Specific Planning Policy Requirements (SPPRs) are set out including SPPR 1 which refers to minimum standards for separation distances between residential units and opposing windows in habitable rooms.

5.3. Natural Heritage Designations

The site is situated c.7km west of South Dublin Bay Special Area of Conservation and proposed Natural Heritage Area (pNHA) as well as South Dublin Bay and River Tolka Estuary Special Protection Area.

The Grand Canal proposed NHA is also situated c.1km north of the site.

5.4. EIA Screening

The proposed development has been subject to preliminary examination for environmental impact assessment (refer to Form 1 and Form 2 in Appendices of this report). Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.

6.0 The Appeal

6.1. Grounds of Appeal

The grounds of appeal can be summarised as follows;

Reason for Refusal 1

- The proposed development is suitable for an increased plot ratio given its location immediately adjacent to a Core Bus Corridor due to be upgraded as part of the Tallaght/Clondalkin Bus Connects scheme.
- Table 2 of Appendix 3 lists the plot ratio and site coverage standards as 'indicative' and therefore proposals should be assessed on a case-by-case basis.
- The proposed development is 2-7 storeys with a landscaped terrace at roof level. There is no 8-storey element.
- The parapet element of the development contributes towards the achievement of a unique architectural character of the building. The preparation of a

Daylight, Sunlight and Shadow Assessment and Verified View

Photomontages, demonstrates that this element of development does not impact the amenity of any surrounding existing residential developments.

- The Planner's Assessment accepts that the fundamental design of the scheme is acceptable, noting that the scheme does not have any overbearing or overshadowing impacts to neighbours and that the scheme itself complies with all fundamental design requirements of the Apartment Guidelines.
- The applicant has prepared Alternative Design Options 1 and 2, which shows 2 no. potential arrangements for a reduced parapet height at roof terrace level. A third alternative design option reduces the proposed development by a storey.

Refusal Reason 2

- No pre planning feedback was provided from the Dublin City Transport Planning Department.
- Zero car parking is a feature of this development typology. A number of precedents are referenced in this regard.
- The provision of zero car parking for the subject scheme is appropriate given that the end users of the development will not require car parking and will be selected by the Approved Housing Body having regard to their non-requirement for car parking provision.
- The site falls within the 'City – Urban Neighbourhoods' categorisation as listed in the Compact Settlement Guidelines. SPPR 3 in this regard seeks to minimise, substantially reduce or wholly eliminate parking.
- The provision of zero car parking for the commercial development is also considered appropriate. As per Appendix 5, Table 2, of the CDP there is a maximum provision of 1 car parking space per 275sqm for 'Other Retail and Main Street Uses' for sites located within Zone 2. The proposed development includes a retail unit of c.416sqm meaning that 1 car space would be required. It was considered appropriate to not provide the single required space based on the relatively small size of the unit, the quantum of bicycle parking, and the

site location along a core bus corridor. A number of retail units with no dedicated parking along key radial routes are provided as precedents.

- There is opportunity in the surrounding area for any short-term visitors to the site to legally park a vehicle and make a short walk to the development.
- Whilst the location of the Luas c.1.1km to the north of the site is beneficial in terms of providing additional public transport connections from the subject site, it has not been accounted as a factor that contribute towards the appropriateness of the provision of zero parking.
- The subject scheme aligns with the requirements of Policy SMT 27. The subject site is designated as 'Zone 2' with regards to car parking and falls under the land use category of 'Elderly Persons Housing, Sheltered Housing' meaning that maximum parking standards of 1 space per 2 dwellings apply as per Appendix 5 of the CDP. There are provisions for the relaxation of car parking requirements under the Apartment Guidelines and Compact Settlements Guidelines. Given the site's proximity to high-frequency public transport, connectivity to local services and amenities and the profile of the future tenants, it is considered appropriate to provide zero car parking at this location.
- The provision of bicycle parking complies with the standards of the CDP.
- A revised ground floor plan has been submitted to address serving, access and cycle parking concerns.

6.2. Planning Authority Response

A response from Dublin City Council requests that the Commission uphold the decision to refuse permission. It is also requested that if granted the following conditions be applied;

- a Section 48 development contribution,
- a bond condition,
- a naming and numbering condition,
- a management company condition

6.3. Observations

One observation was received on the appeal from Mr. Lorcan Martin. It is stated that the appeal submission fails to address the concerns outlined in their submission on the application. The issues raised relate to the inappropriate scale, height and massing of the proposed development, the impact on established residential amenities, car parking, the loss of childcare facilities and water pressure.

7.0 Assessment

7.1. Having examined the application details and all other documentation on file, including the grounds of appeal, the reports of the local authority, and having inspected the site, and having regard to the relevant local/regional/national policies and guidance, I consider that the substantive issues in this appeal to be considered can be assessed under the following headings:

- Principle of Development
- Scale, Massing & Height
- Parking
- Access and Servicing Arrangements
- Residential amenity

7.2. Principle of Development

7.2.1. The site is zoned 'Sustainable Residential Neighbourhoods – Zone Z1' with the objective *'to protect, provide and improve residential amenities'*. 'Residential' and 'shop (local)' are permissible uses under the site's zoning. The proposed development is considered acceptable in principle subject to an assessment of the impacts of the proposed development on the surrounding area and compliance with relevant Development Plan criteria.

7.2.2. In order to facilitate the proposed development, the proposal also includes the demolition of the existing two-storey buildings at 8 & 8A St. Mary's Road. Section 15.7.1 of the CDP states that *'Where demolition is proposed, the applicant must submit a demolition justification report to set out the rationale for the demolition having*

regard to the ‘embodied carbon’ of existing structures and demonstrate that all options other than demolition, such as refurbishment, extension or retrofitting are not possible; as well as the additional use of resources and energy arising from new construction relative to the reuse of existing structures.’ I note that a Planning Application Report, Climate Action Energy Statement and Building Lifecycle Report have been submitted with the application, however, there is no specific report in relation to demolition or any justification outlined within the aforementioned reports.

- 7.2.3. I note also that the demolition of the existing building would lead to the loss on existing childcare facility. This has been referenced in a number of the third-party observations on the file. The Planning Authority considers the loss of the childcare facility as ‘regrettable’. I note that Policy QHSN47 ‘High Quality Neighbourhood and Community Facilities’ seeks to *‘protect existing community uses and retain them where there is potential for the use to continue.’* While the applicant has demonstrated that there are other facilities within the site, the capacity of these facilities has not been demonstrated, nor has the potential for the use to continue in the proposed development been considered.
- 7.2.4. Having regard to the above, I am not satisfied that the proposed development is in compliance with Section 15.7.1 of the CDP or Policy QHSN47 ‘High Quality Neighbourhood and Community Facilities’. This is a new issue, and the Board may wish to seek the views of the parties. However, having regard to the other substantive reasons for refusal set out below, it may not be considered necessary to pursue the matter.

7.3. Scale, Massing & Height

- 7.3.1. Reason for refusal no. 1 relates to the scale, massing and form of the development, its relationship to adjacent properties, and as a result its non-compliance with Policy SC17 (Building Height) and the performance criteria set out in Table 3 of Appendix 3. I note the surrounding area is low-medium density primarily comprising two storey terraced structures with the bingo hall and the children’s hospitals being the only structures in the immediate vicinity extending above the prevailing height.
- 7.3.2. Table 2 of Appendix 3 of the Development Plan sets out indicative Plot Ratio and Site Coverage for different areas. The site is located within the ‘Outer Employment

and Residential Area' where an indicative plot ratio of 1.0-2.5 and site coverage of 45%-60% apply. The stated plot ratio for the site is 4.1 and site coverage is 81% which are significantly above the Development Plan standards.

7.3.3. In terms of density, Table 1 of Appendix 3 of the Development Plan sets out Density Ranges for different areas. The site is located within the 'Outer Suburbs' which provides for a net density range of 60 -120 no. units per hectare. The Development Plan notes that there will be a general presumption against schemes in excess of 300 units per hectare. Table 3.1 of the Sustainable and Compact Settlement Guidelines indicate that it is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin. The Compact Settlement Guidelines also state that there is a presumption in these Guidelines against very high densities that exceed 300 dph (net) on a piecemeal basis. Densities that exceed 300 dph (net) are open for consideration on a plan-led basis only and where the opportunity for densities and building heights that are greater than prevailing densities and building height is identified in a relevant statutory plan.

7.3.4. The documentation with the application indicates that the proposed development will have a density of 421 units per hectare, however when calculated by bedspaces the scheme will have density of 211 uph. The submitted Planning Application Report states that *'given the unique development typology of the scheme providing entirely 1 bed apartment units for independent living units for older people, to be operated by an Approved Housing Body, that the scheme should be considered as an equivalent typology to shared accommodation when assessing density'* and refers to the Compact Settlement Guidelines which states *'When calculating net densities for shared accommodation, such as student housing, four bed spaces shall be the equivalent of one dwelling'*. The rationale is accepted by the Planning Authority and the density is considered acceptable.

7.3.5. While appendix 3 also sets out that there is recognised scope for height and density intensification within the catchment of major public transport corridors (including Bus Connects/Core Bus Corridors), it is noted that all proposals with significant increased height and density over the existing prevailing context must demonstrate full compliance with the performance criteria set out in Table 3.

7.3.6. My assessment of the proposed development against the 10 no. objectives of Table 3 is set out in the Table below.

Table 3: Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale

Objective	Performance Criteria in Assessing Proposals for Enhanced Height, Density and Scale
1. To promote development with a sense of place and character.	The proposed development would not integrate well with the streetscape as it would exceed the prevailing building height and density in the immediate area. The design is distinctive but is monolithic and does not respect the existing character of the area. Overall, I am of the view that the proposed density of the development would be excessive, out of character with the surrounding area and would constitute overdevelopment.
2. To provide appropriate legibility.	As above, the increased density of the proposal does not, in my opinion, respond to the context of the surrounding area and would not contribute positively to the streetscape due to an inappropriate juxtaposition between existing and proposed building heights.
3. To provide appropriate continuity and enclosure of streets and spaces.	The proposed height of 7 storeys is not considered appropriate in this instance. The transition from the surrounding two-storey context is considered too abrupt, resulting in a building that would appear visually dominant and incongruous within the streetscape.
4. To provide well connected, high quality and active public and communal spaces.	An appropriate level of secure and accessible cycle parking is proposed (refer to Section 7.4 below). This site is also situated close to high quality public transport corridors. Communal open space is situated on rooftop terraces.

5. To provide high quality, attractive and useable private spaces.	All 34 units would be provided with the required quantum of private open space.
6. To promote mix of use and diversity of activities.	The provision of commercial use at ground floor is welcomed. I am of the view that residential and commercial is a suitable mix of uses for this site.
7. To ensure high quality and environmentally sustainable buildings	The applicant has submitted a Daylight/Sunlight study, the results of which are considered acceptable. A Climate Action Energy Statement is submitted with the application. The Engineer's Report includes a desktop Flood Risk Assessment which confirms the site is in Flood Zone C. Inconsistencies in relation to the areas provided for Green/Blue roofs are noted by the Drainage Division. I am satisfied surface water drainage provisions in compliance with the requirements of the Planning Authority could be secured by condition.
8. To secure sustainable density, intensity at locations of high accessibility.	The site is situated close to a high-quality public transport corridor and has eliminated all car parking proposals on the site. Adequate cycle parking is proposed. Whilst I accept that the public transport provision would justify the principle of a higher density scheme, I am of the view that the proposed density and scale would be excessive.
9. To protect historic environments from insensitive development.	The site is not within a conservation area or architectural conservation area. There are no protected structures within the immediate vicinity of the site. St. Marys church, a recorded monument, is c. 200m to the south of the site. I am of the view that there is sufficient separation distance between the church and the proposed development and that the proposed development would have a minimal impact

	on the Church. The site comprises a prominent corner site. While there is capacity to achieve a focal corner building at this location, a balance would need to be struck with respecting the existing character of the area which is predominantly 2-storey.
10.To ensure appropriate management and maintenance.	The applicant has submitted a Building Lifecycle Report/Operational Management Statement.

7.3.10. In my view, the proposed development does not comply with the performance criteria listed above from Table 3 of Appendix 3 of the CDP and therefore the increased height, along with the exceedances of site coverage and plot ratio, as proposed is not justified or considered appropriate in my opinion for the site. I have also highlighted above how the prevailing density is much lower. In this regard, I agree with the Planning Authority with regards to refusal reason no. 1.

7.3.11. I note that the applicant has provided alternative design solutions as part of the appeal in an effort to address the planning authorities concerns which include a reduction in parapet height and a reduction in height to 6 no. storeys. I have reviewed the above revised proposals and consider the changes to be minor, non-material amendments. I consider that the scale, massing and form of the revised proposals, would continue to represent overdevelopment of the site and be contrary to Policy SC17 (Building Height) and the performance criteria set out in Table 3 of Appendix 3 of the CDP.

7.4. Parking

Car Parking

7.4.1. Reason for refusal no. 2 relates to the non-provision of car parking and the likely unacceptable levels of overspill and haphazard parking on adjacent roads, which would seriously injure the amenities of the area and endanger public safety. I have reviewed the applicant's planning application report and appeal which sets out a rationale for the non-provision of car parking. The report references the proximity of

the site to high frequency public transport services; the facilities and services available for residents in Crumlin village c. 500m to the south; and end users of the development (older people seeking to live independently) who have no requirement for car parking. It is noted that the site benefits from several existing bus routes along the Drimnagh Road, as well as the permitted Tallaght/Clondalkin Bus Connects Core Bus Corridor. The nearest Luas stop (Drimnagh) is approximately a 19-minute walk from the site.

- 7.4.2. I have reviewed relevant development plan provisions. The City Council area is divided into 3 areas for the purpose of parking control. The site is located in Zone 2 which occurs alongside key public transport routes. Appendix 5 Table 2 sets out the 'Maximum Car Parking Standards for Various Uses'. The standards relevant to the proposed development are outlined below.

Elderly Persons Housing/ Sheltered Housing	1 per 2 dwellings
Retail and Retail Service - Other Retail and Main Street	1 per 5 staff 1 per 100sqm GFA

- 7.4.3. Accordingly, the maximum permitted parking provision for the residential element of the development is 17 no. spaces. The retail element of the proposal has an area of c. 416 sqm, meaning that the maximum permissible car parking provision would be 1 no. spaces.

- 7.4.4. The applicant considers that zero car parking is an established practice for the proposed typology given that the end users of the development will not require car parking. Furthermore, it was considered appropriate to not provide car parking for the retail unit given its small size of c. 416 sqm, the quantum of bicycle parking provided, the site location along a Core Bus Corridor due to be upgraded as part of Bus Connects and the surrounding residential context, meaning that the unit will function as a 'local shop' for existing residents of the surrounding area. The applicant points to SPPR 3 of the Compact Settlement Guidelines which states that in city centres and urban neighbourhoods of the five cities, parking provision should be minimised, substantially reduced, or wholly eliminated.

- 7.4.5. The Planning Authority appears to accept the principle of reduced car parking but does not support the zero-parking provision at this location. The report of the Transport Division considers that the Planning Application Report offers a limited rationale citing proximity to public transport and the intended occupancy by individuals aged 55 plus for the zero-parking provision. It is considered that this justification does not sufficiently address the site's specific context, and the Divisions concerns in relation to the significant pressure on street parking within proximity to the site. It is considered by the Transport Division that the absence of any dedicated parking provision within the proposed development is likely to result in increased overspill parking onto surrounding residential streets. While the public transport options are noted, they do not in themselves justify the complete omission of car parking within the proposed development, particularly given the site's suburban context and the pressures on surrounding uncontrolled parking.
- 7.4.6. I note that the development plan (Appendix 5) states a relaxation of maximum standards will be considered in Zone 2 for a site within a highly accessible location. Applicants must set out a clear case satisfactorily demonstrating a reduction of parking need for the development based on a number of criteria. The applicant has in general set out their case in the Planning Application Report, the Outline Residential Travel Plan and the appeal documentation. My assessment of the proposed development against the criteria is set out in the Table below.

Locational suitability and advantages of the site	The site is in close proximity to high frequency public transport services (listed below). There are facilities and services available for residents in Crumlin village c. 500m to the south. End users of the development are older people seeking to live independently who have no requirement for car parking.
Proximity to High Frequency Public Transport services (10 minutes' walk).	<u>St Mary's Road</u> The S4 Orbital - frequency of approximately every 10 minutes between services in both directions.

	The 150 bus - frequency of approximately every 20 minutes between services in both directions, with an increase to 15 minute 'tidal' frequency during the AM and PM peak periods. <u>Crumlin Road/Drimnagh Road</u> Frequent services include the 27, 56A, 77A, 123 ,125 and 151. This corridor forms part of the D-Spine Route in the Tallaght/Clondalkin to City Centre Bus Connects proposals (D1, D2, D3, D4 and D5 will all pass along this route – replacing several of the existing bus routes listed above) and will interconnect with the existing S4 Orbital.
Walking and cycling accessibility/permeability and any improvement to same	Issues in relation to cycle parking have been addressed in the appeal documentation (see cycle parking section below). Location of external Sheffield bike stands may impact upon pedestrian flow. Pressure on street parking may result in vehicles either partly or entirely parked on the pavement, obstructing pedestrian flow.
The range of services and sources of employment available within walking distance of the development.	The surrounding area is a mix of village centre uses (retail, community and leisure), with Crumlin Children's Hospital on the opposite side of the R110 Drimnagh Road/Crumlin Road.
Availability of shared mobility	There is an existing GoCar base to the west at the Drimnagh Road/Long Mile Road junction (approximately 600m walk) and to

	the south of St Agnes Park (at Spar), approximately 1km walk from the site.
Impact on the amenities of surrounding properties or areas including overspill parking	There is significant car parking pressure already in the area as witnessed on the day of my site visit. While the end user of the development is noted, there is likely to be an element of visitor parking demand associated with the apartments which will be accommodated on the surrounding streets.
Impact on traffic safety including obstruction of other road users	Access and servicing arrangements are not satisfactory and are likely to impact on road users. Refer to Section 7.5 below.
Robustness of Mobility Management Plan to support the development	An Outline Residential Travel Plan is submitted with the application. The Transport Division have noted that it does not appear that an increase in sustainable transport measures has been proposed, given the no car parking provision is proposed. I note policy SMT27 also seeks to encourage new ways of addressing the transport needs of residents (such as car clubs and mobility hubs) to reduce the requirement for car parking. No such measures are included.

7.4.7. I have noted in the table above that overspill parking is an issue in the area. At the time of my site inspection, which was early afternoon on a Friday, it was clear that the surrounding streets are very intensively parked. The surrounding streets do not appear to be subject to any parking controls in terms of resident permits or pay and display. Most available parking spaces were occupied and there were several vehicles either partly or entirely parked on the pavement, obstructing pedestrian flow.

It would be reasonable to assume that this would be further exacerbated in the evenings when most people return from work, as well as during those times when the bingo hall is operating. It is therefore clear that there are significant parking issues in the immediate area and that pedestrian and cycle movement is compromised due to the hazardous parking of vehicles.

7.4.8. Whilst I am supportive of reduced car parking on this site, I would share the valid concerns of the Planning Authority and observers on the application/appeal in terms of potential additional overspill parking onto already heavily parked and compromised streets. I acknowledge that the introduction of on street parking controls and the provision of improved pedestrian and cyclist infrastructure on local streets are not within the Applicant's gift. I also accept that the Residential Travel Plan (which includes the proposed appointment of a Travel Plan Coordinator) could be reinforced by way of condition to secure further clarity on how zero parking provision would be communicated to future residents in addition to the promotion of sustainable methods of transport, including the improved cycle parking offered as part of the appeal. However, in my view, having regard to the existing context and parking pressures, the provision of 34 apartments and a commercial unit with no parking provision, would undoubtedly lead to a further deterioration in local parking availability, disorderly car parking, and an obstruction of other road users resulting in the creation of a traffic hazard. In my opinion, the appeal should be refused on this basis.

7.4.9. I acknowledge that precedents have been noted by the applicant and by the Transport Division, with regard to schemes where no parking provision was deemed either acceptable or unacceptable respectively. I consider that each application must be assessed on its own merits and having regard to its own specific context. Overall, I consider that the proposed development would be likely to exacerbate the current levels of overspill and haphazard parking on adjacent heavily trafficked roads and bus corridors. I consider that the proposed development would be contrary to Policy SMT27 of the Development Plan which requires developments to provide sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards. The policy further states that developments must encourage new ways of addressing the transport needs of residents (such as car clubs and mobility hubs) to reduce the requirement for car

parking, and must safeguard the residential parking component in mixed-use developments. In this regard, I do not consider that the applicant has adequately justified the proposal for zero parking provision.

Cycle Parking

- 7.4.10. The planning application proposed a total of 57 bikes spaces; 34 no. spaces for residents, 17 no. spaces for visitors and 6 no. spaces for users and staff of the retail unit. The Transport Division has concerns regarding the viability of a car free development where only the minimum cycle parking levels and basic supporting infrastructure is being provided. Issues are raised specifically with regards to the lack of division between long term and short term parking, the nature of the two-tier cycle parking and its difficulties in accommodating heavier bikes including e-bikes, constraints in the bike store with regards to manoeuvring bikes into the two-tier stand, lack of specific parking for cargo bikes, and the lack of parking for adaptable trikes and similar equipment for older individuals. It is also noted that the proposed placement of the 4 no. external Sheffield stands may impact upon the pedestrian flow on the public footpath. Overall, the Transport Division consider that the proposed cycle parking provision for this development is poor and sub-standard.
- 7.4.11. Table 2 of Appendix 5 of the CDP sets out the 'Bicycle Parking Standards for Various Uses'. The standards relevant to the proposed development are outlined below.

Residential Apartment (Include provision for e-bikes/cargo bikes/bike trailers/adapted bikes)	Long term - 1 per bedroom Short Term – 1 per 2 apartments
Elderly People Accommodation	Long term - 1 per 5 staff, 1 per 5 residents Short Term – 1 per 10 residents
Retail	1 per 5 staff 1 per 100sqm GFA

- 7.4.12. I note the Apartment Guidelines state that a general minimum standard of 1 cycle storage space per bedroom shall be applied, and visitor cycle parking shall also be

provided at a standard of 1 space per 2 residential units. I note that the applicant and Planning Authority are seeking compliance with the standards set out in the Apartment Guidelines and the Residential Apartment Land Use category outlined above.

7.4.13. The applicant has submitted a revised ground floor plan with the Grounds of Appeal. An additional bicycle storage area has been incorporated within the proposed building to accommodate 14 no. bicycle spaces for residential use, across 7 no. two-tier bicycle stands. The original bicycle storage area has been revised to provide for 42 bicycles, including 20 no. resident cycle spaces, 18 no. cycle spaces for visitors and 4 no. cycle spaces for staff. 2 no. cargo cycle spaces have also been provided. Externally a Sheffield type cycle parking stand has been provided for to accommodate 8 no. customer bicycles for the commercial unit.

7.4.14. I consider that the cycle parking provision has been improved by the above changes. However, the improved cycle parking, whilst welcomed, would not outweigh my concerns regarding the impacts of no car parking provision referred to above and the resultant impact on the amenities of the area.

7.5. Access and Servicing Arrangements

7.5.1. I note that inadequate access and servicing arrangements are referenced in both refusal reasons. Documentation with the application indicates that pedestrian and cycle access and egress to the residential part of the development will be from the wide footpath area which is set back from Drimnagh Road. The development also proposes a set down/loading bay on St. Mary's Road inside the existing cycle lane, with a footpath along the new front elevation of the proposed retail unit.

7.5.2. The Transportation Planning Division have outlined a number of issues with regards to the proposed servicing and access arrangements which are summarised as follows;

- It is unclear how the adjacent sites will be able to safely access and egress. At present, dropped kerbs on both sides of the bus stop facilitate a one-way in, one-way out system.

- Bin store doors are noted as opening outwards on the area which is proposed to be taken in charge by Dublin City Council, which is not acceptable.
- The proposed bay is outside the redline boundary. It is noted within planning report that the loading bay is to be implemented by Traffic Advisory Group (TAG). This was not agreed with the Environment and Transportation department. Following consultation with TAG, it was noted that in principle, the proposed location and size of the loading bay are not acceptable. The bay is situated approximately 8m from the signalised junction. The bay's considerable size contributes to apprehensions that overspill parking may occur within the bay itself, thereby rendering it ineffective for its intended purpose of loading.
- Additionally, to facilitate the loading bay for the site it is proposed to remove the bus shelter. While the bus stop is to be removed under the permitted Tallaght/ Clondalkin Bus Connects works no interim plan has been proposed for the existing bus shelter which serves route 27,150 and S4.

7.5.3. As part of the appeal that applicant has submitted revised site plans with a revised loading bay layout for the scheme for both the existing road condition and the condition of the road when BusConnects upgrades are undertaken along St Mary's Road. It is submitted that one of the loading bay options for the site will be agreed with the Dublin City Transport Advisory Group post planning, depending on the condition of the site at the time of construction and the planned implementation of BusConnects upgrades along St Mary's Road. Whilst the concerns of Dublin City Council are noted regarding the potential for overspill parking within any proposed loading bay, the applicant has noted that it is not within their remit to control. Any overspill parking within a loading bay contravenes local by-laws in place and is dealt with accordingly.

7.5.4. I have reviewed the revised proposal. I note that the red line boundary has not been altered and that the proposed bay remains outside the applicants red line boundary. No blue boundary is shown on the submitted maps. The proposed bay is critical element for the functioning of the commercial element of the proposed development and would warrant consideration and agreement as part of the proposed development. In the absence of any agreement or consent from the Environment

and Transportation Department and/or Traffic Advisory Group, I cannot be satisfied that the proposed development loading bay is acceptable.

7.5.5. I note the revised ground floor plan now shows the bin store doors opening inwards. However, no commentary is provided with regard to the access and egress arrangements for the adjoining commercial units. During my site visit I noted that the dropped kerbs on either side of the bus stop facilitated access and egress for the parking spaces to the front of the commercial units. It is not clear how the revised proposals for the loading bay would interact with the existing access and egress arrangements.

7.5.6. I am not satisfied that the applicant has appropriately dealt with the above issues in the application or appeal documentation. The applicant has failed to demonstrate that the proposed development, and in particular the service and delivery access arrangements would not result in a negative impact on St. Marys Road or the adjoining junction. This is a substantive issue, and I agree with the Planning Authority that refusal would be warranted based on the inadequate access and servicing arrangements.

7.6. Residential Amenity

7.6.1. Many of the observations raise concerns with regards to the impact of the proposed development on adjoining residential amenity. Topics raised include increased noise and disturbance during construction and operational phases of the development, loss of light, overshadowing and overlooking.

7.6.2. I note that the applicant has submitted a Construction Environmental Management Plan and a Construction Traffic Management Plan. While it is acknowledged that the construction phase of development would result in some disturbance for local residents, I am satisfied that any impacts would be local and temporary in nature and that the implementation of a Construction Management Plan and Traffic Plan would mitigate against any potential significant impacts. Furthermore, having regard to the existing commercial uses on site and within the wider terrace block, I do not consider that the proposal for mixed use development, comprising a commercial development and housing for the elderly, will result in any increased operational noise or disturbance.

- 7.6.3. The applicant has submitted a daylight/sunlight study which includes an assessment of daylight/sunlight provision to no.'s 1 – 5A St. Mary's Road, no. 382 Kildare Road and 425 Crumlin Road, no.'s 23 – 25 Drimnagh Road and no. 10 St. Mary's Road. The assessment indicates that all tested windows comply with the BRE standards relating to VSC and APSH. The study has not tested sunlight levels to gardens/private amenity spaces. However, having regard to the site location and orientation, it is not considered that any garden/private amenity spaces will be significantly impacted.
- 7.6.4. The proposed development is positioned to the side of no. 10 St. Mary's Road (set forward of the adjacent building line) and the side of no. 23 Drimnagh Road (although predominantly forwards of the building line to that dwelling). Inevitably, the scale of the proposed building will result in additional overbearing impacts. The scale of the building is addressed above in Section 7.3. Due to the positioning, separation distances and existing built context, it is not considered that the development will result in excessive overlooking.
- 7.6.5. In conclusion, I am satisfied that the proposed development is acceptable from a residential amenity perspective

8.0 AA Screening

I have considered the proposed development in light of the requirements S177U of the Planning and Development Act 2000 as amended.

The subject site is located in a fully serviced urban area and is not immediate to a European Site.

The proposed development is for a mixed-use development, comprising a licensed supermarket and, 34 no. apartments as set out in Section 2 of this report.

No nature conservation concerns were raised in the planning appeal.

Having considered the nature, scale and location of the project, I am satisfied that it can be eliminated from further assessment because it could not have any effect of a European Site.

The reason for this conclusion is as follows:

- The small scale and domestic nature of the development in a serviced urban area
- The distance from the nearest European site and lack of connections
- Taking into account the screening report/determination by Dublin City Council

I conclude, on the basis of objective information, that the proposed development would not have a likely significant effect on any European Site either alone or in combination with other plans or projects.

Likely significant effects are excluded and therefore Appropriate Assessment (under Section 177V of the Planning and Development Act 2000) is not required.

9.0 Water Framework Directive

The subject site is located c.0.7km to the east of Drimnagh Castle or Walkinstown Stream.

The proposed development comprises the demolition of the existing two-storey development and construction of a 2-7 storey mixed use development as set out in Section 2 of this report.

No water deterioration concerns were raised during the planning application or appeal.

I have assessed the proposed development and have considered the objectives as set out in Article 4 of the Water Framework Directive which seek to protect and, where necessary, restore surface & ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration. Having considered the nature, scale and location of the project, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any surface and/or groundwater water bodies either qualitatively or quantitatively.

The reason for this conclusion is as follows :

- The small scale and domestic nature of the development in a serviced urban area
- The distance from nearest water bodies and lack of hydrological connections

Conclusion

I conclude that on the basis of objective information, that the proposed development will not result in a risk of deterioration on any water body (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment.

10.0 Recommendation

I recommend that planning permission be refused for the reasons and considerations set out below.

11.0 Reasons and Considerations

1. Having regard to the restricted nature and prominent location of this corner site, it is considered that the proposed development by reason of its scale, massing and form of the development, its relationship to adjacent properties and the inadequate access and servicing arrangements, would represent overdevelopment of an infill site, would be visually obtrusive on the streetscape and would detract from the character and visual amenity of the area. The proposal would contravene Policy SC17 (Building Height) and the performance criteria set out in Table 3 of Appendix 3 of the Dublin City Development Plan 2022–2028 and overall would seriously injure the amenities of the area. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.
2. Having regard to the suburban location of the site and the non-provision of car parking for both residential and commercial uses alongside inadequate access and servicing arrangements, it is considered that the proposed development would be likely to give rise to unacceptable levels of overspill and haphazard parking on adjacent heavily trafficked roads and bus corridors, would seriously injure the amenities of the area and would endanger public safety by reason of traffic hazard and obstruction of pedestrians, bus services and other road users. It is considered that the proposed development would be contrary to Policy SMT27 of the 2022-2028 City Development Plan which

requires, inter alia, the provision of sustainable levels of car parking and car storage in residential schemes and the safeguarding of the residential parking component in mixed-use developments. 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.

Ciara McGuinness
Planning Inspector

25th September 2025

Appendix 1 - Form 1 - EIA Pre-Screening

Case Reference	ACP-322802-25
Proposed Development Summary	Demolition of the existing 2 storey commercial buildings and construction mixed use development, comprising a licensed supermarket and, 34 no. apartments and all other site works.
Development Address	8 & 8A, Saint Marys Road, Crumlin, Dublin 12
	In all cases check box /or leave blank
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (For the purposes of the Directive, "Project" means: - The execution of construction works or of other installations or schemes, - Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)	☒ Yes, it is a 'Project'. Proceed to Q2.
	☐ No, No further action required.
2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?	
☐ Yes, it is a Class specified in Part 1. EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.	
☒ No, it is not a Class specified in Part 1. Proceed to Q3	
3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?	
☐ No, the development is not of a Class Specified in Part 2, Schedule 5 or a prescribed	

type of proposed road development under Article 8 of the Roads Regulations, 1994. No Screening required.	
☐ Yes, the proposed development is of a Class and meets/exceeds the threshold. EIA is Mandatory. No Screening Required	
☒ Yes, the proposed development is of a Class but is sub-threshold. Preliminary examination required. (Form 2) OR If Schedule 7A information submitted proceed to Q4. (Form 3 Required)	State the Class and state the relevant threshold Class 10(b)(i) Construction of more than 500 dwelling units Sub Threshold - The proposed development is for 34 dwelling units. 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 Sub Threshold – The subject site has an area of 0.08ha

4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?	
Yes ☐	Screening Determination required (Complete Form 3)
No ☒	Pre-screening determination conclusion remains as above (Q1 to Q3)

Inspector: _____ Date: _____

Appendix 2 - Form 2 - EIA Preliminary Examination

Case Reference	
Proposed Development Summary	Demolition of the existing 2 storey commercial buildings and construction mixed use development, comprising a licensed supermarket and, 34 no. apartments and all other site works.
Development Address	Saint Marys Road, Crumlin, Dublin 12
This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.	
Characteristics of proposed development (In particular, the size, design, cumulation with existing/ proposed development, nature of demolition works, use of natural resources, production of waste, pollution and nuisance, risk of accidents/disasters and to human health).	Briefly comment on the key characteristics of the development, having regard to the criteria listed. The nature and size of the development (34 apartment units and ground floor commercial) is not exceptional in the context of the existing urban environment. The proposed development will not result in the productions of any significant waste, emissions or pollutants. Localised constructions impacts will be temporary. The development, by virtue of its type(residential), does not pose a risk of major accident and/or disaster.
Location of development (The environmental sensitivity of geographical areas likely to be affected by the development in particular existing and approved land use, abundance/capacity of natural resources, absorption capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas, landscapes, sites of historic, cultural or archaeological significance).	Briefly comment on the location of the development, having regard to the criteria listed The site is located in a urban area and is zoned for to protect, provide and improve residential amenities. Residential development is acceptable in principle in this zoning. The nearest European site is 0.7km to the north of the site. The development site is not within the vicinity of any European Sites. Given the nature of the development and the site/surroundings, it would not have the potential to significantly affect other significant environmental sensitivities in the area.
Types and characteristics of potential impacts (Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration, cumulative effects and opportunities for mitigation).	Having regard to the characteristics of the development and the sensitivity of its location, consider the potential for SIGNIFICANT effects, not just effects. There is no real likelihood of significant effects on the environment arising from the proposed development. There is no real likelihood of significant cumulative effects having regard to existing or permitted projects.

Conclusion	
Likelihood of Significant Effects	Conclusion in respect of EIA
There is no real likelihood of significant effects on the environment.	EIA is not required. ✓

Inspector: _____ Date: _____

DP/ADP: _____ Date: _____

(only where Schedule 7A information or EIAR required)