

DEPUTY PLANNING OFFICER

APPLICATION NO.	WEB2368/26
PROPOSAL	The development will consist of demolition of the existing derelict, single-storey, detached dwelling and all associated site clearance works.
LOCATION	91 Raheny Road, Raheny, Dublin 5
APPLICANT	Whitethorn Developments Limited
DATE LODGED	05-Jun-2026
ZONING	
APPLICATION TYPE	Permission

27/07/2026**Site Notice Inspection**

Site notice in place and in order 26th June 2026.

Description of Site and Surroundings

The subject site is located on the western side of Raheny Road and comprises an existing detached cottage. The application site is triangular in shape and is located at the junction of a local access road and the main Raheny Road. A row of single storey cottages bound the site to the northeast while a single storey bungalow (St. Michaels House) is located to the southwest. The boundaries of the site are characterised by shrubbery and a pedestrian access through a timber pedestrian gate to the south of the site. A vehicular access to a local City Council Depot and the vehicular access to 87 Raheny Road (St. Michaels House) converge with the local access road in close proximity to its junction with Raheny Road.

The application is conflicting in the information provided. There is an existing single-storey detached dwelling on site. The statutory notices refer to it as a '*derelict, single-storey, detached dwelling*' while the drawings indicate it as building with 5no. offices and a canteen. From a planning search on APAS – see below – there was no planning application permitted that authorised the change of use of the structure from residential to commercial. The planning authority would take it that the existing use of the building is residential, albeit, unoccupied / vacant.

The floor area of the building is stated as 84 sq.m. on the application form.

The drawings also indicate a collapsed roof on the structure.

It is currently unoccupied.

The stated area of the site is 0.045 hectares, and the gross floor space of the dwelling is stated as 84m².

In the covering letter submitted with the application the agent states the following:

The subject site is currently listed on the derelict sites register (Reference DS1562). The existing dwelling on the site is uninhabitable and in an advanced state of dereliction. The site in its current condition is increasingly attracting anti-social behaviour. A recent fire within the building has resulted in the collapse of a significant proportion of the pitched roof, rendering the building increasingly unsafe due to the instability of the remaining portion of the roof and its slate covering.

Proposed Development

The proposed development comprises the following:

- The development will consist of demolition of the existing derelict, single-storey, detached dwelling and all associated site clearance works.

Land-Use Zoning

The subject site is located on lands zoned Sustainable Residential Neighbourhoods – Z1 with a land use zoning objective '*To protect, provide and improve residential amenities*'.

Pre-Application Consultation

None indicated.

Relevant and/or Recent Planning History

A planning history search has been conducted using DCC's online planning portal, there have been previous valid planning application made on site.

<i>Relevant Planning Applications – on the proposed development site</i>	
<u>Reg. Ref</u>	<u>Decision/Description</u>
2803/21	Demolish the existing house and construct a 2 storey building consisting 4 No. 2 bed terraced houses along the eastern boundary of the site. 4 number on-site car parking spaces and 8 covered bicycle spaces will be provided, accessed from a new inward opening entrance onto the adjacent side road granted by planning consent 2893/17, 09 August 2017. Houses will be built in facing brick, with self-finished windows and a flat attenuated green roof system behind low brick parapets. Houses will be provided with private gardens, balconies at first floor level, private roof terraces and entrances with direct access to the car park. All houses will be accessed from the car park as well as directly from the inner public pavement which will be altered in liaison with DCC to provide level entrance thresholds. Decision: Permission Granted Subject to Conditions Construction Status: Not Built Permission Expiry Date: 23-Apr-2027
0179/21	SHEC: Demolition of existing house and construction of 4 no. 2 bed terraced houses. Decision: Grant Social Housing Exemption Cert Construction Status: Not Built
4557/18	Demolish the existing house and construct a part 2 part 4 storey building with 8 units consisting 5 no 3 bed terraced houses and 3 no studio apartments arranged along the eastern boundary of the site at 91 Raheny Road, Dublin, D05 F9W2. 4 number on-site car parking spaces and 14 covered bicycle spaces will be provided, accessed from a new inward opening entrance onto the side road adjacent to Raheny Road covered by Planning Consent 2893/17 09 August 2017. The uppermost floor of the 4-storey section will be set back on both sides to provide small amenity terraces. The 5 terraced houses will be provided with private gardens with direct access to the car park. The houses will be accessed directly both from the car park and the rear public pavement which will be stepped and regraded to provide level entrance thresholds. Decision: Permission Refused Reason: 1. Having regard to the Z1 residential zoning, as set out in Dublin City Development Plan 2016-2022 for the area, to the layout, scale and design of the proposed development and to its proximity to existing residential development, it is considered that the proposed development constitutes the overdevelopment of the site and would have an adverse impact on the existing amenities of residential development by reason of an overlooking and overbearing impact. Furthermore, it is considered that the proposed development, in terms of bulk, mass and form, does not complement the character of the area, would appear overbearing and would have a negative visual impact on Raheny Road and also would appear visually incongruous in this respect. It is considered, therefore, that the proposed development would seriously injure the amenities of adjoining property, would depreciate the value of property in the vicinity and would be contrary to the proper planning and sustainable development of the area. 2. Having regard to floor areas, the provision of storage space, the poor aspect and outlook of the units, the quantity and quality of private open space, the provision of pedestrian and vehicular access and the provision and location of car parking and cycle parking, it is considered that the proposal would provide a substandard level of accommodation, which does not meet the required standards and would result in an unacceptably low level of residential amenity for future occupants. The

	proposed development would therefore, by itself and by the precedent it would set for other development, be contrary the Ministerial Guidelines - Sustainable Urban Housing: Design Standards for New Apartments –Guidelines for Planning Authorities, 2018, be contrary to the provisions of the Dublin City Development Plan 2016-2022 and be contrary to the proper planning and sustainable development of the area.
2893/17	Widen existing single width pedestrian gateway at south end of site. Decision: Permission Granted Subject to Conditions
0712/99	Retention of consulting room. Decision: Permission Granted Subject to Conditions
3208/98	2 storey extension to side of house, new entrance and boundary wall. Decision: Permission Refused The proposed extension would allow for the expansion of the existing dormer bungalow to a five bedroom part two storey house. The scale and extent of this proposal represent an overdevelopment of this site and is such is contrary to the provisions of the 1991 Dublin City Plan in relation to residential development. The proposed extension is creating a development which would require provision of private open space of 180 sq. metres. The open space available is approx. 36 sq. metres and is bounded by the public road. This is not satisfactory to meet the Development Plan Standards.

Relevant Enforcement History

None for subject site

Consultations

Internal Consultees:

- **Drainage Division:** Report dated 24/06/2026 - No objection subject to standard conditions.

External Consultees:

- **Uisce Eireann:** No report received.

Submissions

None received

Relevant Policies, Objectives and Standards Dublin City Development Plan 2022 – 2028

Chapter 3 - Climate Action

- 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

Chapter 14: Land-Use Zoning

- Section 14.3 Permissible, Non-Permissible Uses and Unzoned Lands
- Section 14.7.1 Sustainable Residential Neighbourhoods – Zone Z1

Appendix 18: Ancillary Residential Accommodation

- Section 9.0 Demolition and Replacement Dwellings

The demolition and replacement of dwellings will be discouraged for sustainability reasons. Applications will be considered on a case by-case basis. Dublin City Council will encourage deep retro-fit of structurally sound, habitable dwellings in good condition as opposed to demolition and replacement unless a strong justification in respect of the latter has been put forward by the applicant such as that the dwelling is uninhabitable and unsuitable for reuse or that its demolition is necessary to facilitate the comprehensive redevelopment of a site.

Demolition of an existing house in single occupancy and replacement with multiple new build units will only be considered where it can be demonstrated that a high level of amenity is provided and that there is a strong justification to alter the setting and character of the area.

Chapter 15: Development Standards

- Section 15.7.1 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 in accordance with Policy CA5, CA6 and CA7. 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 as well as the additional use of resources and energy arising from new construction relative to the reuse of existing structures.

Existing building materials should be incorporated and utilised in the new design proposals where feasible and a clear strategy for the reuse and disposal of the materials should be included where demolition is proposed.

Planning Assessment

Having reviewed the documentation submitted, visited the site and having regard to the relevant policies and guidance, it is considered that the main issues for assessment relate to:

- Land-Use Zoning and the Principle of Proposed Development
- Evaluation of Demolition
- AA and EIA

Land-Use Zoning and Principle of Proposed Development

The proposed development consists of the following:

- The development will consist of demolition of the existing derelict, single-storey, detached dwelling and all associated site clearance works

As per Section 14.7.1 of the development plan, the subject site is located on lands zoned Sustainable Residential Neighbourhoods – Z1 with a land use zoning objective 'To protect, provide and improve residential amenities'. The proposed development is permissible in this zoning. A permissible use is one which is generally acceptable in the relevant zone, but which is subject to normal planning considerations, including the policies and objectives outlined in the development plan.

Evaluation of Demolition

The proposed development comprises the demolition and removal of the existing single-storey dwelling at 91 Raheny Road, Dublin 5.

Appendix 18, Section 9 and Chapter 15, Section 15.7.1 of the Dublin City Development Plan state that the demolition of existing buildings is generally discouraged, and the retrofitting and re-use of the existing building is encouraged.

The cover letter with the application has provided further details relating to the application site and reasoning for the proposed demolition, stating:

- The subject site is currently listed on the derelict sites register (Reference DS1562). The existing dwelling on the site is uninhabitable and in an advanced state of dereliction. The site in its current condition is increasingly attracting antisocial behaviour. A recent fire within the building has resulted in the collapse of a significant proportion of the pitched roof, rendering the building increasingly unsafe due to the instability of the remaining portion of the roof and its slate covering.
- A separate planning application for development of the site is intended in the near term. The current planning application is for removal of the existing derelict dwelling and clearance of the site, and is intended to facilitate works to make the site safe, secure and more presentable in the interest of public safety.

As stated in Chapter 15, Section 15.7.1:

- *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 as well as the additional use of resources and energy arising from new construction relative to the reuse of existing structures.*
- *Existing building materials should be incorporated and utilised in the new design proposals where feasible and a clear strategy for the reuse and disposal of the materials should be included where demolition is proposed.*

It is noted that the applicant has not included a full demolition justification report in this submission.

The demolition of the existing dwelling would result in a vacant residentially zoned site for an undetermined period of time. It is considered that the creation of a vacant site in this residential area would significantly injure the visual and residential amenities of the properties in the area, and therefore contrary to the site's Z1 zoning objective 'To protect, provide and improve residential amenities.'

Appropriate Assessment Screening Determination

The subject site is located circa 1.34km from the North Dublin Bay SAC. The proposed development is located within an established residential area and comprises alterations to a house. Having regard to:

- The small scale and nature of the development
- The location of the development in a serviced urban area so that any construction surface water runoff will be managed via the existing drainage system
- The consequent absence of a pathway to the European sites

It is considered that the proposed development would not be likely to have a significant effect individually, or in combination with other plans and projects, on the Natura 2000 network and appropriate assessment is not therefore required.

Environmental Impact Assessment Pre-Screening

Having regard to the nature and scale of the proposed development and the distance of the site from nearby sensitive receptors, there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore be excluded at preliminary examination and a screening determination is not required.

Conclusion

Having regard to the provisions of the Dublin City Development Plan 2022-2028 it is considered that the demolition of the existing dwelling would seriously injure the visual and residential amenities of the area. The proposed development would therefore contravene the relevant policies and objectives of the Dublin City Development Plan 2022-2028.

Recommendation

It is recommended that Permission be Refused for the following reasons:

The proposed demolition and loss of a dwelling in the absence of an accompanying proposal for redevelopment of the application site would result in a vacant residentially zoned site for an undetermined period of time. It is considered that the presence of a vacant site in this residential area would seriously injure the residential amenities of properties in the vicinity and would have a negative impact on visual amenity in the area. The proposal would therefore be contrary to the site's Z1 zoning objective 'To protect, provide and improve residential amenities' and the vision for residential development in the city as set out in Section 14.7.1 of the Dublin City Development Plan 2022 - 2028, would depreciate the value of property in the vicinity and would not be in the interest of the proper planning and sustainable development of the area