



An
Bord
Pleanála

S. 4(1) of Planning and Development (Housing) and Residential Tenancies Act 2016

Inspector's Report ABP-300559-18

Strategic Housing Development

Demolition of existing pre-fab classroom structure, construction of 536 no. units (104 no. houses and 432 no. apartments), widening and realignment of an existing vehicular access onto Sybil Hill Road to facilitate the proposed access road with footpaths and on-road cycle tracks from Sybil Hill Road and Sybil Hill House (Protected Structure) and St. Paul's College incorporating new accesses to Sybil Hill House and St. Paul's College and associated site works.

Location

Lands east of St. Paul's College, Sybil Hill Road, Raheny, Dublin 5.

Planning Authority

Dublin City Council

Applicant	Crekav Trading GP Ltd
Prescribed Bodies	<p>Irish Water</p> <p>National Transport Authority</p> <p>The Minister for Culture, Heritage and the Gaeltacht</p> <p>The Heritage Council</p> <p>An Taisce</p> <p>An Comhairle Ealaíonn</p> <p>Fáilte Ireland</p> <p>Irish Water</p> <p>Transport Infrastructure Ireland</p> <p>Childcare Committee</p>
Observer(s)	1102 submissions- See Appendix 1
Date of Site Inspection	<p>25th February 2018</p> <p>20th March 2018</p>
Inspector	Lorraine Dockery

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1.0 Introduction

This is an assessment of a proposed strategic housing development submitted to An Bord Pleanála under section 4(1) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

2.0 Site Location and Description

- 2.1. The subject site is located approximately 5km from Dublin city centre, in the established neighbourhood of Raheny, Dublin 5. It has a stated area of 6.4 hectares, is roughly rectangular in shape, aside from a narrow strip that runs westward to provide for access onto Sybil Hill Road (R808). The site forms part of lands previously associated with St. Paul's College, a boys' secondary school, and the college structures are located to the west of the site. An existing residential development, known as 'The Meadows' is also located to the west of the site, as is Sybil Hill House, a Protected Structure. The site is bound to the east, south and north by St. Anne's Park.
- 2.2. It has most recently been used as playing fields, is under grass and much of the boundary with St. Anne's Park consists of a steel fence, finished in a dark green colour. Along the northern boundary of the site is the remaining part of what is stated to be part of the walled garden of Maryville House, now demolished. The site slopes from a high point of 27.66m OD at the north-eastern boundary to a level of 21.43m OD at the south-eastern boundary. There are a number of mature trees on site and it is well screened on all sides. A high wall forms the boundary between it and 'The Meadows' and a line of deciduous trees are located near this boundary. Along all three sides between the park and the application site is a belt of mature trees.

3.0 Proposed Strategic Housing Development

- 3.1. The proposed development, as per the submitted public notices, comprises the demolition of an existing pre-fab classroom structure, construction of 536 no. units (104 no. houses and 432 no. apartments), widening and realignment of an existing vehicular access onto Sybil Hill Road to facilitate the proposed access road with

footpaths and on-road cycle tracks from Sybil Hill Road and Sybil Hill House (Protected Structure) and St. Paul's College incorporating new accesses to Sybil Hill House and St. Paul's College and associated site works. The applicants are seeking a ten-year permission.

- 3.2. The proposed layout comprises two distinct zones, the apartment element is located to the north while the housing element is located to the south. The zones are divided by an access roadway, which provides access from the site onto Sybil Hill Road. The northern apartment zone, containing six apartment blocks which range in height from 5-8 storeys, aims to create an extension of the parkland setting with each block surrounded by extensive public open space. The southern housing zone is more rigid in layout comprising four distinct courtyard blocks.
- 3.3. The proposed works for demolition comprise the school pre-fab classrooms, with a stated area of 694m², together with the existing piers at Sybil Hill Road entrance.
- 3.4. The following tables set out some of the key elements of the proposed scheme:

Table 1: Development Standards

Density	88 units/ha
Plot Ratio	0.88
Indicative Site Coverage	34%

Table 2: Unit Mix

Apartments					
Block	1 bed	2 bed	3 bed	4 bed	Total
1	48	92	3	-	143
2	15	39	9	-	63
3	9	24	6	-	39
4	15	39	9	-	63
5	9	24	6	-	39
6	59	26	-	-	85
Total Apt	155	244	33	-	432
Houses					
	-	-	96	8	
Total Houses	-	-	96	8	104
TOTAL	155	244	129	8	536

Table 3: Building Height

Block	Storeys	Parapet Height mOSD
1	5-8	39-47.65
2	8	47.65
3	5	39.0
4	8	47.65
5	5	39.0
6	5	39.0
Houses	3	33.517-33.963

Table 4: Unit Sizes

Apartment	
1 bed	49-59m ²
2 bed	77-82m ²
3 bed	99-104m ²
Houses	
Type A	121.4m ²
Type B	116m ²
Type C	152.9m ²
Type D	116m ²

Table 5: Part V Provision

Requirement: 54 units	Provision: 54 units
	39 units- Block A (9 x 1 bed, 24 x 2 bed, 6 x 3 bed)
	15 units- To be allocated across Blocks 2, 4 and 5- exact units not specified

Table 6: Car Parking Provision (see Table 5.1 of TIA)

Basement	1 space per apt (Incl 22 disabled spaces & 2 electric spaces)	434	434
Surface	1.5 space per house 31 visitor spaces (inc. 2 disabled) 2 GoCar spaces 2 electric spaces 9 assigned (crèche & drop-off)	156 31 2 2 9	200
Total			634

Table 7: Bicycle Parking

Basement- apartments	864
Surface- visitor	20
Total	884

Table 8: Community Rooms

Basement – Block 1	Stated Areas
Meeting Room	25m ²
Games Room	29 m ²
Cinema	42m ²
Office	12.5m ²
Store	38m ²
Store	4m ²
Total Basement-Block 1	150.5m² (stated total of 186m² incl. of circulation areas & WC)
Ground Floor- Block 1	
Wi-fi Zone	47.5m ²
Hot Desk Area	61.5m ²
Community Room Terrace	123m ²
Community Meeting/Lounge	93m ²
Break-out Area	56m ²
Community Kitchen/Dining/Storage Area	58.5m ²
Entrance/concierge/office	137.5m ²
Total Ground Floor-Block 1	594.5m²
Ground Floor-Block 6	
Lobby/gym/changing/relaxation	251.5
Total Ground Floor-Block 6	251.5
TOTAL	1032m²

- 3.5. A crèche facility of stated floor area 260 square metres, with capacity for approximately 37 children is proposed, together with an external space of 300 m². This is located within Block 6, in the north-eastern portion of the site.
- 3.6. In term of site services, a new water connection to the public mains is proposed, together with a new connection to the public sewer. An Irish Water Pre-Connection Enquiry in relation to water and wastewater connections has been submitted, as required. It states that subject to connecting downstream to an identified 650mm constraint in the 1350mm wastewater main, the proposed wastewater connection to the Irish Water network can be facilitated.
- 3.7. A letter from Orsigny, property holding company of the Vincentians (dated 20/12/17) giving consent to Crekav Trading GP Ltd to lodge a planning application with ABP incorporating lands in its trust and ownership is attached to the file, with an associated map. In addition, a letter from the Parks and Landscape Services, Dublin City Council (dated 19/12/17) is attached giving consent to this planning application to Crekav Trading GP Ltd, as limited to the areas highlighted in red on associated map for the purpose of a proposed surface water drain.
- 3.8. A letter from Department of Education and Skills (dated 02/08/17) is attached to the file which states that with reference to the development of lands at St. Paul's Secondary School, the Department has carried out an exercise of the future figures and in consultation with a number of sections in the Department are satisfied that the development at St. Paul's will not adversely affect their future projections. When considering the educational implications, it is stated that they included the increase demand due to the development at St. Paul's, both at primary and post primary level. Based on this, the Department has no objections to this development.
- 3.9. The project will be constructed in three phases over 36 months, with the phasing as follows:
1. Site service infrastructure, basement excavation and construction of 104 no houses
 2. Construction of Apartment Blocks 4, 5 and 6 and associated works
 3. Construction of Apartment Blocks 1, 2 and 3 and associated work

4.0 Planning History

Development Site

3777/17	Application for demolition of three school structures and construction of sports hall, 2 all-weather playing pitches and associated site works. Further Information requested by the Planning Authority
4185/15	Application WITHDRAWN for 381 residential units, 2 all-weather pitches and ancillary site works
2381/01	Permission GRANTED for floodlighting, changing room, upgrade works and ancillary site works
2948/01	Permission GRANTED for new railings at St. Paul's College, including sides of sports fields

Nearby lands

PL29N.246250	Permission GRANTED for 76 residential units and ancillary works at Sybil Hill Road (north of subject site)
PL29N.238232	Permission REFUSED for demolition of 3 no. habitable dwellings and construction of 98 no. dwellings, crèche, café and all associated site works at Sybil Hill Road

5.0 Section 5 Pre Application Consultation

- 5.1. A Section 5 pre application consultation took place at the offices of An Bord Pleanála on the 18th October 2017. Representatives of the prospective applicant, the planning authority and An Bord Pleanála were in attendance. Following consideration of the issues raised during the consultation process, and having regard to the opinion of the planning authority, An Bord Pleanála was of the opinion that the documentation submitted required further consideration and amendment to constitute a reasonable

basis for an application for strategic housing development to An Bord Pleanála. The applicant was advised that further consideration of the documents as they relate to the following issues was required:

Z15 Masterplan

1. Replacement of the existing sports facilities at the site as provided for under the Z15 zoning objective. This consideration and justification should have regard to the detailed Z15 zoning provisions as set out in the Dublin City Development Plan 2016-2022.

Residential Amenities

2. Potential impacts on the residential and visual amenities of properties within The Meadows. This consideration and justification should have regard to the provisions of the Dublin City Development Plan 2016-2022.

Impacts on St. Anne's Park and Sybil Hill House

3. Potential impacts on the visual amenities of St. Anne's Park and on the setting of Sybil Hill House, a Protected Structure.

Car Parking

4. Justification for the proposed quantum of car parking in view of (i) the proximity of the site to Harmonstown Dart station and the Howth Road QBC and (ii) the location of the site within Development Plan parking zone 2.

Appropriate Assessment

5. Potential effects on adjoining designated sites with regard to their conservation objectives, specifically potential effects associated with the on the usage of the development site by Brent Geese for winter feeding.

The applicants were advised that the further consideration of the issues raised above may require an amendment to the documents and/or design proposals submitted.

- 5.2. Furthermore, the prospective applicant was advised that the following specific information should be submitted with any application for permission:
1. Planning report to address consistency with the Z15 zoning objective, specifically use of the existing sports facilities at the site by community groups, use of the proposed new sports facilities at St. Paul's College and the availability of other sports/community facilities in the wider area
 2. A site layout plan, cross sections, landscaping details, visual impact analysis and detailed shadow analysis to indicate potential impacts on the residential and visual amenities of adjacent properties within The Meadows.
 3. Photomontages, cross sections and landscaping details to indicate potential impacts on St. Anne's Park and on the setting of Sybil Hill House Protected Structure.
 4. Planning report providing a detailed rationale for the proposed car parking provision with regard to the location of the site within 500m of Harmonstown Dart Station and Howth Road bus facilities, to be supplemented by a Transportation Impact Assessment and a Mobility Management Plan.
 5. Natura Impact Statement to assess potential effects on relevant designated sites with regard to their conservation objectives, including potential effects associated with the usage of the development site by Brent Geese for winter feeding.

Applicant's Statement

A statement of response to the Pre-Application Consultation Opinion was submitted with the application, as provided for under section 8(1)(iv) of the Act of 2016. This statement provides a response to each of the five issues raised in the Opinion- Z15 Masterplan, residential amenities, impacts on St. Anne's Park and Sybil Hill House, car parking and appropriate assessment.

Z15 Masterplan- A Masterplan has been submitted with the application. It is stated that the proposed development is generally consistent with the Z15 zoning objective, specifically in relation to the preservation and enhancement of the use of the retained institutional lands by community groups, the use of the new sports facilities

at St. Paul's College and the availability of other sports/community facilities in the wider area, which is a well-resourced, established community.

Residential Amenities- detailed site sections showing relationship between Block A and The Meadows prepared, as was a Shadow Study. Analysis shows that there will be very limited shadow impact on adjoining gardens and all parameters are well within established guidelines

Impacts on St. Anne's Park and Sybil Hill House- Conservation Impact Assessment prepared. In relation to road access, assessment considers that this would have little impact on the character or setting of the Protected Structure. Landscape masterplan recommends a belt of small trees be planted on northern side of access road to improve screening. In relation to potential impact of proposed buildings, it is not anticipated that the presence of Block 1 would have any significant impact on character of Protected Structure given the orientation and aspect of the house and the separation distances involved. Assessment also considers that the proposal will not have significant impact on character of St. Anne's Park.

Car parking- car parking is consistent with the City Development Plan having regard to the nature and location of the different elements of the proposed development within the subject site. A total of 634 spaces are proposed.

Appropriate Assessment- Conclusions include that the Brent Geese wintering population is widely distributed around the coast of Ireland; North Bull Island is an important resource for Brent Geese in Dublin Bay; long-term and medium-term data illustrate that Brent Geese are thriving in Dublin Bay with their numbers up between 2015-2016 and 2016-2017 winter bird surveys and there is variation, opportunism and adaption to new suitable locations as they become available. The loss of St. Paul's foraging lands will have no significant impact in the foraging range or the number of Brent Geese arriving at the North Bull Island SPA.

6.0 Relevant Planning Policy

6.1. National Planning Policy

The following list of section 28 Ministerial Guidelines are considered to be of relevance to the proposed development. Specific policies and objectives are referenced within the assessment where appropriate.

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (including the associated Urban Design Manual)
- Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities
- Design Manual for Urban Roads and Streets
- The Planning System and Flood Risk Management (including the associated Technical Appendices)
- Childcare Facilities – Guidelines for Planning Authorities
- Architectural Heritage Protection

6.2. Local Planning Policy

The Dublin City Development Plan 2016-2022 is the operative City Development Plan.

Zoning:

Objective Z15 Institutional & Community which seeks to 'protect and provide for institutional and community uses and to ensure that existing amenities are protected'. Residential development is 'open for consideration' under this zoning objective.

There is a requirement for proposals on Z15 zoned lands to be accompanied by a masterplan that sets out a clear vision for the zoned lands, to provide for the identification of 25% of the lands for open space and/or community facilities, in lieu of the 10-20% of public open space normally provided for in development plan standards (does not apply if the footprint of the existing buildings > 50% of the total site area of the institutional lands).

The following standards also apply within Z15:

- Plot ratio 0.5 – 2.5
- Indicative site coverage 50%

Lands within St. Anne's Park, located to the immediate north, east and south of the subject site are zoned 'Objective Z9' which seeks to 'preserve, provide and improve recreational amenity and open space and green works'.

Section 16.7 Building Height

- Low Rise/Outer City- Maximum Height 16m/5 storeys for residential
- Within 500m of a DART station- Maximum height 24m/8 storeys for residential

The north-western portion of the site is within 500 metres of Harmonstown DART Station (as the crow flies).

Map J- Strategic Transport and Parking Areas

- Zone 2- the development is in close proximity to good public transport links. Car parking provision is restricted in Zone 2 on grounds of good public transport links
- Residential car parking standard of 1 space /dwelling. No standard for childcare facility. Cycle parking 1 per unit for all zones.

Sybil Hill House is designated as a Protected Structure (Ref. 7910) in the 'Record of Protected Structures'.

St Anne's Park is designated as a Conservation Area

Dublin City Parks Strategy 2017- highlights St. Anne's Park as a historic Flagship Park

Dublin Bay has recently been awarded a UNESCO Biosphere designation, which aims to promote biodiversity management at ecosystem level.

It is stated by the applicant that the gardens of Sybil Hill House (DU-50-O-203374) and St. Ann's (DU-50-O-217373) are listed in the National Inventory of Architectural Heritage (NIAH)- this element of the Inventory is unpublished as yet.

6.3. Applicant's Statement of Consistency

A Statement of Consistency with local and national policy has been submitted with the application, as per Section 8(1)(iv) of the Act of 2016.

7.0 Third Party Submissions

7.1. A large volume of third party submissions were received, 1102 in total. I note that two main pro-forma/objection templates were used (see Objection Template 1 and 2 below). Other pro-forma or template objections were used, but were generally from smaller groups of between 3 and 5 objectors. In addition to this, individual submissions that represented a mix of templates or no template were received. A number of sporting bodies in the vicinity made submissions, as did some public representatives. Other bodies, including a Joint Submission by Birdwatch Ireland and the Irish Brent Goose Research Group, also made submissions. A petition against the development, with a stated 7000 names was also received. A list of all submissions received is contained within Appendix 1 of this report.

Objection Template 1 covered:

- Conflicts with Z15 Zoning
- Loss of open space/active recreational grounds (in-combination losses, including previous loss of swimming pool)
- Loss of habitats for Birds/SPA (AA issues/Habitats Directive)
- Impact on Biosphere
- Traffic & Transportation: lack of carrying capacity of local road network, lack of capacity on bus network/services, greater than 500m from Dart station (inaccurate distances indicated)
- Height/Visual Impact vis a vis :
 - St. Anne's Park
 - Protected Structure (Sybil Hill House)
 - surrounding two-storey housing

Objection Template 2 covered:

In addition to the above, Objection Template 2 also expressed concerns in respect of procedural issues

- Privatisation of a public asset;
- By-pass/subversion of correct planning process (re zoning and application)
– note planning history 3777/17
- Loss of sporting amenity
- Loss of educational amenity/facility
- Conflicts with Z15 Zoning
- Impact on Naniken Stream /SUDs/Flooding
- Brent Geese, black tailed godwit
- CGIs – don't accurately reflect nature and scale of development
- Impact on Sybill Hill House
- Development will not assist in addressing current housing shortages
- Alternative lands available for such housing (in particular Z1 lands)

In addition to the above other issues raised include:

- Loss of habitat and light pollution impacting on bats
- Loss of habitat for Curlews, oyster catchers (no details)
- Question the adequacy of mitigation measures
- Lack of crèche places (as well as lack of primary and secondary school places)
- Compliance with required masterplan
- Material contravention of zoning objective
- St Anne's Park is a designated 'quiet area' (by Minister Hogan in 2013)
- Impact on tourism and business as a result of loss of St. Anne's Park
- Water pressure issues will worsen as a result of the proposed development
- Noise
- Light pollution
- Loss of trees and associated impact on climate/air quality (oxygen levels)
- Integrity of information and full disclosure by applicant

- ECJ Reference cases including, inter alia, C-374/98, C-98/03, C-418/04 and C-127/02, 418/04 and 258/11 (incorrectly referred to as 268/11 in one of the submissions received)
- Safety of senior citizens (as a result of road traffic)
- Urban Greenery and mental health (climate for health and WHO referenced) - limited details (NH230)
- Part V provision on site
- Parking provision inadequate
- Pedestrian access to park
- No provision for expansion of the school
- Inappropriate to make decision on this case until such time as decision made on 3777/17
- Impacts on visual and residential amenity of The Meadows
- Impacts on Millennium Arboretum and Rose Garden
- Design of shared courtyard area to proposed housing
- Absence of public consultation
- Strain on local services
- Dominate skyline/over-intensification of use
- Setting of undesirable precedent for development on Z15 lands
- Inadequacy of proposed facilities on adjoining lands (DCC Ref. 3777/17)
- Existing shortage of pitches in St. Anne's Park

8.0 Planning Authority Submission

- 8.1. In compliance with section 8(5)(a) of the 2016 Act the planning authority for the area in which the proposed development is located, Dublin City Council, submitted a report of its Chief Executive Officer in relation to the proposal. This was received by An Bord Pleanála on 26th February 2018. The report may be summarised as follows:

Information Submitted by the Planning Authority

Details were submitted in relation to the site description, proposal, pre-application consultations, planning history, interdepartmental reports and consultees. A summary of representations received was outlined.

Summary of Inter-Departmental Reports

Drainage Division: No objections, subject to conditions

Roads and Traffic Planning Division: No objections, subject to conditions

Parks and Landscape Services: Significant concerns raised; conditions attached

City Archaeologist Report: No objection, subject to conditions

Housing Department: Agreement in principle in relation to Part V has been reached

The main issues raised in the assessment were as follows:

In terms of the institutional zoning objective, the details contained within the masterplan are noted with regard to the school expansion. It is stated that the proposed development could have been more generous in allowing future expansion of the existing school having regard to the size of the institutional lands. The report highlights a lack of details contained within the masterplan in relation to timetables for community use of the school playing fields on a pitch by pitch, club by club basis. The applicant has not demonstrated to the satisfaction of the planning authority that 2 no. all-weather playing pitches proposed under Plan No. 3777/17 will be able to cater for the existing use of 7 playing pitches or any necessary expansion of such uses. It is considered that the proposed residential development is not located on institutional lands which are surplus to requirements as it has not been adequately demonstrated that the proposal secures the retention of the main community uses on the lands including space for any necessary expansion of such uses. The Planning Authority calculate that the proposal provides 18.7% public open space, which is a significant shortfall in terms of meeting the 25% requirement of the zoning objective. They consider that while P1 East will function as genuine public open space, the remainder of the spaces function more as communal open space/landscape buffer zones. It is considered that the proposed community facilities will serve primarily the proposed development and do not constitute community facilities that would compensate for the shortfall of public open space. In this context, it is considered that the proposed development does not comply with the Z15 zoning objective requirement in terms of 25% public open space/community facilities. Notwithstanding this, a condition is attached if the Bord towards a grant of

permission relating to the payment of a contribution in lieu of public open space. It is considered that the masterplan could have made a more significant contribution to the creation of linkages with the extensive strategic green network in the area. The current SHD proposal taken together with the MKN development would result in the primary use of these lands changing from institutional to residential use.

In terms of biodiversity, the operative Dublin City Development Plan recognises that Dublin Bay contains three internally recognised biodiversity designations and that it has recently been awarded a UNESCO biosphere designation. The following is noted in the Parks and Landscape Report of the planning authority:

- St. Paul's can be regarded as the most important ex-situ feeding site for Brent Geese in Dublin based on highest peak counts of Brent Geese, regularity of use, geographical location in relation to North Bull Island, its size and the relative lack of disturbance
- Submitted NIS concludes that the impacts of the proposal will be mitigated by the availability of a network of alternative inland feeding sites (124 known sites and 35 potential sites) which have capacity to absorb the loss of the St. Paul's site, in combination with the loss of 12 other identified sites- states that this network of sites is subject to protective policies and objectives as outlined in Appendix F of the report
- If mitigation measures are insufficient, or are not actually practicable and achievable to avoid the risk entirely, then, in the light of a negative assessment, the plan or project may not proceed
- No indication that the applicant has control over the management of the sites within the proposed network of alternative inland feeding sites, which comprises lands in both public and private ownership, with varying land-use zonings and located in different local authority areas
- Noted that 30 of the sites (as of July 2017) have planning permissions granted or pending and it is conceivable in the context of the current economic

climate, that this number is likely to rise, increasing developmental pressure on the network

- Contradictory to suggest that the policies and objectives as outlined in Appendix F of the report can ensure the protection of the network of alternative feeding sites for Brent Geese, but not the current SHD application site that is also subject to the same policies and objectives
- Proposed development is likely to result in significant impacts- in this regard, the proposed mitigation, namely the capacity of the network of alternative feeding sites to absorb the loss of St. Paul's is questionable in terms of its achievability
- In such an event, the remaining available options, under the relevant regulations, are to identify and provide suitable compensatory habitat or not proceed with the development

Taking the above into account and applying the precautionary principle, the planning authority is not satisfied that the proposed development would maintain the favourable conservation condition of Light-bellied Brent Geese and would not adversely affect the integrity of the North Bull Island Special Protection Area.

In terms of design and impacts on amenities, the private open space to proposed dwelling in terms of private/communal gardens is considered reasonable to comply with Development Plan standards. In terms of car parking, considers that number of on-street spaces should be reduced to 1 space per unit. Unit mix is considered acceptable, design of proposal would generally provide for a high quality of residential development. In terms of building height it is noted that Block 4 is substantially outside of the 500m boundary to DART station transport hub and should be reduced to five storeys in height to comply with Development Plan standards. On balance, it is considered that the proposed height, mass and scale is acceptable and would not be visually obtrusive and would not significantly detract from the amenities or setting of the adjacent property including St. Anne's Park or the Protected Structure in terms of overlooking, overshadowing or overbearing. An

example of Herbert Park where substantial apartment development is successfully located close to an established public park is noted. In terms of potential access points between the development site and St. Anne's Park, it is unclear what the proposed access arrangements are in relation to control of this access, potential opening hours etc. having regard to the previous case whereby access from the development at Mount Saint Anne's to the adjacent Luas station was restricted to residents only, it would be appropriate to apply a condition promoting permeability by avoiding the potential for each access to become privatised with resident only access.

In terms of other issues/third party observations, the following is noted

- Proposal appears to have complied with SHD requirements and applicants has sufficient legal interests in land to make application
- Proposal does not constitute project splitting as two sites are in separate ownership, an EIAR and NIS has been submitted under this current application; EIAR has considered cumulative impacts of both proposals
- Submitted EIAR indicates that predicted light levels along southern and eastern boundaries, where high level of bat foraging was recorded are less than 1 lux and interactions on noise are neutral subject to appropriate mitigation
- Drainage Division of planning authority raised no objection subject to conditions
- Roads and Traffic Planning Division of planning authority raised no objections, subject to conditions

In conclusion, it is noted that:

- Proposal does not comply with Z15 Institutional Land use zoning objective insofar as it has not been demonstrated to their satisfaction that the

community uses established on site prior to the lands being sold for development are being fully accommodated, nor has sufficient open space been retained on site to provide 25% public open space in a manner which maintains the essential open character of the lands as outlined in the zoning objective

- Not been demonstrated to the satisfaction of the planning authority that the St. Paul's lands can be developed without having an adverse impact on Brent Geese due to the loss of habitat and the failure to provide compensatory habitat given that the St. Paul's lands constitute the most important ex-situ site in the Dublin area for this protected species
- In principle, subject to the satisfactory resolution of the zoning objective and biodiversity issues, the Planning Authority is not opposed to the delivery of a high quality residential development on part of the St. Paul's lands. Depending on establishing more accurately the level of community use, this may be achieved by providing additional playing pitches on the lands currently allocated to the construction of the 104 no. houses in the current SHD application. It may be appropriate to design such facilities as drained grass pitches that would meet both the community recreation needs and assist in retaining suitable habitat for Brent Geese, provided it can be demonstrated that the raised level of adjacent activity would not deter the use of the site. Additional compensatory habitat may also be required.
- Opinion of Planning Authority that it would be preferable to position higher building towards the centre of the site subject to careful design to ensure the buildings would not detract from sensitive views along the avenue within St. Anne's Park. The proposed alternative layout as outlined above, together with a focus on providing most if not all public open space in the NW corner of the site would reduce the transition in scale and the potential impact on the amenities and setting of Sybil Hill House, The Meadows housing estate and St. Anne's Park.
- Refusal Recommended

- Conditions attached

9.0 Prescribed Bodies

9.1. The applicant was required to notify the following prescribed bodies prior to making the application:

- The Minister for Culture, Heritage and the Gaeltacht:
- The Heritage Council:
- An Taisce
- An Comhairle Ealaíonn:
- Fáilte Ireland:
- Irish Water:
- Transport Infrastructure Ireland:
- National Transport Authority:
- Relevant Childcare Committee:

Five bodies have responded and the following is a brief summary of the points raised. Reference to more pertinent issues are made within the main assessment.

The Minister for Culture, Heritage and the Gaeltacht:

Archaeology:

No objections, subject to condition

Architectural Heritage:

Further Information requested in relation to provision of a full impact assessment of the proposed impact of development in the historical context and should include overall understanding of cultural landscape of St. Anne's Park in relation to subject site; visual and architectural impact assessment; selected views and justification of transition from local scale to monolithic block.

Nature Conservation:

Main concern is ex-situ impacts on Light-bellied Brent Geese, a listed species of Special Conservation Interest for a number of SPAs designated under the Birds Directive. The SPAs where Brent Geese is a listed interests and in terms of proximity to St. Paul's College, it is noted that North Bull Island SPA, Baldoyle Bay

SPA and River Tolka Estuary SPA are of most relevance. The NIS, through direct survey and a review of previous data collected, consider the grasslands of St. Paul's College to be of major importance for Brent Geese.

In order to conclude an Appropriate Assessment on the proposed development, which, if granted, would reduce both the quantity and quality of the feeding resources for Brent Geese at St. Paul's to a significant degree, An Bord Pleanála would need to consider the following:

- The Brent Geese population listed for North Dublin Bay SPA is now reliant, to a large degree, on the availability of suitable grassland feeding resources within the Dublin area outside of the SPA network
- In order for a particular area to be a potentially suitable feeding resource for Brent Geese, the overall size of the grassland site, the degree of fragmentation of the grassland resource caused by the presence of internal boundaries/vegetation, the quality and management of the grassland sward, relatively low levels of anthropogenic disturbance and its proximity to the SPA and other alternative feeding areas all need to be at suitable levels
- The extent of potentially suitable feeding areas within Dublin City is finite; and that the currently recognised feeding sites listed in the NIS, that are considered to be an alternative to the lands at St. Paul's, may be currently experiencing pressures, including recreational disturbances, that may limit their capacity to accommodate the loss of such a resource likely to occur as a result of the proposed development

In addition:

- Particular emphasis needs to be placed on the cumulative impact aspects of the AA
- ABP appropriate assessment will need to consider the findings detailed in the NIS and this Department's submission, in view of the potential impact on the conservation objectives of the European sites in question to maintain the favourable conservation condition of Light-bellied Brent Geese and those of the other listed species of special conservation interest
- This proposed development and its potential effects on site integrity will also need to be considered by ABP in their appropriate assessment in combination

with other consented developments and plans, as cumulative effects may arise. With regard to cumulative effects it should be noted that amenity parks and grass sports fields provide valuable Brent Geese feeding areas and that replacing them with all-weather pitches or providing new all-weather pitches in schools or parks managed by the local authority will also result in the loss of Brent Geese feeding. In reaching their decision, ABP should consider whether adequate areas will be left for Brent Geese feeding into the future and whether lands are zoned appropriately in relevant County Development and Local Area Plans to ensure that the Local Authorities comply with the Birds Directive

An Taisce:

Potential for the proposed development to effect the integrity of the North Bull Island SPA, South Dublin Bay and River Tolka SPA, Baldoyle SPA, Malahide Estuary SPA and Rogerstown SPA as a result of inland feeding habitat utilised by Light-bellied Brent Geese. St. Paul's is considered to be one of the most important ex-situ inland feeding sites located within the existing network of known sites for the last five seasons. Based on marked bird sightings, it is clear that the inland feeding site of St. Paul's has a relationship with the aforementioned SPAs, particularly the North Bull Island SPA and the South Dublin Bay and River Tolka Estuary SPA.

Considers that impacts on the SPA and Brent Geese population have not been adequately assessed. The considerations do not appear to be scientifically founded and considers that the language used within includes an element of assumption.

Irish Water:

Based upon the details provided by the developer and the Confirmation of Feasibility issued by Irish Water, Irish Water confirms that subject to a valid connection being put in place between Irish Water and the developer, the proposed connection(s) to the Irish Water network(s) can be facilitated.

Transport Infrastructure Ireland:

No observations to make

National Transport Authority:

Cited policy documents support the consolidation of development into existing urban areas in locations served by existing and planned public transport. The site of the proposed development is within 1km walking distance of both Killester and Harmonstown DART stations and is served by the Howth Road Bus Corridor with services to the city centre every few minutes throughout the day from Baldoyle and Howth. As such, the NTA is of the view that the proposed development aligns closely with prevailing national and regional policy, including the Transport Strategy.

10.0 Oral Hearing Request

Section 18 of the Act provides that, before deciding if an oral hearing for a strategic housing development application should be held, the Board:

- (i) Shall have regard to the exceptional circumstances requiring the urgent delivery of housing as set out in the Action Plan for Housing and Homelessness, and
- (ii) Shall only hold an oral hearing if it decides, having regard to the particular circumstances of the application, that there is a compelling case for such a hearing.

In my opinion there is sufficient information on file to allow for a proper and full assessment of the case without recourse to an oral hearing. I note the observer submissions received and the contents thereof. Having regard to the information on file, to the nature of the proposed development and to the location of the development site, I do not consider that there is a compelling case for an oral hearing in this instance.

11.0 Assessment

11.1. I have had regard to all the documentation before me, including, *inter alia*, the report of the planning authority; the submissions received; the EIAR and NIS; the provisions of the Dublin City Development Plan 2016; relevant section 28 Ministerial guidelines; provisions of the Planning Acts, as amended and associated Regulations; the nearby designated sites; the Record of Section 5 Consultation Meeting; Inspector's Report at Pre-Application Consultation stage and Recommended Opinion; together with the Notice of the Pre-Application Consultation Opinion. I have twice visited the site and its environs. In my mind, the main issues relating to this application are:

- Principle of development
- Design and Layout
- Impacts on amenity
- Impacts on Sybil Hill House and St. Anne's Park
- Traffic and transportation
- Drainage
- Other matters
- Appropriate Assessment
- Environmental Impact Assessment

11.2. Principle of Proposed Development

11.2.1. Having regard to the nature and scale of development proposed, namely an application for 536 residential units located on lands which are 'open for consideration' for residential development under the zoning objective, I am of the opinion that the proposed development falls within the definition of Strategic Housing Development, as set out in section 3 of the Planning and Development (Housing) and Residential Tenancies Act 2016.

11.2.2. One matter requires clarification at the outset. Many of the submissions received state that the development site forms part of St. Anne's Park and that the

development if permitted will be constructed within the park boundaries. I wish to clarify my thinking on this matter at the outset. I am of the opinion that the subject site is not located within St. Anne's Park. The submitted documentation includes inter alia, a Masterplan, EIAR and Conservation Impact Assessment which outlines the land ownership history at St. Paul's College historically through to the 1950s up to the present time. The information provided states that historically Arthur E. Guinness did not incorporate the subject lands into the landscaped grounds of St. Anne's Park and historically they were occupied separately. Details of land swaps relating to parcels of land between the various owners are outlined within the Masterplan (page 12-14). St. Paul's College opened in 1952 and the subject site has formed part of the grounds of the college since that time. The Dublin City zoning map for the area clearly differentiates between the park and the subject lands. The park is zoned Objective Z9 while the subject lands are zoned Objective Z15. One is zoned for open space uses, the other for institutional development. The boundaries of the park are clearly defined by a belt of trees that run along all three sides adjacent to the application site and likewise the boundaries of the site are clearly defined with high green metal fencing. The subject site was most recently owned and utilised by St. Paul's College for use as their playing pitches. While the two greens areas (playing pitches and park) lie side by side, they are clearly two distinct areas. St. Anne's Park is in public ownership, the subject site is a privately owned landholding. This application is therefore considered not to be the privatisation of a publically owned asset as has been stated in many of the submissions received. One is accessible to the public, one is fenced off and inaccessible. Having regard to all of information before me, I will reiterate that it is my opinion that the subject site does not form part of St. Anne's Park.

- 11.2.3. The proposed development is located on lands zoned 'Objective Z15', which seeks to 'protect and provide for institutional and community uses and to ensure the existing amenities are protected' within the operative City Development Plan. Residential development is 'open for consideration' within this zoning objective, while 'childcare facility' is a 'permissible use'. Section 14.8.14 of the operative City Development Plan states that where there is an existing institutional and/or community use, the following is required to be demonstrated:

- How the proposal is in accordance with and assists in securing the aims of the zoning objective
- How it secures the retention of the main institutional and community uses on the lands, including space for any necessary expansion of such uses
- How it secures the retention existing functional open space e.g school playing fields
- The manner in which the nature and scale of the proposal integrates with the surrounding land uses

11.2.4. The issue of the Z15 Masterplan as it related to the replacement of the existing sporting facilities at the site was raised in the Section 5 Notice of Pre-Application Opinion which issued from An Bord Pleanála and it further stated that a planning report to address consistency with the Z15 zoning objective should be submitted with any application for permission. The current application includes for a 'Z15 Institutional Lands, Landuse Disposition Masterplan'. The Masterplan attempts to deal with the four issues set out above, as required by the Dublin City Development Plan.

11.2.5. In considering the residential use proposed for these Z15 lands, I am aware of a number of Board decisions to grant permission on similarly zoned lands in recent times, for example PL29S.243181 in Mount Argus; PL29S.234927 Marianella, Rathgar and PL29N.246250 on Sybil Hill Road, Raheny. The requirements of the Z15 zoning objective, as set out above are critical to this application and the issue of zoning has been raised in a large proportion of the submissions received. When examining this issue, I consider that the subject site should not be examined in isolation, instead the entire parcel of land zoned Objective Z15 at this location should be examined in totality- as one entity. It is clear from an examination of the zoning map that the main institutions will remain, namely St. Paul's College and the Vincentian occupied Sybil Hill House on the eastern side of Sybil Hill Road, together with a nursing home and convent on the western side of Sybil Hill Road and St. Brigid's primary school fronting onto Howth Road. These institutional uses will remain as existing, albeit that the ground available to St. Paul's College will be reduced in area to cater for the proposed residential development. I note that the development permitted under PL29N.246250 for 76 residential units resulted in the

loss of an institutional use on these overall lands with the redevelopment swimming pool complex that was previously on that site.

- 11.2.6. There will be a total loss of 6 pitches as a result of the proposed development- 3 x soccer pitches, 2 x rugby pitches and 1 x GAA pitch. While I acknowledge the loss of the playing pitches within St. Paul's to the wider community, it may be argued that first and foremost these pitches were available for school use. Outside of school times and when not required by the school, agreements appear to have been in place for their use by community groups/local sports clubs. Detailed submissions have been received from both private individuals and sports clubs outlining the structure which was in place until relatively recently, the pitches involved, the sports involved, the numbers using them, hours of use and the like. This information is very helpful, given that there is a lack of such detail within the submitted masterplan and I consider the masterplan to be somewhat lacking in this regard.
- 11.2.7. A separate application for permission has been lodged to Dublin City Council under Reg. Ref. 3777/17 for development of new pitches, sports hall and ancillary site works. The aim of these new facilities is to replace the loss of playing pitches as a result of the development of this current site and if permitted, they would remain part of the school use-reinforcing the institutional use of the lands. Further information was requested by the planning authority on a number of substantial grounds, which has not yet been responded to by the applicants. These facilities occupy a stated 2.369 hectares, just short of the 2.8 hectares required for public open space for the original St. Paul's campus. The Masterplan continually refers to the sports hall and synthetic pitches applied for under Reg. Ref. 3777/17 as if they are permitted development. This is not the case. The attention of the Bord is drawn to the fact that there is no decision as yet on that file and that proposal is outside the remit of this current application. As it currently stands these facilities do not exist and reference to such items as '*commitments to community use are maintained with the addition of significant new capability in the new sports hall*' could be construed as misleading. I therefore consider that in the absence of a grant of permission for these uses, they should not be included in the overall calculations of open space/community facilities. If that development is permitted at some stage in the future, the development would aid in the retention of existing functional open space.

But until such time as that occurs, there will be a loss of playing pitches on the overall parcel of Z15 lands.

11.2.8. I acknowledge that this is an emotive issue and that there is a change to what appears to have been an established practice. I also acknowledge that the loss of pitches will result in impacts on local sports club in the interim until they find alternative facilities. It appears that the grounds have been unavailable to third parties since the end of 2017. However notwithstanding the above, it is ultimately at the discretion of the owner of the lands to continue with this arrangement of allowing third parties use their lands or not. This land is in private ownership and the burden should not be solely on them to provide community/public playing facilities on their lands for the wider community. While this may have been an established practice when the lands were in school ownership, as is the case with many such facilities which are in school ownership, the fact remains that the lands have been sold to a third party, namely Crekav Trading GP Ltd and it is the current owner's prerogative to allow such use continue or not. Compliance with the zoning objective for the site is a separate matter.

11.2.9. It is stated within the documentation that these lands were surplus to school requirements and were disposed of in 2015 with the monies being used to fund the upgrade of St. Paul's College and the construction of a new sports hall and synthetic pitches. This appears to be a reasonable argument on the part of the developer. The issue of the lands being surplus to the school's requirement is disputed in many of the submissions received. It has been raised in the Chief Executive Officer's report from the planning authority, namely that there will remain limited lands for extension of the school into the future, if the proposed development were permitted. Of critical importance in this argument is a letter from the Department of Education and Skills (dated 02/08/17), attached to the file, which states that with reference to the development of lands at St. Paul's Secondary School, the Department has carried out an exercise of the future figures and in consultation with a number of sections in the Department are satisfied that the development at St. Paul's will not adversely affect their future projections. When considering the educational implications, it is stated that they included the increased demand due to the development at St. Paul's, both at primary and post primary level. Based on this, the Department has no objections to this development. In my mind, this letter cements

the argument of the developer in this regard, is considered reasonable and in the absence of any other official information to the contrary, adequately demonstrates to me that the school holding as proposed is sufficient to cater for anticipated need/growth into the future.

11.2.10. In terms of compliance with the Z15 zoning and provision of community facilities, I note that community facilities remain in place within the existing school gym outside of school hours. In addition, the attention of the Board is drawn to the fact that within the proposed development, just over 1000 square metres of community space is being provided within Blocks 1 and 6. This includes community meeting rooms, hot desk areas, gym, cinema and games room, all available for public use through a booking system. Therefore, the argument may be made that while one form of community use is being lost, namely the playing pitches, they are being replaced by another form of community use. I tend to agree with the opinion of the planning authority that these proposed facilities will most likely be used by the residents of the proposed scheme, rather than the existing population in the wider area. However, future occupants will form part of the community. In any event, if the Board is disposed towards a grant of permission, I recommend that details regarding the usability of these facilities by the wider community, be dealt with by means of condition. I note that the layout of the proposed scheme is such that the communal areas of the apartment blocks and the courtyard garden areas of the houses are such that they will aid foster a sense of community for the inhabitants of the scheme, which is often lacking in new developments. This fostering of a sense of community is to be welcomed greatly in such schemes and will in time, become a community use for new inhabitants of the proposed scheme, if permitted.

11.2.11. The fact that the proposed development adjoins St. Anne's Park cannot be underestimated in terms of the facilities/amenities and open space on offer therein. This is the largest park within the control of Dublin City Council, stated to be 110 hectares in area. It is stated within the documentation that there are 35 playing pitches, 18 hard-surfaced tennis courts, 4 boules courts and a par-3 golf course, together with a playground and remote controlled model car track within the park. The subject site has direct access into the park, with three pedestrian linkages proposed. One of my visits was to St. Anne's Park on Sunday 25th February 2018 at around 1pm. I noted at the time that while many pitches were in use, quite a number

were unused. The subject site is also located within close proximity of the seafront at Clontarf, with all the amenities that it has to offer. This is an established area and there is an abundance of facilities on offer in close proximity to the site. This is often not the case in other newly developing areas where the loss of community facilities may have a greater effect.

11.2.12. As I have stated above, I acknowledge that this is an emotive issue and I recognise the loss of the pitches and the impacts this may have on the users of these facilities. However, notwithstanding this, I must assess the application from a planning perspective. The land is in private ownership and it is the prerogative of the owners to cease to allow third parties access or use their lands, if they so wish. In the absence of a grant of permission for development applied for under Reg. Ref. 3777/17, there will be a loss of playing facilities as a result of the proposed development. However, these will be substituted with other community facilities within the proposed development, albeit facilities of a different nature. It is also recognised that this is a well-serviced established area, adjoining St. Anne's Park, with all the facilities that it has to offer which includes for a stated 37 playing pitches. I therefore consider that the loss of the pitches is acceptable in this instance. I draw the attention of the Board to the opinion of the planning authority that a condition requiring a financial contribution towards the acquisition and/or development of lands for active recreation to cater for the football clubs affected the development should be attached to any grant of permission.

11.2.13. I note the Development Plan requirement for 25% public open space be provided in any such development on institutional lands. In this instance, a stated 24.79% external public open space is provided within the red line boundary, which includes for a substantial kick-about area and playground at the north-eastern portion of the site, adjoining St. Anne's Park. The planning authority in their Chief Executive Report raises issue with this figure and considers that P3 and P4 are landscape buffer zones and should not be included within this calculation of public open space. I would concur with this assertion and consider that these two areas are residual in nature and should not form part of the public open space calculations. This would result in public open space provision in the region of 18.7%. Considering the location of the site adjacent to St. Anne's Park, I consider it acceptable to attach a contribution in lieu of the shortfall of open space provision in this instance.

11.2.14. This is a zoned, serviceable greenfield site at an urban location, close to the city centre. It is well served with public transport links and is located in an established area where good services and facilities are available. I am cognisant of the recent Board decisions for residential developments on similarly zoned lands throughout the city, as detailed above. I am of the opinion that the applicant has satisfied the four main criteria within the zoning objective. Based on the information before me, I consider that the proposal is in accordance and assists in securing the aims of zoning objective. I consider that the proposal is not a material contravention of the operative City Development Plan. The main institutional and community uses are being retained on the overall Z15 parcel of land. While the playing pitches are being removed, public and communal open space is being retained/proposed within the overall Z15 land parcel and alternative community uses are provided for. A substantial amount of functional open space, with active recreational facilities is available in the adjoining St. Anne's Park. Public amenity space is also available at the seafront, which is in close proximity to the site. I shall deal with how the proposal interacts with surrounding land uses below. Having regard to all of the above, I consider the principle of the proposed development to be appropriate at this location and generally in compliance with the zoning objective for the area, as set out in the operative Dublin City Development Plan.

11.3. **Design and Layout**

11.3.1. The proposal provides for 536 residential units (104 no. houses and 432 no. apartments) on a largely rectangular site. The site has no road frontage and access thereto is from an existing entrance onto Sybil Hill Road. This existing entrance is being upgraded to cater for the proposed development. A Statement of Consistency with Urban Design Manual (2009) is included with the application. The layout of the proposed development is such that there are two distinct zones- the apartment zone to the north, containing six individual apartment blocks and the housing zone to the south containing four distinct courtyard areas. The two zones are separated by an access spine road through from Sybil Hill Road which is reminiscent somewhat of the 19th century Avenue within St. Anne's Park to the south. Three dedicated entrances are proposed into the park from the site- two to the east and one to the north.

- 11.3.2. The apartment blocks range in height from 5-8 storeys while the proposed dwellings are 3 storeys in height. Green roofs are proposed for all blocks. It is stated that the aim was to create a parkland setting around the proposed apartment blocks. This has been achieved in my opinion with substantial areas of public and communal open space provided for, with direct linkages into the adjacent park. The housing element is set out in a grid formation, such that there are 4 semi-private communal courtyards proposed solely for use by residents of these properties. Parking is largely provided at basement level. The design of the proposed scheme is contemporary in style with quality materials and finishes proposed. Permeability through the site is good as are connections with the wider area. This is not a gated community, there are good linkages through to Sybil Hill Road and the wider area and also through to the adjoining park.
- 11.3.3. Density at 88 units/ha is considered appropriate for this location and in compliance with relevant section 28 ministerial guidelines.
- 11.3.4. Unit mix is good with 155 x 1 bed units, 244 x 2 bed, 129 x 3 bed and 8 x 4 bed units proposed. This would lead to a good population mix within the scheme, catering to persons at various stages of the lifecycle, in accordance with the Urban Design Manual. Given the established nature of the area, the proposed development could aid those wishing to downsize but remain in the general area, thereby freeing up some existing housing stock.
- 11.3.5. Section 16.7 of the operative Dublin City Development Plan deals with the issue of building height and acknowledges the intrinsic quality of Dublin as a low-rise city. It is stated that within rail hubs, a height of 24 metres for both commercial and residential developments will be considered. Rail hubs are defined as being within 500m of existing and proposed Luas, mainline, DART, DART Underground and Metro stations. This matter has been raised in many of the submissions received, namely that the proposed site is further than a 500m walk to the nearest DART station at Harmonstown. I note that the definition as set out in the City Development Plan does not specifically state that this 500m is to be a direct route. The 500m zone affects the apartment zone of the site only. I note the height of the blocks proposed from 5 to 8 storeys. I note the northern eight storey element of Block 1 is wholly within the zone, the middle 7 storey element of this block and Block 2 are substantially within the zone whereas Block 4 is substantially outside of the 500m

boundary. I concur with the planning authority, as set out in the Chief Executive Report that the height of this Block should be reduced to maximum of 5 storeys to comply with Development Plan policy. This would result in the loss of 24 units from the proposal. The matter could be dealt with by condition if the Bord were disposed towards a grant of permission. The height of the remainder of the scheme is considered acceptable.

- 11.3.6. The location of the childcare facility is considered acceptable. It is anticipated that many users may live within the development and walk to it. There may also be complimentary travel journeys as people drop-off at schools in the vicinity. There are 9 car parking spaces proposed in the vicinity of the building (5 for crèche and 4 drop-off), for those wishing to drive. This is considered acceptable.
- 11.3.7. Open space provision has largely been dealt with above. A stated 24.7% of the site is dedicated to public open space, with the aim of creating a parkland layout surrounding the apartment blocks. This figure is disputed and has been dealt with above. A Landscaping Design Rational & Outline Landscape Specification was submitted with the application. Overlooking and passive surveillance of the open space areas is good. I note the point raised by the planning authority in the Chief Executive Report in relation to opening times/access of the pedestrian gates into the park and their experience from similar schemes elsewhere. If the Bord is disposed towards a grant of permission, I recommend that this matter be dealt with by condition. Private open space is provided in the form of balconies/terraces to the apartments while a small rear garden/terrace area is provided to each of the dwellings which opens onto a landscaped communal courtyard area. A minimum 2 metre deep terrace is provided to each of the ground floor apartment units to create a buffer/privacy strip. Open space provision is attractive with good landscaping proposed and the proposal is generally considered to be in compliance with Development Plan standards in this regard.
- 11.3.8. The proposal has the potential to be an attractive place in which to live and work. The density is considered appropriate given the location of the site and the proposal is not considered to represent overdevelopment of the site. The site is well served by public transport, there are two DART stations (Harmonstown and Killester) within a few minutes walk of the site with approximately 74 services per day in each direction and there is a QBC on the Howth Road. The mix of units proposed is such

that it would cater to a wide range of people with differing accommodation needs. Floor areas are all above minimum standards and the communal areas to both the apartment blocks and houses have the potential to create vibrancy and a sense of community within the scheme. Quality finishes are proposed and the location of the subject site adjacent to St. Anne's Park enhances the amenity value immeasurably. A 24hr concierge is provided within Block 1 to increase security within the proposed scheme. The proposal is considered to be generally in compliance with the operative Dublin City Development Plan and relevant section 28 ministerial guidelines in this regard.

11.4. Impacts on Amenity

11.4.1. Impacts on the residential amenity of properties within 'The Meadows' residential development to the west of the site requires addressing. This potential issue was highlighted in the Section 5 Pre-Application Consultation Opinion which issued from An Bord Pleanála which highlighted potential impact on the residential and visual amenities of the properties within The Meadows. Block 1 is the closest proposed block to these existing properties. In my mind, it is properties No.s 9-15 that have the potential to be most greatly affected, as these are the closest residential properties. The outlook of these properties will be altered. A separation distance of greater than 49 metres is proposed from Block 1 to the rear boundary wall of these properties. Currently the boundary between the sites comprises a high wall and there is some tree cover at this location- mostly Category C trees are being retained. The proposal involves retaining the existing wall, removing 7 of these existing trees (due to condition) and supplementing the existing planting with additional landscaping. It is proposed to step down Block 1 with the highest element being nearest the northern boundary (eight storeys) stepping down to 5 storeys at its southern end. Given the height differentials, it is anticipated that there may be some overlooking of the existing residential dwellings, in particular from the upper floors of Block 1. However, I note the design features proposed to minimise such impacts which include setback of penthouse levels and the fact that many of the rooms on the western elevation of Block 1 are bedrooms. Having regard to the separation distances involved, I do not anticipate this to be excessive. Impacts on privacy would not be significant and I have no information before me to believe that the proposal if permitted would lead to devaluation of property in the vicinity.

- 11.4.2. A Shadow Study was submitted with the application, included with the Landscape Design Rationale Report. The shadow study included the potential from shadows arising from new tree planting. The assessment concludes that the proposal will not give rise to any appreciable shadowing of the properties at The Meadows.
- 11.4.3. A Public Street Lighting Analysis was submitted with the application which outlines measures to contain lighting within the site and minimise light pollution and visual glare to residential neighbours. The information contained therein is considered acceptable and I recommend the matter be dealt with by condition, if the Bord is disposed towards a grant of permission. Impacts of lighting on bats is dealt with within the EIAR.
- 11.4.4. There may be some noise disruption during the course of construction works. Such disturbance is anticipated to be relatively short-lived in nature. The nature of the proposal is such that I do not anticipate there to be excessive noise/disturbance once construction works are completed. However, if the Bord is disposed towards a grant of permission, I recommend that such issues like wheel wash facilities, hours of works and the like be dealt with by means of condition. In addition, a Construction Management Plan should be submitted and agreed with the Planning Authority prior to the commencement of any works on site.
- 11.4.5. The level of amenity being afforded to proposed occupants is considered good. Adequate separation distances are proposed between blocks to avoid issues of overshadowing or overlooking. A Daylight Sunlight Assessment was submitted with the application which indicates that acceptable levels of daylight/sunlight can be achieved across the development. It is noted that a small number of apartments fall below the BRE guidelines for daylight but this is based on a worst case scenario and many of these rooms are bedrooms with an external balcony space. This is considered acceptable in this instance.
- 11.4.6. I note the report of the planning authority as set out in the Chief Executive Report which states that on balance, it is considered that the proposed height, mass and scale is acceptable and would not be visually obtrusive and would not significantly detract from the amenities or setting of adjacent property including St. Anne's Park or the Protected Structure in terms of overlooking, overshadowing or overbearing having regard to the need to provide high density residential development as

outlined in the Development Plan; the submitted Conservation Impact Statement; the separation distances between Block 1 and The Meadows estate; the existing mature planting and proposed new planting which will screen the development; the submitted shadow analysis showing no appreciable shadowing of the properties at The Meadows; design features to reduce potential impact such as lowering of the ground level of Block 1 and set back penthouse level and the example of Herbert Park where substantial apartment development is successfully located close to an established public park.

11.4.7. Having regard to all of the above, including separation distances involved, the design rationale and the existing/proposed screening, I consider that the proposed development would not be visually obtrusive at this location, would not be out of character with the established pattern of development and that the impacts on existing visual and residential amenity would not be so great as to warrant a refusal of permission.

11.5. Impacts on Sybil Hill House and St. Anne's Park

11.5.1. The impacts of the proposed development on St. Anne's Park requires addressing. The Section 5 Pre-Application Consultation Opinion which issued from An Bord Pleanála required that the potential impacts on the visual amenities of St. Anne's Park and on the setting of Sybil Hill House, a Protected Structure needed to be addressed at application stage. I note the report of the Department of Culture, Heritage and the Gaeltacht in this regard which recommends that Further Information be requested in relation to provision of a full impact assessment of the proposed impact of development in the historical context and should include overall understanding of cultural landscape of St. Anne's Park in relation to subject site; visual and architectural impact assessment; selected views and justification of transition from local scale to monolithic block. I also note the report of the planning authority, as set out in the Chief Executive Report, which states that on balance, it is considered that the proposed height, mass and scale is acceptable and would not be visually obtrusive and would not significantly detract from the amenities or setting of adjacent property including St. Anne's Park or the Protected Structure in terms of overlooking, overshadowing or overbearing.

- 11.5.2. I have examined all of the information before me and have conducted visits of the site, the park and the environs. A Conservation Impact Assessment has been submitted with the application, as has a Geophysical Survey of Maryville House, photomontages, CGIs, cross sections, satellite imagery and landscaping details. The application site is bounded by St. Anne's Park on the northern, eastern and southern sides. St. Anne's Park is designated as a Conservation Area within the operative Dublin City Development Plan. I note the DAU submission in relation to the overall understanding of the cultural landscape. I consider that there is adequate information on file in this regard in order to undertake a comprehensive assessment of the proposal and consider that the issues raised in the report of DAU are substantially addressed within the application.
- 11.5.3. The series of historical maps submitted with the application give a clear view of the evolution of the area from 1655 up to the present time. These are included as part of the archaeological and historical context, as set out in the submitted EIAR. It is clear that the subject site historically formed part of the grounds of Maryville and Sybil Hill House. When the landscaped demesne of St. Anne's was laid out in the late 19th century, Raheny was but a rural village. The park was surrounded by undeveloped lands. Over time, the rural character of the area and the setting of the demesne of St. Anne's has altered as the city has grown and evolved. Today we can observe development surrounding the park on all sides. Maryville has long since been demolished and since the 1950s, the grounds and setting of Sybil Hill House have been altered by the construction of St. Paul's College. From the information before me, it appears that the subject site never formed part of the landscaped set-piece that is St. Anne's Park. It was never laid out as such and since the 1950s has been a man-made landscape, namely set out as playing pitches.
- 11.5.4. Based on all of the information before me, I have no reason to believe that the proposed development, if permitted would negatively impact on the amenity of the park to such an extent as to warrant a refusal of permission. I also have no information to believe that the proposal would negatively impinge on tourism in the area. I acknowledge that the proposal will be visible from some vantage points within the park. The dense planting along the eastern site edge is such that it will not, in the main be visible from the eastern side, apart from the upper floors of the proposed apartment blocks. I consider that the development will be most visible

when viewed from points along the 19th century Avenue which is located to the south of the site. This issue has been raised in many of the submissions received. The Avenue was laid out in the 1880s, originally leading to the mansion at St. Anne's although not forming a direct connection to a road at the western end. The Avenue is lined with evergreen oaks and in my opinion, the view will be fleeting glances through the existing trees, below their canopy level rather than direct, uninterrupted views. To counteract this, a line of tree planting is proposed along the southern boundary of the site, which will greatly increase screening at this location. Essentially, a double layer of planting will exist between the proposed development and the Avenue. In my mind, the greatest visibility from the Avenue will be when looking through the south-eastern quadrant, where there is currently little in the way of screening. The proposed development is set back approximately 35 metres from its nearest point with the Avenue.

11.5.5. I consider the fact that the proposed development will be visible from various vantage points within the park is not necessarily a negative given the location of the park within an urban area. This is a city park, located within an established urban area. The properties fronting onto All Saint's Road are visible from various points within the park and in my opinion do not detract from the amenity enjoyed therein. Many cities throughout the world from London to New York have perimeter development along the edges of their city parks. Perimeter development has been permitted along the boundary of the Phoenix Park and Herbert Park. It adds to the amenity of these properties, gives a strong urban edge to the park and creates a degree of active supervision of the park. It makes the park more accessible- in addition to its current users it now has the potential to be additionally used by the future occupiers of the proposed scheme. A busy park is a successful park. The scale of St. Anne's Park, at 110 hectares is such that I feel that the proposed development is not going to dominate or overwhelm it- the proposed development merely becomes another edge to it. In my opinion, the park has the capacity to absorb the scale of development proposed on the adjoining lands, without detriment to the park itself. I note the submitted CGIs showing the views of the proposed development from various vantage points in the vicinity, including views from within the park. The views all show the trees in full foliage, taken during the summer months and in my opinion, therefore do not show the full extent of the views during

the winter months. I do note however that the oaks along the Avenue are stated to be evergreen. Irrespective of the time of year, essentially it would be the top most part of the apartment blocks which would be most visible from the public domain. The remainder of the development proposed, due to their height and location would be well screened by existing and proposed planting. This is enforced by the fact that the park is laid out in a series of 'urban rooms', with dense planting forming the 'walls' of these 'rooms' making views through from 'room to room' difficult. The proposal does not involve the removal of any trees from the park, with the exception of those required to facilitate the proposed pedestrian entrances into the park and enhanced planting along the perimeter of the site is proposed.

- 11.5.6. Concerns have been raised with regards overshadowing/loss of light of St. Anne's Park as a result of the proposed development. Given the size of the park, the orientation of the site, the separation distances involved and the existing/proposed screening, I consider that overshadowing or loss of light would not be excessive. In addition to this, I note that the proposed dwelling houses, which are lower in height are located at the southern end of the site to reduce shading of the Avenue.
- 11.5.7. I note St. Anne's Park is one of eight designated 'Quiet Areas' within the city. Given the nature of the development proposed, I have no reason to believe that the proposal if permitted would impinge on this designation.
- 11.5.8. As has been stated above, a Public Street Lighting Analysis was submitted with the application which outlines measures to contain lighting within the site and minimise light pollution and visual glare to residential neighbours and the adjoining public park. The information contained therein is considered acceptable and I am satisfied that the amount of glare into the park would not be excessive. Impacts on bats is dealt with within the EIAR. I recommend the matter be dealt with by condition, if the Bord is disposed towards a grant of permission.
- 11.5.9. The impact on the root systems of the trees located along the Avenue has been raised as a concern in many of the submissions received. I acknowledge the concerns raised. A Tree Protection Plan and Tree Impact Assessment Plan have been submitted with the application, together with a Landscape Masterplan. This includes for a planted buffer to ensure trees are not damaged, together with identified construction exclusion zones and ground protection and controlled work

zones. Having regard to all of the information before me and having regard to the separation distances involved, I would not have undue concerns in this regard. If the Bord is disposed towards a grant of permission, I recommend that a condition relating to appropriate mitigation measures be attached in relation to this matter. I also note that the Chief Executive Report from the planning authority suggests attaching a security bond of €100,000 as security to ensure the appropriate protection of the trees on the development site and St. Anne's Park. Given the value of the trees in St. Anne's Park, I consider that such a bond is justified in this instance.

11.5.10. Sybil Hill House is designated as a Protected Structure (Ref. 7910) under the operative City Development Plan. This is an 18th century, two-storey villa which was altered and extended in the 19th century to its present form. Externally, the property is rendered and has its main entrance facing southwards. The spur of land which forms part of the access from Sybil Hill Road to the subject site once formed part of the grounds of Sybil Hill House. The House is set on its own grounds and is separated from St. Paul's College by a driveway, parking area and lawned area. At the front of the House, a ha-ha gives a clear demarcation between the grounds of the house and that of the college. The existing access roadway, which is located to the south of the property is being widened and I note that the u existing pillars/entrance, proposed for removal and replacement appear not to be of heritage value. The replacement entrance is considered acceptable in terms of visual impacts. It is recommend in the Conservation Impact Assessment that a belt of small trees, such as rowan or whitebeam be planted along the northern edge of the access roadway to improve screening between the Protected Structure and the access roadway. This is considered acceptable.

11.5.11. In terms of impacts on the Protected Structure from the residential component of the proposal, I am satisfied that this would not be excessive. I note the nearest part of the development to Sybil Hill House is Block 1. This has a separation distance of approximately 80 metres and is stepped down to from eight to five storeys nearest the Protected Structure. The two rows of blocks behind are at a lower height and will not be visible. I also note that Block 1 is closest the eastern side of Sybil Hill House, which is noted to be the least significant side of the property as it faces a courtyard of utilitarian buildings, never intended to be considered a

significant side of the property. From inside the property itself, the main views are south, west and to a lesser extent, north. As a result, the proposed development would have little impact on these views. I also note that the existing properties within 'The Meadows' are located in closer proximity to the House, as are some buildings of St. Paul's College, albeit I acknowledge these are at a lower height than those proposed for Block 1. The submitted CGIs show that the proposed development, primarily Block 1, will be visible from the grounds of Sybil Hill House. However, it must be acknowledged that the modern school buildings are presently an established feature within the setting of the House. In addition, the apartment development, currently under construction to the north, is visible from the site. Again, as I have stated above, this is an urban context and I do not necessarily believe that a view of the development as proposed, is a negative. There are countless examples throughout the city where new buildings have been constructed in close proximity to historic properties without detriment to them. Such proposals are inevitable in an evolving city. I note the proposal involves the retention, if possible of the surviving northern wall of the walled garden associated with Maryville and is the only extant remnant associated with Maryville. This is to be welcomed. It is stated in the Conservation Impact Assessment that the mode of construction was typical of the time, built from stone which was relatively cheap and faced with brick into the garden. I note that the Board has previously granted permission for the demolition of the western portion of the wall, under Reg. Ref. PL29N.246250.

11.5.12. Having regard to all of the above, I am satisfied that the development as proposed would not impinge on the character or amenity of St. Anne's Park to such an extent as to warrant a refusal of permission. I also consider that the character and setting of Sybil Hill House will not be significantly impinged upon, in particular having regard to the modern inventions that currently exist within the context of the setting of the Protected Structure.

11.6. **Traffic and Transportation**

11.6.1. The Section 5 Pre-Application Opinion which issued from An Bord Pleanála required a justification for the proposed quantum of car parking in view of (i) the proximity of the site to Harmonstown Dart station and the Howth Road QBC and (ii) the location of the site within Development Plan Parking Zone 2. A significant volume of the

submissions received raised concerns, inter alia, in relation to increased traffic, pedestrian safety, overspill and public transport services in the area.

- 11.6.2. The proposed development will be accessed from Sybil Hill Road (R808), at a point approximately 200 metres to the south of the Howth Road junction. Howth Road is recognised as a primary arterial road connecting the North Dublin suburbs with the city centre and beyond. The parking provision, outlined in Table 6 above, sets out the division of the 634 car parking spaces proposed. The proposal aims to upgrade the existing access to the Vincentian Residence and extend same to provide access to the proposed development. Access to the school will remain unaltered and a gated access to the school will be provided off the proposed access to provide linkage between the Vincentian residence and the school. An upgraded priority junction is proposed off Sybil Hill Road.
- 11.6.3. A Traffic Impact Assessment and Mobility Management Plan was submitted with the application, as required, prepared by ILTP Consulting. A Road Safety Audit was also submitted. The TIA recognises that the site is well served by both existing bus and rail services. Trip generation figures for the proposed development used TRICS software and it is stated that the trip rates used are likely to be an overestimation on the net new trip generation rates due to the location of the site and mobility management proposals. It is stated that the traffic flows on Sybil Hill Road are relatively low in comparison with other urban roads in the area and the route is currently running well within the link capacity of this type of urban route. The proposed residential development is located approximately 200 metres from Sybil Hill Road. This is beneficial in preventing overspill car parking on Sybil Hill Road and ensuring that the proposed residential area will remain free from external parking. Picady analysis showed that the proposed access junction will operate at less than 22.5% of its capacity with development in place. The traffic flows at the Sybil Hill Road/Vernon Avenue are signal controlled and the overall impact of the proposed development will be very low at this location. The junction of Howth Road/Sybil Hill Road is currently heavily used at peak times, particularly at school times. The capacity of this junction was assessed and even when applying permitted development under construction and the separate sports hall/pitches development, the overall change in traffic flow through this junction will only increase by a relatively small amount. It is stated that the increase in traffic from the new development is

likely to result in changes to traffic patterns in the area rather than an increase in traffic on the wider network. It is also stated that the adjoining road network can readily accommodate the projected development traffic with minor improvements to the Howth Road/Sybil Hill Road junction.

11.6.4. The TIA concludes that although worst case scenario assumptions were made with respect to traffic flows and generation, it is demonstrated that the net overall traffic impact can be readily accommodated in the road network. It is anticipated that the proposal will promote sustainable travel patterns. The access and internal layout is designed in accordance with DMURS, promotes good permeability and facilitates sustainable travel patterns. I find the conclusions of this report to be reasonable and robust.

11.6.5. In terms of parking provision, it was noted that the subject site is located within Parking Zone 2, however the housing element of the proposed scheme is located adjacent to Zone 3. Development Plan standards were applied for the apartment element of the scheme, 1 space per unit. In relation to the proposed 104 houses, 96 no. are 3 bed units, with eight no. 4 bed units. Given the location adjacent to Zone 3 and the number of bedrooms in each house, it was considered by the applicants that Parking Zone 3 car parking standards were appropriate. I note that for residential development, the standards are 1 parking space per dwelling in Zones 1 and 2 and 1.5 spaces per dwelling in Zone 3. Therefore there is an excess of 52 spaces within the proposed development. Notwithstanding the location of the proposed housing area adjacent to Zone 3, this figure is considered somewhat excessive considering the location of the site relative to public transport links and the fact that the applicants are arguing for greater height, given the location of the site close to Harmonstown DART station. I therefore consider that the additional 52 spaces be omitted by condition. The number of car parking spaces will be further reduced to reflect the reduction in the number of apartments permitted as dealt with above. A further 24 car parking spaces shall be omitted to address this reduction. The total number of car parking spaces permitted would therefore be 558 no.

11.6.6. I note the report of the Roads and Traffic Planning Division of the planning authority, which has no objections to the proposal, subject to conditions. I am satisfied based

on all of the information before me that the existing road network has capacity to accommodate the proposed development; that the proposal would not lead to the creation of a traffic hazard or obstruction of road users and I consider the proposal to be acceptable in this regard.

11.7. Drainage

- 11.7.1. In term of site services, a new water connection to the public mains is proposed, together with a new connection to the public sewer. An Irish Water Pre-Connection Enquiry in relation to water and wastewater connections has been submitted, as required. It states that subject to connecting downstream to an identified 650mm constraint in the 1350mm wastewater main, the proposed wastewater connection to the Irish Water network can be facilitated. The report of the Drainage Division of the planning authority, as contained in the Chief Executive Report states that they have no objections to the proposed development, subject to conditions.
- 11.7.2. An Engineering Services Report was submitted with the application. It states that in terms of stormwater drainage, as the existing site is largely soft landscaping, SuDS proposals will be provided to mimic the existing runoff from the site. All SuDS measures will be provided in accordance with the Greater Dublin Strategic Drainage Study Regional Drainage Policy Vol. 2- New Development. There is an existing surface water connection to the existing public surface water network for the existing buildings adjacent to the site, however it is proposed to provide a new surface water network connection for the proposed development. The proposed discharge point is located approximately 100m from the northeast boundary. Due to flooding issues downstream of the existing surface water network on Sybil Hill Road, it is proposed to discharge all surface water to the Naniken Stream and not to the public sewer network, as requested by the planning authority.
- 11.7.3. It is proposed to provide a potable water supply in accordance with Irish Water requirements. There is an existing water main running along Sybil Hill Road. The proposed development will be served with a new 100mm diameter watermain laid in a new footpath along the new access road.
- 11.7.4. I note that a number of submission received raised concerns regarding flooding and additional flow/discharges into the Naniken Stream, as a result of the proposed development. The Naniken Stream is located to the north of the subject site. A Site

Specific Flood Risk Assessment, prepared by OCSC, was submitted with the application and I note the details contained therein. Residential development is classified as a highly vulnerable class within 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009) while amenity open space, outdoor sports and recreation are classified as water-compatible development. The site is located within Flood Zone C in accordance with these aforementioned guidelines and the proposed development is appropriate. The SSFRA states that there is no indication of fluvial flooding on the subject site and the site is not subject to fluvial flood risk. In terms of tidal flooding, it is noted that the subject site is located approximately 1.5km from the nearest tidal source at Dublin Bay. The Naniken Stream estuary is located approximately 1.41km to the east of the site. According to the OPW Draft Preliminary Flood Risk Assessment (2011) the nearest predicted location of a coastal flooding occurrence is at a point inland along Clontarf Road, approximately 1km south of the subject site. The site is well above the 0.1% AEP event level. It is concluded that there is no significant risk of coastal flooding and therefore no mitigation is required. In terms of pluvial flooding, it is noted that there is a site slope of approximately 6 metres along the southern boundary. Should the proposed drainage infrastructure become overwhelmed in a storm event above the 1% AEP, the excess surface water will drain away from the subject lands as the existing topography suggests. While existing topography will be changed, the natural direction of overland flow will remain unchanged. Overland flows will flow in a south-west direction away from proposed residential development. The risk of pluvial flooding is considered negligible and no further mitigation is necessary.

- 11.7.5. The proposed drainage system incorporates SuDS that will control the discharge rate and reduce the volumetric run-off from the site. It is proposed to attenuate all surface water run-off from the site using underground attenuation storage facilities. The surface water run-off will be discharged at a limited rate for the combined catchment areas within the site to the Naniken River, located north of the proposed development. This is as per the existing Naniken Stream storm water catchment. As the existing site provided no attenuation, the proposed development results in a reduction in the risk of flooding, on and off the site for the rainfall run-off from the subject site. Therefore, it is concluded that the flood risks arising from the proposed drainage infrastructure are negligible and no further mitigation is required. In terms

of groundwater flooding, there is no record or evidence of such for the subject site. Given the geology and topography of the subject site, it is concluded that the flood risk presented by ground water is negligible and further mitigation is not required.

11.7.6. I note all of the information before me in this regard. The information contained within the Site Specific Flood Risk Assessment and Engineering Reports appears reasonable and robust. I note the reports of Irish Water and the Drainage Division of the planning authority, as contained within the Chief Executive Report. I have examined the OPW website, www.floodmaps.ie which shows that there was flooding in areas close by but none on the subject site. There is a significant volume of information available in relation to this matter. I note that this is a serviced, appropriately zoned site at an urban location. I consider that having regard to all of the information before me, including the guidance contained within the relevant Section 28 guidelines on flood risk management that this matter can be adequately dealt with by means of condition.

11.8. **Other Matters**

11.8.1. I note that some submissions query the applicant's legal title in the subject site. The Board's role is limited to considering whether or not the applicants have demonstrated sufficient legal interest for the purposes of making a planning application. I am satisfied that the applicants have demonstrated such sufficient interest in the lands to make an application. The Chief Executive report from the planning authority clarifies that St. Paul's playing fields are not in Dublin City Council ownership as the land was sold to the Vincentians in three separate transactions in 1952, 1953 and 1959 without restrictive covenants. A mapping error to the contrary has been rectified with the Land Registry (PRAI). As in all such cases, the caveat provided for in Section 34(13) of the Planning and Development Act 2000, as amended, applies which stipulates that a person shall not be entitled solely by reason of a planning permission to carry out any development. I also note the provisions of Section 5.13 of the Guidelines for Planning Authorities, Development Management, 2007 in this regard.

11.8.2. Many of the submissions refer to the erection of a fence around the said playing pitches in 2001, on foot of a grant of permission under Reg. Ref. 2948/01. Some submissions refer to infringement of rights of way as a result of these works. Such

matters are considered to be legal issues, outside the remit of this planning application.

- 11.8.3. Many of the submissions received raise issue with the SHD process and perceived procedural inadequacies. To clarify, there is a link from the An Bord Pleanála website to the developer's website for this application. I am satisfied that the application process has been undertaken strictly in accordance with the Planning and Development (Housing) and Residential Tenancies Act 2016 and associated Regulations of 2017. The associated website, www.stpaulshd.ie, appears to be in compliance with this aforementioned legislation and I can confirm that I had no issue accessing documents thereon.
- 11.8.4. While it may be beneficial to all parties involved, there is no obligation on the applicant to undertake public consultation in relation to the proposed development. The volume of submissions received by the Board in relation to this application would support the conclusion that the public have been made aware of the proposed development.
- 11.8.5. I note the Part V details submitted and I note the report of the Chief Executive of the planning authority in this regard. I have no issue with the proposal in this regard.
- 11.8.6. I note some minor discrepancies in the submitted drawings. These are considered minor and do not impact on the outcome of the recommendation.
- 11.8.7. The applicants have applied for a ten-year permission. I note the phasing schedule attached with the application, which states that it is intended to construct the proposal over a 36 month timeframe. Having regard to the nature and scale of development proposed, I consider that a ten-year permission is not warranted in this instance. I recommend that this matter be dealt with by condition, if the Bord is disposed towards a grant of permission.
- 11.8.8. The issue of project splitting has been raised in some of the submissions received in relation to this proposed development and the development for sports facilities, lodged to the planning authority (Reg. 3777/17). The planning authority has addressed this issue in their Chief Executive Report and I would concur with their assertion. While the two sites are immediately adjacent to each other, they are stated to be in separate ownership. In addition, an EIAR and NIS have been submitted for this current application and the submitted EIAR for this current

proposal has considered the cumulative impacts of both proposals. This is considered acceptable.

12.0 Appropriate Assessment

12.1.1. The subject site is not located within any Designated European site, however the following Natura 2000 sites are located within 15km of it:

Table 9:

Site Name and Code	Distance from St. Paul's
Baldoyle Bay SAC (000199)	c. 4.9km
Howth Head cSAC (000202)	c. 6km
Rockabill to Dalkey Island cSAC (003000)	c. 6.8km
Malahide Estuary cSAC (000205)	c. 7.9km
Ireland's Eye cSAC (002193)	c. 8.7km
Rogerstown Estuary cSAC (000208)	c. 13.7km
Ireland's Eye SPA (004117)	c. 8.5km
Howth Head Coast SPA (004113)	c. 8.7km
Dalkey Islands SPA (004172)	c. 12.2km
North Bull Island SPA (004006)	c. 1.1km
South Dublin Bay and River Tolka Estuary SPA (004024)	c. 1.6km
Baldoyle Bay SPA (004016)	c. 4.9km
Malahide Estuary SPA (004025)	c. 7.9km
Rogerstown Estuary SPA (004015)	c. 13.7km
North Dublin Bay cSAC (000206)	c. 1.1km
South Dublin Bay cSAC (000210)	c. 3.5km

12.2. A Screening Report and NIS, prepared by Scott Cawley were submitted with the application. I am satisfied that adequate information is provided in respect of the baseline conditions, potential impacts are clearly identified and sound scientific information and knowledge was used. The information contained within these reports

is considered sufficient to allow me undertake an Appropriate Assessment of the proposed development.

12.3. The Stage One screening conclusions note that applying a precautionary principle, it is not possible to exclude the following sites:

Table 10:

Site Name	Site Code
North Bull Island SPA	004006
South Dublin Bay and River Tolka Estuary SPA	004024
Baldoyle Bay SPA	004016
Malahide Estuary SPA	004025
Rogerstown Estuary SPA	004015
South Dublin Bay cSAC	000210
North Dublin Bay cSAC	000206

12.4. I agree with the conclusions of the NIS that the Stage 2 AA can be confined to these seven sites listed above. The remaining sites identified in Table 9 above are considered to be of a sufficient distance so as not to be affected by the proposal, having regard to the nature of the proposal and the substantial marine buffer which exists.

12.5. The Stage 1 Screening Assessment identified the following SCI species during the 2015-2016 wintering bird surveys:

Table 11:

North Bull Island SPA	Sth Dublin Bay & River Tolka Estuary SPA	Baldoyle Bay SPA	Malahide Estuary SPA	Rogerstown Estuary SPA
Black- Headed Gull (max 69 birds)	Black- Headed Gull (max 69 birds)	Black-Tailed Godwit (max 400 birds)	Black- Headed Gull (max 400 birds)	Black- Headed Gull (max 400 birds)
Black-Tailed Godwit (max 400 birds)	Oystercatcher (max 58 birds)		Oystercatcher (max 58 birds)	Oystercatcher (max 58 birds)
Curlew (max 86 birds)				
Oystercatcher (max 58 birds)				

12.6. Many of the submissions received raised issue with the impacts of the proposed development on species of Special Conservation Interest, with curlews, oystercatcher and black-tailed godwit being of particular concern. The submissions considered that insufficient analysis was given to these species, which were omitted from the both NIS and EIAR. I note that the Stage 1 Screening Assessment stated that as the season peak counts of each of the above species were below the threshold of international importance, namely less than 1% of the international population, it was concluded that there is no possibility of significant effects on these SCI species as a consequence of the proposed development. To be of international importance, the figures for international importance are stated as being 20,000 birds for black-headed gull, 610 birds for black-tailed godwit, 8400 birds for curlew and 8,200 birds for oystercatcher. The figures cited above fall significantly below these thresholds in all instances. Therefore, in relation to the Special Conservation Interests listed above, I consider it reasonable to conclude that on the basis of the information on file, which I consider adequate in order to issue a screening determination, that the proposed development, individually or in combination with

other plans or projects would not be likely to have a significant effect on nearby European Sites in view of their Conservation Objectives for the SCI species identified in Table 11 above, and a Stage 2 Appropriate Assessment (and submission of a NIS) is not therefore required in relation to these Special Conservation Interest species.

- 12.7. The current conservation status of the qualifying interests and conditions underpinning site integrity for the relevant European sites, for which it is not possible to exclude is clearly set out in Table 1 of the NIS, pages 17-20 inclusive. A summary of the qualifying interests for each of the relevant sites is provided below.
- 12.8. Site specific conservation objectives (SSCOs) for the qualifying interests (QIs) and the Special Conservation Interests (SCIs) of North Bull Island SPA, South Dublin Bay and River Tolka Estuary SPA, Baldoyle Bay SPA, Malahide Estuary SPA and Rogerstown Estuary SPA and the Annex I Habitats and Annex II species of North Dublin Bay cSAC and South Dublin Bay cSAC are presented in Table 2 of the NIS, as set out on pages 20-29 inclusive. I also note the site synopsis and conservation objectives for each of the Natura 2000 sites are available on www.npws.ie website. I note that the conservation objective for the qualifying habitats and species of each of these designated sites is to maintain the favourable conservation condition.
- 12.9. Significant impacts cannot be excluded, on the basis of construction-related surface water discharge, in relation to the following four Designated Sites (Table 12). Their qualifying interests are summarised as follows:

Table 12:

South Dublin Bay cSAC	North Dublin Bay cSAC	North Bull Island SPA	S. Dublin Bay & River Tolka Est. SPA
Mudflats and sandflats not covered by seawater at low tide	Mudflats and sandflats not covered by seawater at low tide	Light-bellied Brent	Light-bellied Brent
Annual vegetation of drift lines	Annual vegetation of drift lines	Goose	Goose
Salicornia and other annuals colonising mud and sand	Salicornia and other annuals colonising mud and sand	Shelduck	Oystercatcher
Embryonic shifting dunes	Atlantic salt meadows	Teal	Ringed Plover
	Mediterranean salt meadows	Pintail	Grey Plover
	Embryonic shifting dunes	Shoveler	Knot
	Shifting dunes along the shoreline with white dunes	Oystercatcher	Sanderling Dunlin
	Fixed coastal dunes with grey dunes	Golden Plover	Bar-tailed Godwit
	Humid dune slacks	Grey Plover	Redshank
	Petalwort	Knot	Black-headed Gull
		Sanderling	Roseate Tern
		Dunlin	Common Tern
		Black-tailed Godwit	Arctic Tern
		Bar-tailed Godwit	Wetlands & Waterbirds
		Curlew	
		Redshank	
		Turnstone	
		Black-headed Gull	
		Wetlands & Waterbirds	

12.10. Potential impacts have been outlined in Section 11.2 of the NIS, to include:

- Accidental pollution incidents during construction
- Fugitive liquid emissions into the SACs and SPAs in Dublin Bay

12.11. Mitigation measures have been outlined to address these impacts which includes the preparation of an Outline Construction Management Plan (OCMP), to be implemented during the construction phase of development (Section 11.3 of NIS). This plan covers all potentially polluting activities and includes mitigation measures for elements such as storage and handling of harmful materials. Other specific mitigation measures include, *inter alia*

- Measures to prevent the release of sediment over baseline conditions to the Naniken Stream and subsequently to the Tolka Estuary and Dublin Bay incl inter alia use of silt traps, silt fences, settlement ponds
- Provision of exclusion zones and barriers
- Provision of temporary construction surface drainage and sediment control measures
- Prevailing weather and environmental conditions will be taken into account
- Storage of fuels and chemicals in bunded area
- Emergency procedures and availability of spillage kits

12.12. It is concluded in the NIS that the mitigation measures outlined above, when implemented, will ensure that no adverse effects on the European sites will arise from the proposed development as a consequence of run-off of sediment/silt or contaminated waters entering the Naniken Stream during the construction stage of the proposed development. In-combination effects of construction-related surface water discharges has been examined in Section 12.2 of the submitted NIS. While it is acknowledged that there is potential for cumulative impacts to water quality within relevant European sites arising from construction-related potential impacts identified above, it is stated that the mitigation measures put forward will fully address these potential impacts. Having examined the information before me, I am satisfied that the mitigation measures to be put in place will ensure that the conservation objectives and integrity relating to the Natura 2000 sites identified above and that they will not be adversely affected by construction-related surface water discharges from the proposed development. I consider that the proposed mitigation measures are clearly described, are reasonable, practical and enforceable. I also consider that they fully address the potential impacts arising from the proposed development such that it will not give rise to significant impacts either alone or in combination with other potential impact sources.

12.13. The Qualifying Interests for the relevant SPAs for which it is not possible to exclude, are summarised as follows:

Table 13:

North Bull Island SPA	S. Dublin Bay & River Tolka Est. SPA	Baldoyle Bay SPA	Malahide Estuary SPA	Rogerstown Estuary SPA
Light-bellied Brent Goose Shelduck Teal Pintail Shoveler Oystercatcher Golden Plover Grey Plover Knot Sanderling Dunlin Black-tailed Godwit Curlew Redshank Turnstone Black-headed Gull Wetlands & Waterbirds	Light-bellied Brent Goose Oystercatcher Ringed Plover Grey Plover Knot Sanderling Dunlin Bar-tailed Godwit Redshank Black-headed Gull Roseate Tern Common Tern Arctic Tern Wetlands & Waterbirds	Light-bellied Brent Goose Shelduck Ringed Plover Golden Plover Grey Plover Bar-tailed Godwit Wetland and Waterbirds	Light-bellied Brent Goose Great Crested Grebe Shelduck Pintail Goldeneye Red-breasted Merganser Oystercatcher Golden Plover Grey Plover Knot Dunlin Black-tailed Godwit Bar-tailed Godwit Redshank Wetland and Waterbirds	Light-bellied Brent Goose Greylag geese Shelduck Shoveler Oystercatcher Ringed Plover Grey Plover Knot Dunlin Black-tailed Godwit Redshank Wetlands and Waterbirds

12.14. In the case of the five SPAs listed above, the potential impacts of the proposed development are identified as such that it will result in the loss of St. Paul's as an ex-situ feeding site for the population of Light-bellied Brent Geese currently using it.

This may result in a reduction in the proportion of the existing foraging habitat in the Dublin area available to Light-bellied Brent Geese, which is a finite resource and may impact on existing terrestrial food supply in the Dublin area. This in turn could adversely affect the achievement of the conservation objectives “to maintain the favourable conservation condition”. St. Paul’s is an ex situ feeding site for all of the five European Sites detailed above. Any reference to Brent Geese within this report refers to Light-Bellied Brent Geese.

12.15. The submitted NIS states that the overall potential network of inland feeding habitat for Brent Geese in Dublin has been defined as all the identified known inland feeding sites, of which there are stated to be 132. This figure excludes the application site but includes the 16 sites previously described as potential sites where Brent goose droppings were noted, together with all the potentially suitable inland feeding sites of which there are 29. This suggests that there are potentially 161 inland feeding sites, which encompass the overall potential inland feeding habitat network for Brent Geese in Dublin, 29 of which do not appear to be currently utilised. This figure is recognised as being significantly greater (approximately 22%) than the 132 sites which encompass the current known foraging network of Brent Geese in the Dublin area.

12.16. Section 10 of the submitted NIS lists a summary of the overall results of the assessment, which may be further summarised as follows:

- The long-term mean population of Light-bellied Brent Geese in Ireland has increased by 4.68% over the period from 1995/1996 to 2009/2010;
- The long-term population trend of Light-bellied Brent Geese at each for the five relevant European sites is increasing over the periods surveyed;
- A greater number of Light-bellied Brent Geese were recorded roosting in North Bull Island SPA in 2017 compared to the average number of geese recorded roosting at the same site in 2016;
- The highest peak count recorded at St. Paul’s during the 2016-2017 season was 1,530 Brent Geese, compared to 820 geese during the 2015-2016 season;

- Light-bellied Brent Geese were recorded at 29 of the 41 sites (including St. Paul's) surveyed in January-March 2016 and at 54 of the 94 sites (including St. Paul's) surveys during the 2016-2017 season;

12.17. The NIS continues by stating that based on all available data (over the period of November 2005 to April 2017), Light-bellied Brent Geese have been recorded

- at a total of 116 terrestrial inland feeding sites (including St. Paul's) in Dublin City and its environs;
- at 64 sites during the 2016-2017 season, 73 sites during the 2015-2016 season, 52 during the 2014-2015 season, 58 during the 2013-2014 season and 72 sites during the 2012-2013 season. This suggests variation in the usage of sites by Brent Geese from season to season and that the current network of 132 known sites may not be fully utilised by the geese;
- 8 sites have been considered to be of major importance for Light-bellied Brent Geese (*i.e.* a peak count of 401+ birds) over the last five consecutive seasons. These sites, which include St. Paul's, may be described as the most important *ex-situ* sites within the existing network of known inland feeding sites;
- The distance to other nearby known inland feeding sites (*i.e.* the network of inland feeding sites), the average sward height, percentage of bare ground/ grass cover at a site are important factors in determining the usage of a site by Brent Geese.

12.18. I have examined all of the information before me in this regard, including submissions received from observers, (some of which are detailed in nature); submissions received from prescribed bodies; together with the reports of the Chief Executive of the planning authority and that of the Department of Culture, Heritage and the Gaeltacht. The Department report states that the Brent goose population listed for North Dublin Bay SPA is now reliant, to a large degree, on the availability of suitable grassland feeding resources within the Dublin area outside of the SPA network. It continues by stating that in order for a particular area to be a potentially suitable feeding resource for Brent Geese, the overall size of the grassland site, the degree of fragmentation of the grassland resource caused by the presence of

internal boundaries/vegetation, the quality and management of the grassland sward, relatively low levels of anthropogenic disturbance and its proximity to the SPA and other alternative feeding areas all need to be at suitable levels. The extent of potentially suitable feeding areas within Dublin city is finite and that the currently recognised feeding sites that are considered to be an alternative to the lands at St. Paul's may currently be experiencing pressures, including recreational disturbances that may limit their capacity to accommodate the loss of such a resource likely to occur as a result of the proposed development.

12.19. The importance of St. Paul's within the network of inland feeding sites is acknowledged. During the 2015-2016 season, Light-bellied Brent Geese were recorded at St. Paul's 74% of the time, with this figure increasing to 91% of the time during the 2016-2017 season. However, it is acknowledged that this is not the only ex-situ feeding site in the Dublin area. The current known network of inland feeding sites, excluding St. Paul's, is detailed as being 132, which comprises 116 known sites plus 16 sites previously described as potential where Brent Geese droppings were noted during surveys. In addition to this, 29 sites have been identified as potentially suitable feeding grounds, which brings the overall potential network of feeding habitat for Brent Geese to 161 feeding sites. These additional 29 sites do not appear to be utilised presently by the Brent Geese.

12.20. It is acknowledged that of all the inland feeding sites, the site with the highest peak count during Jan-Mar 2017 surveys was St. Paul's, with 1530 no. birds recorded on 24th Feb 2017. This peak count was significantly higher than the peak count recorded at the same time during 2016 surveys, namely 816 birds. While this is significant, it is noted that based on the all-day surveys undertaken in Jan-March 2017, St. Paul's is not the only site considered to be of major importance for Brent Geese. It is stated to be one of 15 such sites of major importance for Light-bellied Brent Geese, namely 401+birds, while eight sites have been considered to be of major importance for them over the last five consecutive seasons. The data before me demonstrates that the Light-bellied Brent Geese appear to use a network of numerous inland feeding sites across Dublin, which includes St. Paul's but is not exclusive to it. The closest site utilised by North Bull Island SPA ringed birds is St. Anne's Park, which is located directly west of the European site, while the furthest site is Ballyfermot/Le Fanu Park located c. 13.8km west of the European site.

12.21. In order to grant permission, the competent authority, in this instance An Bord Pleanála must conclude, having conducted the Stage 2 AA that the proposed development will not have an adverse effect on the integrity of any identified European sites. The conservation objective “population trend” for all five sites is for the long-term population trend to be stable or increasing. It is shown within the NIS that the long-term trend is in line with this conservation attribute as the long-term population trend is increasing for all five sites. The conservation objectives attribute of “distribution” for all five sites is “no significant decrease in the range, timing and intensity of use of areas by...”... “other than that occurring from natural patterns of variation”. Light-bellied Brent Geese distribution was shown to be such that they currently utilise a large network of known sites across the Dublin area to varying degrees. The number of sites where they have been recorded over the last five years varies from 52-73 suggesting that the current network of 132 sites may not be fully utilised by them and there may be unused capacity within the network to absorb for the loss of St. Paul’s and to support the increasing populations within the five designated sites.

12.22. The NIS states that if St. Paul’s were lost, it is possible that they would feed elsewhere on other known sites to a greater intensity than previously, suggesting that there will be no significant decrease in intensity of sites utilised by Brent Geese. In addition, it is noted within the NIS, as detailed above, that 29 additional sites have been identified within short distances of the current known network which are considered to be potentially suitable as feeding grounds and it is possible that they may utilise these potential sites into the future, thereby resulting in no potential impact on the current population trend or range of sites for Light-bellied Brent Geese. Based on all of the above it was determined within the NIS that there would be no impact on the population trend of this SCI at any of the five relevant European sites.

12.23. It is acknowledged within the NIS that the loss of St. Paul’s as an existing ex-situ inland feeding site of major importance for Light-bellied Brent Geese may act in combination with the existing and future potential loss of other known inland feeding site(s), and in particular the loss of any known site(s) of major importance, in the Dublin area. This is addressed in Section 12 of the submitted NIS, which states that 83% of all known and potential sites have a zoning objective that generally corresponds to ‘open space and amenity’. In likelihood, this translates that there is

potential for development on the remaining 17% (28 sites). Sites with planning permission granted or pending were examined, with 29 such sites identified. With 11 of these sites, there is potential for the proposed projects to act in-combination with the proposed development at St. Paul's and may result in loss of amenity grassland habitat which either is, or has the potential to be used by Light-bellied Brent Geese as inland foraging habitat. However, only one of the sites which may be lost due to development has no known or potential sites located within specified distance buffers while on average the other sites proposed for development have two known sites with the specified buffer distance. Accounting for this in-combination effect on the overall potential network of inland feeding habitat in the Dublin area, I note that the number of sites remaining is greater than the 132 sites previously known to be part of the foraging network in the Dublin area. The availability of these potential sites should ensure that there will be adequate capacity in the potential network to absorb the loss of St. Paul's in-combination with the potential loss of the other 11 inland feeding habitat sites.

12.24. I note all of the information submitted in relation to this matter and acknowledge that habitat loss and degradation are the most serious threats to the conservation of wild birds. I note that the development site is not located within a designated area. The proposal does not result in any loss of area of a designated site. There will be no direct loss to the species of Brent Geese or any other species as a result of the proposed development. I note the zoning objective for the site, as set out in the adopted City Development Plan and the fact that the preparation of this Plan was informed by both Strategic Environmental Assessment and Appropriate Assessment, which were undertaken as a parallel process in tandem with the development of the Plan. At the end of that process, the Plan was adopted with a Z15 zoning objective for this site, under which residential development is 'open for consideration'.

12.25. The proposal, if permitted, is such that it will result in the loss of St. Paul's as an ex-situ feeding site for the population of Light-bellied Brent Geese currently using it. This appears to be accepted by all parties. The key question arising is whether or not the proposed development will have an adverse effect on the integrity of any identified European sites and this is where a differing of opinion arises between the parties involved. I have examined the information and on balance, I note that the

current known network of such inland feeding sites at 132 no. is relatively substantial given the relatively small distances involved within the Dublin area. This figure does not include for potential sites, of which there are 29 identified. Nor does it account for any possible, as yet unknown sites that may be utilised into the future. It appears that these 29 sites are not currently used by the geese for feeding. Dublin is a relatively small city by global standards and these sites are all located in relatively close proximity to each other within the Dublin area. I note that St. Paul's is acknowledged to be one of the most important ex-situ sites within the existing network of known inland feeding sites, however it is also noted that it is one of 15 such sites of major importance for Light-bellied Brent Geese in the Dublin area, with 8 such sites identified to be of similar status over the last five consecutive seasons. The mean population of Light-bellied Brent Geese is shown to be increasing in Ireland, with this is reflected in the population trend at the five relevant sites. This does not mean to say that one may become complacent, however it is a positive. Evidence is shown for variation in the usage of sites from season to season, that the geese use the network of feeding sites to varying degrees and the information provided shows that the current network of 132 inland feeding sites may not be fully utilised by them.

12.26. I note the land-use zonings pertaining to the 161 sites (known and potential) and note that 83% of these are stated to generally correspond to that of 'open space and amenity', where there is generally a presumption against development on such sites. I note the lands which have the potential to be developed into the future, in particular the lands zoned for institutional use, but each application will be assessed on its own merits at that time. I also acknowledge the protective policies in the Development Plans of the four relevant planning authorities. I note the cumulative impacts outlined, in-combination with other plans and projects and I consider the information contained within the submitted NIS to be reasonable.

12.27. The numbers of inland feeding areas are relatively significant, the geese appear to be thriving based on their increasing population and I consider that the loss of this site as a feeding ground will not adversely impact on the conservation objectives of any of the five designated sites. In light of this assessment, I am of the opinion that there is capacity for the existing ex-situ inland feeding areas to absorb the loss of St. Paul's and I consider it reasonable to conclude on the basis of the information on the

file, which I consider adequate in order to carry out a Stage 2 Appropriate Assessment, that the proposed development, individually or in combination with other plans or projects would not adversely affect the integrity of the five relevant European sites, in view of their Conservation Objectives.

13.0 Environmental Impact Assessment

13.1. Statutory Provisions

13.1.1. This application was submitted to the Board after 16th May 2017, the date for transposition of Directive 2014/52/EU amending the 2011 EIA Directive. The Directive has not, however, been transposed into Irish legislation to date. In accordance with the advice on administrative provisions in advance of transposition contained in Circular Letter PL1/2017, it is proposed to apply the requirements of Directive 2014/52/EU.

13.1.2. The application was accompanied by an Environmental Impact Assessment Report (EIAR), which is mandatory for the development in accordance with the provisions of Part X of the Planning and Development Act 2000 (as amended) and Schedule 5 of the Planning and Development Regulations 2001-2015. Item 10 of Part 2 of Schedule 5 provides that an EIA is required for infrastructure projects comprising of:

(b) (i) Construction of more than 500 dwelling units

The development proposes 536 no. dwellings (104 no. houses and 432 no. apartments).

13.1.3. The EIAR contains one volume and includes a Non-Technical Summary. Chapters 1, 2 and 3 set out an introduction to the project, methodology used, description of the proposed development and alternatives considered. The likely significant direct and indirect effects of the proposed development are considered in the remaining chapters which collectively address the following headings, as set out in Article 3 of the EIA Directive 2014/52/EU:

- Population and human health
- Biodiversity, with particular attention to the species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC
- Land, soil, water, air and climate

- Material assets, cultural heritage and the landscape;
- The interaction between the factors referred to in points (a) to (d).

13.1.4. I am satisfied that the information contained in the EIAR has been prepared by competent experts and complies with article 94 of the Planning and Development Regulations 2000, as amended and the provisions of Article 5 of the EIA Directive of 2014.

13.1.5. I have carried out an examination of the information presented by the applicant, including the EIAR, and the submissions made during the course of the application. A summary of the submissions made by the planning authority, prescribed bodies and observers has been set out above.

13.2. Alternatives

13.2.1. Article 5(1)(d) of the 2014 Directive requires:

“a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment”.

13.2.2. Annex (IV) of the Directive provides that more guidance on reasonable alternatives as follows:

“A description of the reasonable alternatives (for example in terms of project design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects”.

13.2.3. Section 2.9 in Chapter 2 of the EIAR deals with the issue of alternatives. The EIAR sets out that having regard to the zoning objective of the lands in question, in which residential development is ‘open for consideration’ it was not considered necessary to consider alternative sites for the proposed development. In terms of alternative designs, it is set out that the proposals were the subject of detailed discussions with all the relevant authorities prior to the finalised scheme being prepared. Several iterations of the site layout and alternative designs were considered, with key design changes arising following the lodgement of the SHD pre-application to An Bord

Pleanála. Examples of previous iterations are included. The consideration of alternate processes is not considered relevant to the EIAR having regard to the nature of the proposed development.

13.2.4. I am satisfied that the EIAR has provided a description of the reasonable alternatives studied by the applicant which are relevant to the proposed project.

13.3. Likely Significant Direct and Indirect Effects

13.3.1. The likely significant direct and indirect effects of the proposed development are considered under the following headings, as set out in Article 3 of the EIA Directive 2014/52/EU:

- Population and human health
- Biodiversity, with particular attention to the species and habitats protected under Directive 92/43/EEC and Directive 2009/147/EC
- Land, soil, water, air and climate
- Material assets, cultural heritage and the landscape;
- The interaction between the factors referred to in points (a) to (d).

13.3.2. Population and Human Health

Chapter 1 of the submitted EIAR deals with population and human health. The assessment provided by the applicant indicates that the proposal will bring new population into the area, who will support existing schools, shops, transport and the local community. Additional facilities will be supported in the area. It is considered that the effects for population and human health will be moderate, positive and long term. No long-term negative environmental effects are envisaged.

The mitigation measures proposed within the EIAR are such that will reduce the potential for any temporary direct and indirect effects on human health during the construction stage in particular e.g. noise, dust abatements etc. This is considered acceptable.

I have considered the written submissions made in relation to population and human health. I am satisfied that they have been appropriately addressed in terms of the application and the information submitted by the applicant and that no

significant adverse direct, indirect or cumulative effects on population and human health are likely to arise.

13.3.3. Biodiversity

Chapter 2 of the submitted EIAR deals with biodiversity. A biodiversity impact appraisal of the proposed development was undertaken by Scott Cawley Ltd, which included for desk study, field surveys including bat activity surveys from 2015 to 2017 and bird surveys. Screening for Appropriate Assessment was also undertaken, which resulted in a Stage 2 Assessment and the submission of an NIS. This has been dealt with comprehensively above and I do not intend to repeat issues in this section that have been previously dealt with.

The proposed development is not located in a designated site. There are 16 European site located within 15km and 6 proposed NHAs within 5km of the subject site. The Naniken Stream is located approximately 100m north of the subject site. No protected or rare flora species were recorded on site, and 1 invasive species was noted. Potential impacts on habitats, mammals and birds during construction and operational phase were identified, together with potential cumulative impacts. Mitigation and monitoring is dealt with in Section 5.5 of the EIAR.

Bat activity was recorded on site, with the majority recorded around the boundaries with St. Anne's Park. The proposed buildings and associated lighting is likely to result in some localised impacts to bats commuting through or feeding on the site. It is likely that they will still be able to pass through the site albeit via different routes to those currently used. Details of proposed tree removal have been included with the application, primarily trees that are considered to be in poor condition. Temporary light required during construction is also identified as a potential impact. A lighting plan has been prepared and the predicted light levels along the southern and eastern boundaries, where a high degree of foraging was recorded are less than 1 lux. It is also recommended that three bat boxes be erected on mature trees either on site or immediately adjacent, if possible. Mitigation Measures No. 4 and 5 deal specifically with measures to reduce impacts on bats relating to tree removal and lighting.

Following implementation of the mitigation measures, no significant residual impacts are anticipated.

I note the location of the site within the built-up area of Dublin city, in an established area where good services and facilities are available. As the population of the city increases, increasing demands are made on the existing green spaces and habitats. It is important that these natural areas, together with their associated ecological network, are managed and developed in a way that protects and enhances its natural heritage and landscape. However, in my opinion a balance must be struck between the need to appropriately develop a dynamic city, whilst at the same time protecting the natural environment. A balance needs to be struck between protecting the geese and other qualifying species while at the same time, not having the human population commuting for hours into the city from the far reaches of the GDA due to a lack of housing within the city boundary.

I have considered the written submissions made in relation to biodiversity. I note the designations pertaining to the general area, including the UNESCO Biosphere designation for Dublin Bay. I am satisfied that they have been appropriately addressed in terms of the application and the information submitted by the applicant and that no significant adverse direct, indirect or cumulative effects on biodiversity are likely to arise.

13.3.4. Land and Soils

The site topography is generally level and the ground falls away gradually to the east through St. Anne's Park. The site is underlain with shallow depth of made ground, which was reworked to form suitable playing pitch surfaces. The subsoil comprises Dublin Boulder Clay, which is impermeable and is the dominant subsoil type in the region. This is essentially a greenfield site. There are no known potential contamination sources in the site or adjacent sites. There are no expected pollutant linkages associated with the construction or operation phases of the development. Depth to bedrock is over 8mBGL and bedrock comprises Calp Limestone. Changes in groundwater flow regime are not expected. The bedrock aquifer was not

encountered during site investigations and will not be impacted by the proposed development.

While the scale of the project is considered significant in terms of numbers of housing units, the land take for the proposed is considered relatively small.

The construction phase holds the highest number of activities which could potentially impact on the geological environment, primarily pertaining to excavation and infilling activities required to construct basement carpark and raise site levels, with slight negative effects acknowledged. The operational phase has few activities which would constitute a risk to soil, geological or hydrogeological environment. This phase will not give rise to any likely significant long term effects albeit there will be a land change from use of playing pitches to residential. It is considered that the overall cumulative development in the area will be imperceptible when the mitigation measures are taken into account, assuming that significant mitigation measures are in place for this and each of the developing sites.

The development would take place in three distinct phases over a 36 month period. Phases may run concurrently to reflect the overall development timeline.

Mitigation measures are proposed within Section 6.5 for construction phase only. There is limited to no potential for site activities to impact on geological environment for the area during the operational phase.

I have considered all of the submissions made in relation to land, soil and geology. I am satisfied that potential adverse direct, indirect or cumulative effects on land, soil and geology have been appropriately addressed in terms of the application and the information submitted by the applicant and that no significant adverse direct, indirect or cumulative effects are likely to arise.

13.3.5. Hydrology and Water

Section 7.0 of the EIAR deals with this topic. The existing site is currently greenfield and as such, there are no existing service connections associated with the existing site area. The closest services are located along Sybil Hill Road and serve existing dwellings and developments along that roadway. A Pre-Connection Enquiry Application was submitted to Irish Water and they indicated that a connection to the Irish Water network can be facilitated. Surface water currently naturally infiltrates to ground and runs-off to an existing watercourse in line with existing topography of the

site. The site lies within the catchment of the Naniken Stream, located north of the existing site, which ultimately discharges to Dublin Bay. There are flooding issues in the existing public surface water network downstream of the proposed site. All surface water from the proposed development will discharge to the Naniken Stream and not to the public sewer network, as directed by Dublin City Council. Information available from the EPA suggests that the Naniken Stream is “at risk of not achieving good water status” in terms of the WFD.

The completed residential development will result in an increased demand for potable water in the order of 271.35 cubic meters per day, with this demand being taken from an existing public water main along Sybil Hill Road. This additional demand can be catered for in the existing network. The completed residential development will result in an increased discharge of foul water in the order of 321.6 cubic meters per day, which will discharge into the existing public foul water sewer on Sybil Hill Road. The completed residential development will result in an increased discharge of surface water but it will be attenuated below greenfield levels in accordance with the GSDS. This flow will be discharged to the Naniken Stream and ultimately into Dublin Bay.

The proposed development will not give rise to any likely significant long-term effects. Slight negative effects will be experienced during the construction phase with disruptions to supply caused by local connections which will be temporary in nature. During the operational phase there will be no significant environmental effects.

Mitigation measures are outlined within Section 7.7. It acknowledged that the completed potable water network will not require further mitigation measures upon completion. The same applies after completion of the foul sewer network, other than normal maintenance of the foul sewer system.

I have considered all the submissions made in this regard. I am satisfied that potential adverse direct, indirect or cumulative effects on hydrology and water have been appropriately addressed in terms of the application and the information submitted by the applicant and that no significant adverse direct, indirect or cumulative effects are likely to arise.

13.3.6. Air Quality and Climate

Chapter 8 of the EIAR deals with Air Quality and Climate. It is recognised that the most significant interactions are between air quality and human beings. An adverse impact in either the construction or operational phase has the potential to cause health and dust nuisance issues. The mitigation that will be put in place will ensure that the impact of the development complies with all ambient air quality legislation and therefore the predicted impact is long term and neutral with respect to human beings. The interaction between traffic and air quality are not significant and levels of traffic-derived air pollutants will not exceed the ambient air quality standards with the proposed development in place. Interactions between air quality and flora, fauna and water are neutral for both construction and operational phases. The flood risk represented by ground water is negligible and no further mitigation is required. Cumulatively, levels will still be significantly within the ambient air quality limit values under all scenarios. In terms of mitigation, it is stated that construction phase dust monitoring should be put in place, in the form of a Dust Minimisation Plan, to ensure dust mitigation measures are controlling emissions. There is no proposed monitoring for the operational phase of the development with respect to air quality or climate.

I have considered all the written submission received in relation to this topic. I am satisfied that they have been appropriately addressed in terms of the application and the information submitted by the applicant and that no significant adverse direct, indirect or cumulative effects are likely to arise.

13.3.7. Noise and Vibration

Chapter 9 of the EIAR deals with Noise and Vibrations. An environmental noise survey was conducted at the site in order to quantify the existing noise environment. Three measurement locations were selected- N1 outside Sybil Hill House, in proximity to The Meadows; N2 in proximity to St. Paul's College campus and N3 within existing playing fields of St. Anne's Park. In terms of establishing baselines measurements, I am satisfied that these locations would be reflective of the more sensitive locations. The measurements were taken between 14.15 and 17.35 on October 14th, 2014. The baseline environment within and adjacent to the development site is found to be typical of a suburban environment.

Potential impacts during construction phase will be moderate and short-term affecting a small number of noise sensitive locations. There is potential for the adopted criteria to be exceeded when demolition works are taking place, however a schedule of best practise noise mitigation measures are included. Potential for vibration impacts during construction phase programme are likely to be limited given the minimal level of ground breaking and excavations required. There are no expected sources of vibration associated with the operational phase. Once development is completed the potential noise impacts to surrounding environment are minimal. Cumulative noise impacts associated with traffic generated from other development in the surrounding environment have been assessed and the overall impact is deemed to be long term and not significant. Residual impacts during construction phase will be short term moderate while during operational phase will be neutral, long term and not significant. Mitigation and monitoring is outlined in Section 9.6, which includes a designated noise liaison officer appointed to site during construction works.

I have considered all the written submission received in relation to this topic. I am satisfied that they have been appropriately addressed in terms of the application and the information submitted by the applicant and that no significant adverse direct, indirect or cumulative effects are likely to arise.

13.3.8. Landscape and Visual Amenity

Chapter 10 of the EIAR deals with landscape and visual amenity. Photomontages were prepared to represent the physical and visual nature of the proposed development. Twelve locations were selected and I consider these locations to give an appropriate and reasonable reflection of the impacts of the proposed development on the landscape and visual amenity of the area.

There are no specific landscape designations pertaining to the subject site and the proposed development is considered to be consistent with the Z15 zoning objective for the site. While adjoining St. Anne's Park, the site is separate from the park and is generally well screened. The layout of the development has proposed taller apartment buildings to the north of the site away from the Avenue, with the 2/3 storey housing located to the south. The proposed development is stated to respond positively to the landscape, green infrastructure and related policies and objectives

of the operative Dublin City Development Plan. Effects during construction may arise from a number of activities but landscape and visual construction effects will be of a localised short term nature, primarily affecting views from St. Paul's College, Sybil Hill House and from the rear of properties in The Meadows. Such effects will be moderate negative and short-term. During the operational stage, it is considered that the proposed development will not give rise to significant landscape or visual impacts.

In terms of the Avenue to St. Anne's Park, it is stated that for the most part the development will not be visible from the Avenue by virtue of its mature evergreen tree-lined linear nature and there will be no adverse impact. I consider that this impact is somewhat under-estimated. I do however consider that with mitigation, the views will be lessened. In any event, I consider that views of the development, as proposed from the Avenue are not necessarily a negative. I concur that as the development and mitigation planting matures, impacts on the immediate vicinity of the site boundary would be neutral in the longer-term. In my opinion, there will be an imperceptible impact on St. Anne's Park Rose Garden or the Millennium Arboretum. The main impact on Sybil Hill Road will be as a result of modifying the existing entrance, with the impact being localised and slight in nature. The proposed development will not be visible from the vicinity of the entrance to St. Anne's Park from Sybil Hill Road. The impact will be imperceptible and neutral. This is also the case for properties fronting onto All Saint's Road. The impacts on both St. Paul's College and The Meadows will be moderate to significant and negative. This is due to the permanent alteration of the existing open landscape. For the most part, the proposed development will be fully screened and will not give rise to impacts on Sybil Hill House. Detailed mitigation measures are set out in Section 10.5 of the EIAR.

I have considered all of the written submissions made in relation to landscape and visual impacts. I have also undertaken a detailed assessment of the matter in the main assessment above. I am satisfied that they have been appropriately addressed in terms of the application and the information submitted by the applicant and that no significant adverse direct, indirect or cumulative effects are likely to arise.

13.3.9. Cultural, Archaeological and Architectural Heritage

Chapter 11 of the submitted EIAR deals with the topic of cultural, archaeological and architectural heritage. There are no Record of Monuments and Places (RMP) within or on close proximity to the subject site. A total of 25 RMP sites are located within a 2km radius of the site. In addition, there are no Monuments or sites under Preservation Orders within or in proximity to the proposed development. Sybil Hill House is designated as a Protected Structure (Ref. 7910) in the Dublin City Record of Protected Structures. There are no Protected Structures within the application site and no part of the site lies within an architectural conservation area. The gardens of Sybil Hill House (DU-50-O-203374) and St. Anne's Park (DU-50-O-217373) are stated by the applicants to be listed in the National Inventory of Architectural Heritage, as yet unpublished. St. Anne's Park is a Conservation Area, it is not an Architectural Conservation Area.

None of the boundaries of the application site are of historical significance other than the brick-faced wall on the northern boundary, which is the surviving northern wall of the walled garden associated with Maryville. The mode of construction is typical of garden walls of the period. The site of Maryville House, an Architectural Heritage Site (AH1) occupies much of the north-western extent of the proposed site area. No surface trace of Maryville House and garden was evident during field inspection, with the exception of one length of wall.

A total of four heritage sites- three of Architectural Heritage and one area of Archaeological Potential- were identified as being impacted by the proposed development. Sites of identified Architectural Heritage significance are Maryville (Site AH1), Sibylhill (AH2) and the entrance avenue to St. Anne's Park (Site AH3). The one impacted Area of Archaeological Potential is the boundary between Maryville townland and Sibylhill townland (AP1) which may preserve a Gaelic *tuath* territorial boundary. This boundary forms the western boundary of the proposed development.

The impact on Maryville (AH1) will be a significant direct impact, which will be permanent in duration. The property was demolished in 1959 with the entrance avenue demolished at a later date to make way for residential development. The proposed development will potentially have a direct impact on sub-surface

architectural or archaeological features or material at the site. However, the opportunity to retrieve information on the demolished Maryville House and to preserve the relict elements of its demesne landscape in situ is considered a positive impact. It is stated that when mitigation measures are taken into consideration, the level of impact reduces to moderate.

There would be no direct impacts on the built heritage of Sybil Hill House (AH2) and no cumulative impacts, with slight effects on its setting. There would be no direct or cumulative impacts on the Conservation Area of St. Anne's Park, with moderate effects on its setting (AH3).

The impact on the Archaeological Heritage townland boundary (AP1) will potentially be negative, permanent in duration and significant. However, it is noted that when recommended mitigation measures are taken into consideration, the level of potential impact reduces to moderate.

Mitigation measures are set out in Section 11.5.4, which include for the protection/retention of the brick faced wall if possible, followed by Recommendations Prior to/During and Post Construction.

I have considered all of the written submissions made in relation to this topic. I refer the Board to my main assessment above, which deals with some of the issues raised, together with the reports of DAU and Chief Executive Report of the planning authority in this regard. I am satisfied that the identified impacts would be avoided, managed and mitigated by the measures which form part of the proposed scheme, the proposed mitigation measures and through suitable conditions. I am therefore satisfied that the proposed development would not have unacceptable direct, indirect or cumulative impacts in terms of cultural, archaeological and architectural heritage.

13.3.10. Material Assets: Roads and Traffic, Transportation and Site Services

Chapter 12 of the EIAR deals with the topic of material assets: roads and traffic, transportation and site services. The proposed development will not give rise to any likely significant long term impacts or effects. Slight negative impacts will be experienced during the construction phase with construction traffic on the local road network and with disruptions to water supply caused by local connections, which will be temporary in nature. Existing demands for potable water can be catered for in the network. The impact of the proposal in the existing foul drainage system will be to

increase the quantity and rate of discharge to the existing foul sewer system, while the impact of the proposal on existing surface water network will be to maintain the level of discharge below existing greenfield levels. Mitigation is dealt with under Section 12.5 of the EIAR.

I have considered all of the written submissions made in relation to this topic. I refer the Board to my main assessment above, which deals with some of the issues raised, together with the report of Chief Executive Report of the planning authority in this regard. I am satisfied that they have been appropriately addressed in terms of the application and the information submitted by the applicant and that the proposed development would not have unacceptable direct, indirect or cumulative impacts in terms of material assets: roads and traffic, transportation and site services.

13.3.11. Interaction between Environmental Factors

Chapter 13 of the submitted EIAR deals with interactions between environmental factors. It states that interactions between various disciplines have been taken into considerations in the preparation of the document and each of the specialist consultants liaised with each other and dealt with likely interactions between effects predicted as a result of the proposed development during the preparation stage and ensured that appropriate mitigation measures are incorporated into the design process. A specific section on interactions has been included in each of the environmental topic chapters of the EIAR. I consider this approach to be satisfactory and that adequate consideration has been given to the interactions.

The primary interactions are summarised in the EIAR as follows:

- Human beings and air quality
- Air quality and traffic
- Air quality, flora, fauna and water
- Air quality, soil, geology and noise.

I have considered the inter-relationships between the factors and whether these might as a whole affect the environment, even though effects may be acceptable when considered on an individual basis. Most inter-relationships are neutral in impact when the mitigations measures proposed are incorporated into the design, construction or operation of the proposed development.

In conclusion, I am satisfied that effects arising can be avoided, managed and mitigated by the measures which form part of the proposed development, mitigation measures and suitable conditions. There is, therefore, nothing to prevent the granting of permission on the grounds of cumulative effects.

14.0 Conclusion and Recommendation

- 14.1. In conclusion, I consider the principle of residential development to be acceptable on this site. I note the Chief Executive report of the planning authority, which recommends a refusal of permission but which states they are not opposed to the delivery of high density residential development on part of these lands, subject to satisfactory resolution of the matters raised. I am of the opinion that this is a zoned, serviceable site within an established built-up, urban area where a wide range of services and facilities exist. I have no information before me to believe that the proposal, if permitted, would put undue strain on services and facilities in the area. The site forms part of a larger school complex, with the lands demonstrated to be surplus to their needs. The proposal will result in the loss of playing pitches to the school and the wider community. However, new community facilities are being provided, albeit of a different nature and the location of the site adjoining St. Anne's Park, with all the amenities and facilities it has on offer, is noted.
- 14.2. Having assessed the file, I am satisfied that the proposal will unduly impinge on the character or setting of either St. Anne's Park or Sybil Hill House, a Protected Structure. I am also satisfied that the proposal will not impact on the visual or residential amenities of the area, in particular the properties at The Meadows, to such an extent as to warrant a refusal of permission. The proposal will result in a loss to the ex-situ feeding grounds of Light-bellied Brent Geese. However, I am of the opinion that the proposed development, individually or in combination with other plans or projects would not adversely affect the integrity of the five relevant European sites, in view of their Conservation Objectives. Based on all of the information before me, I am satisfied that the existing feeding sites are not being used to their full potential; there is variation in usage and importantly, I believe that the loss of this site can be absorbed by the remaining 100 plus sites within the Dublin area.

14.3. I consider the proposal to be generally in compliance with both national and local policy, together with relevant section 28 ministerial guidelines. I also consider it to be in compliance with the proper planning and sustainable development of the area and having regard to all of the above, I recommend that permission is granted, subject to conditions.

15.0 Reasons and Considerations

16.0 Having regard to the following:

- (a) the site's location close to Dublin city centre, within an established built-up area on lands with zoning objective Z15, which seeks to 'protect and provide for institutional and community uses' in the Dublin City Development Plan 2016-2022
- (b) the policies set out in the Dublin City Development Plan 2016,
- (c) the Rebuilding Ireland Action Plan for Housing and Homelessness, (Government of Ireland, 2016),
- (d) the Design Manual for Urban Roads and Streets (DMURS) issued by the Department of Transport, Tourism and Sport and the Department of the Environment, Community and Local Government in March, 2013
- (e) the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009
- (f) the Guidelines for Planning Authorities on Sustainable Urban Housing: Design Standards for New Apartments, 2018
- (g) the Planning System and Flood Risk Management (including the associated Technical Appendices), 2009

- (h) the nature, scale and design of the proposed development,
- (i) the availability in the area of a wide range of social, community and transport infrastructure,
- (j) the pattern of existing and permitted development in the area,
- (k) the planning history within the area, and
- (l) the report of the Inspector and the submissions and observations received,

It is considered that, subject to compliance with the conditions set out below, the proposed development would constitute an acceptable residential density in this suburban location, would not seriously injure the residential or visual of the area, would not detract from the character and setting of St. Anne's Park or the nearby Protected structure, Sybil Hill House, would be acceptable in terms of urban design, height and quantum of development and would be acceptable in terms of pedestrian and traffic safety. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application, except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the Planning Authority, the developer shall agree such details in writing with the Planning Authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.

Reason: In the interest of clarity.

2. Prior to commencement of any works on site, revised details shall be submitted to and agreed in writing with the planning authority with regard to the following:

(a) Block 4 shall be reduced to a maximum of five storeys in height. Levels 05, 06 and 07 shall be omitted resulting in a total loss of 24 apartments, namely 6 x 1 bed; 15 x 2 bed and 3 x 3 bed units.

(b) Revised plans at an appropriate scale showing the number of on-street car parking spaces reduced for the proposed 104 houses to 1 space per house. This will result in a reduction of 52 car parking spaces for the house element. The number of car parking spaces shall be further reduced to reflect the reduction in the number of apartments permitted. A further 24 car parking spaces shall be omitted to address this reduction. The total number of car parking spaces permitted is 558 no.

(c) In the interests of clarity, the total number of units being permitted is 512 no. (408 no. apartments and 104 no. houses)

(d) Details regarding the opening hours of the access points between the development site and St. Anne's Park, which reflect the opening hours of St. Anne's Park

(e) Details regarding availability/opening hours of the proposed community uses within Block 1 and Block 6 to the wider public

(f) Details of protection and repair measures for the remaining section of the walled garden along the northern site boundary. This wall shall be retained and repaired, where possible and any demolition deemed necessary shall not be undertaken without the prior agreement of the planning authority

(g) Details of the proposed entrances from the street to the communal gardens to the rear of the proposed houses

(h) Details of upper floor terrace screening in the housing elements of the proposal

(i) Details of proposed roof finish to the apartment blocks

Reason: In the interests of proper planning and sustainable development, to safeguard the amenities of the area and to enhance permeability

3. Water supply and drainage arrangements, including the attenuation and disposal of surface water, shall comply with the requirements of the Planning Authority for such works and services. In particular:

(a) The surface water outfall pipe and headwall details to the Naniken River shall be agreed in writing with the planning authority prior to any works commencing on site. Additional details in relation to the scouring of the river channel or river banks shall be submitted for the written agreement of the planning authority

(b) Development shall not commence until the finalised alignment and details of surface water pipe are agreed in writing with the planning authority. The design and construction of the pipe will minimise impact on existing tree root zones and will include on-site supervision by a qualified Arboriculturist employed by the developer

and reporting to the panning authority. Following construction the alignment will be landscaped in accordance with the requirements of the planning authority

(c) Development shall not commence until requirements for demolition and reconstruction of the bridge with the proposed drainage outfall at the Naniken River are agreed with the Planning Authority

Reason: In the interest of public health and to ensure a satisfactory standard of development.

4. Mitigation and monitoring measures outlined in the plans and particulars, including the environmental impact assessment report submitted with this application shall be carried out in full, except where otherwise required by conditions attached to this permission.

Reason: In the interest of protecting the environment and in the interest of public health.

5. The period during which the development hereby permitted may be carried out shall be 5 years from the date of this Order.

Reason: In the interests of proper planning and sustainable development

6. The site shall be landscaped in accordance with the submitted scheme of landscaping, details of which shall be submitted to, and agreed in writing with, the Planning Authority prior to commencement of development. The developer shall retain the services of a suitably qualified Landscape Architect throughout the life of the site development works. The approved landscaping scheme shall be implemented fully in the first planting season following completion of the development or each phase of the development and any plant materials that die or

are removed within 3 years of planting shall be replaced in the first planting season thereafter.

Reason: In the interest of residential and visual amenity.

7. All trees and hedgerows within and on the boundaries of the site shall be retained and maintained, with the exception of the following:

(a) Specific trees, the removal of which is authorised in writing by the Planning Authority to facilitate the development

(b) Trees which are agreed in writing by the Planning Authority to be dead, dying or dangerous through disease or storm damage, following submission of a qualified tree surgeon's report, and which shall be replaced with agreed specimens.

Reason: In the interests of amenity, ecology and sustainable development

8. Retained trees and hedgerows shall be protected from damage during construction works. Within a period of six months following the substantial completion of the proposed development, any planting which is damaged or dies shall be replaced with others of similar size and species, together with replacement planting required under paragraph (b) of this condition. There will be no impact on trees within St. Anne's Park without the written agreement of the planning authority.

Reason: In the interests of amenity, ecology and sustainable development

9. A security bond to the value of €100,000 (one hundred thousand euro) shall be lodged with the planning authority, prior to the commencement of development, as security to ensure the appropriate protection and preservation of trees on the development site and St. Anne's Park. The form of the security bond shall be

agreed between the planning authority and the developer or, in default of agreement, shall be agreed to An Bord Pleanála for determination.

Reason: In the interest of amenity, ecology and sustainable development.

10. Details of the materials, colours and textures of all the external finishes to the proposed buildings shall be submitted to, and agreed in writing with, the Planning Authority prior to commencement of development.

Reason: In the interest of visual amenity.

11. No additional development shall take place above roof parapet level, including lift motor enclosures, air handling equipment, storage tanks, ducts or other external plant, telecommunication aerials, antennas or equipment, unless authorised by a further grant of planning permission.

Reason: To protect the residential amenity of property in the vicinity and the visual amenity of the area.

12. Site development and building works shall be carried only out between the hours of 07.00 to 18.00 Mondays to Fridays inclusive, between 08.00 to 14.00 on Saturdays and not at all on Sundays and public holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.

Reason: In order to safeguard the amenities of property in the vicinity.

13. The developer shall comply with all requirements of the planning authority in relation to roads, access, lighting and parking arrangements, including facilities for the recharging of electric vehicles. In particular:

(a) The roads and traffic arrangements serving the site (including signage) shall be in accordance with the detailed requirements of the Planning Authority for such works and shall be carried out at the developer's expense.

(b) The roads layout shall comply with the requirements of the Design Manual for Urban Roads and Streets, in particular carriageway widths and corner radii;

(c) Pedestrian crossing facilities shall be provided at all junctions;

(d) The materials used in any roads / footpaths provided by the developer shall comply with the detailed standards of the Planning Authority for such road works, and

(e) A detailed construction traffic management plan shall be submitted to, and agreed in writing with, the Planning Authority prior to commencement of development. The plan shall include details of arrangements for routes for construction traffic, parking during the construction phase, the location of the compound for storage of plant and machinery and the location for storage of deliveries to the site.

Reason: In the interests of traffic, cyclist and pedestrian safety and to protect residential amenity.

14. Prior to commencement of development, proposals for an apartment and house numbering scheme and associated signage shall be submitted to the planning authority for agreement.

Reason: In the interest of orderly development

15. Prior to commencement of development, the developer shall submit to and agree in writing with the planning authority a properly constituted Owners' Management Company. This shall include a layout map of the permitted development showing the areas to be taken in charge and those areas to be maintained by the Owner's Management Company. Membership of this company shall be compulsory for all purchasers of property in the development. Confirmation that this company has been set up shall be submitted to the planning authority prior to the occupation of the first residential unit.

Reason: To provide for the satisfactory completion and maintenance of the development in the interest of residential amenity.

16. All service cables associated with the proposed development (such as electrical, communal television, telephone and public lighting cables) shall be run underground within the site. In this regard, ducting shall be provided to facilitate the provision of broadband infrastructure within the proposed development.

Reason: In the interest of orderly development and the visual amenities of the area.

17. The developer shall facilitate the preservation, recording and protection of archaeological materials or features that may exist within the site. In this regard, the developer shall –

(a) notify the planning authority in writing at least four weeks prior to the commencement of any site operation (including hydrological and geotechnical investigations) relating to the proposed development,

(b) employ a suitably qualified archaeologist who shall carry out site testing and monitor all site investigations and other excavation works, following demolition, and

(c) provide arrangements, acceptable to the planning authority, for the recording and for the removal of any archaeological material which the authority considers appropriate to remove.

In default of agreement on any of these requirements, the matter shall be referred to An Bord Pleanála for determination.

Reason:

In order to conserve the archaeological heritage of the site and to secure the preservation and protection (in situ or by record) of any remains that may exist within the site

18. Prior to commencement of development, the applicant or other person with an interest in the land to which the application relates shall enter into an agreement in writing with the planning authority in relation to the provision of social and affordable housing in accordance with the requirements of section 96 of the Planning and Development Act 2000, as amended, unless an exemption certificate shall have been applied for and been granted under section 97 of the Act, as amended. Where such an agreement is not reached within eight weeks from the date of this order, the matter (other than a

matter to which section 97(7) applies) may be referred by the planning authority or any other prospective party to the agreement to the Board for determination.

Reason: To comply with the requirements of Part V of the Planning and Development Act 2000, as amended, and of the housing strategy in the development plan of the area.

19. Prior to commencement of development, a phasing programme for the development shall be submitted to the planning authority for agreement.

Reason: To provide for the orderly development of the site

20. No advertisement or advertisement structure shall be erected or displayed on the building (or within the curtilage of the site) in such a manner as to be visible from outside the site, unless authorised by a further grant of planning permission.

Reason: In the interest of visual amenity.

21. A plan containing details for the management of waste within the development, including the provision of facilities for the storage, separation and collection of the waste and, in particular, recyclable materials shall be submitted to, and agreed in writing with, the Planning Authority prior to commencement of development. Thereafter, the waste shall be managed in accordance with the agreed plan.

Reason: To provide for the appropriate management of waste, and in particular recyclable materials, in the interest of protecting the environment.

22. The construction of the development shall be managed in accordance with a Construction Management Plan, which shall be submitted to, and agreed in writing with, the Planning Authority prior to commencement of development. This plan shall provide a demolition management plan, together with details of intended construction practice for the development, including hours of working, noise management measures and off-site disposal of construction/demolition waste.

Reason: In the interests of public safety and residential amenity.

23. The developer shall pay to the Planning Authority a financial contribution under section 48 of the Planning and Development Act 2000 (as amended) and the Dublin City Development Plan 2016, in lieu of the provision of public open space. This contribution shall be paid prior to commencement of development or in such phase payments as the Planning Authority may facilitate

Reason: For the provision of improvements or enhancement of existing amenities in the local area given the 6.3% shortfall in public open space provision

24. The developer shall pay to the Planning Authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the Planning Authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the Planning Authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the Planning Authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms of the Scheme.

Reason: It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission.

Lorraine Dockery

Senior Planning Inspector

23rd March 2018

APPENDIX A- List of submissions received

300559 Sub - Abina O' Connell
300559 Sub - Adrienne Lonergan
300559 Sub - Aidan and Brideen Hickey
300559 Sub - Aidan Masterson
300559 Sub - Aidan O'Callaghan
300559 Sub - Aideen and Peter Roche
300559 Sub - Aideen Keane
300559 Sub - Aideen Leonard
300559 Sub - Aine Gallagher
300559 Sub - Aine McGroarty
300559 Sub - Aisling Dwane
300559 Sub - Aisling Keane
300559 Sub - Aisling Pierce
300559 Sub - Aislinn O'Rourke and Fintan McDonald
300559 Sub - Al O'Dowd
300559 Sub - Alan and Beryl Ward
300559 Sub - Alan and Laura Canavan
300559 Sub - Alan and Siobhan Foley
300559 Sub - Alan Bothwell
300559 Sub - Alan Coffey
300559 Sub - Alan Duffy
300559 Sub - Alan Keenan and Dee Tobin
300559 Sub - Alexandra Horhocea and Ronan Clarke
300559 Sub - Alicia Doyle
300559 Sub - Alison Gilliland
300559 Sub - Allison O Hara
300559 Sub - Ambrose and Cecilia Jameson
300559 Sub - An Taisce

300559 Sub - Andrew Bates and Eithne Brennan
300559 Sub - Andrew Croughan
300559 Sub - Angela Good
300559 Sub - Angela Leahy
300559 Sub - Angela O'Doherty
300559 Sub - Angela Tunney and Iain Atack
300559 Sub - Anita Behan
300559 Sub - Anita Evans
300559 Sub - Ann and David Charles
300559 Sub - Ann and Jim Madden
300559 Sub - Ann and Liam Quigley
300559 Sub - Ann and Tom Hamill
300559 Sub - Ann Brennan
300559 Sub - Ann Louise Mulhall
300559 Sub - Ann McCleary
300559 Sub - Ann O'Donovan
300559 Sub - Anna Collins
300559 Sub - Anna Logan
300559 Sub - Anna McDonald
300559 Sub - Anne Briody
300559 Sub - Anne Gallagher
300559 Sub - Anne Graham
300559 Sub - Anne Hynes
300559 Sub - Anne Kelly
300559 Sub - Anne Kennedy
300559 Sub - Anne Marie Costigan
300559 Sub - Anne Marie Dolan
300559 Sub - Anne Pierce
300559 Sub - Anne Ryan
300559 Sub - Anne Synnott

300559 Sub - Anne Woods
300559 Sub - Anne-Marie Madden
300559 Sub - Annette Billings
300559 Sub - Annette Foley
300559 Sub - Anthony Cerasi
300559 Sub - Anthony Cleary
300559 Sub - Anthony Gill
300559 Sub - Anthony Kelly
300559 Sub - Anthony Watkins
300559 Sub - Anthony Wills
300559 Sub - Antonia Mercer and John Fitzgerald
300559 Sub - Aodhan O'Riordain
300559 Sub - Aoife Coffey and Ciaran Weafer
300559 Sub - Aoife Henry
300559 Sub - Aoife Herbert
300559 Sub - Aoife McDermott
300559 Sub - Aoife Reddy
300559 Sub - Aoife Rogers
300559 Sub - Ashley Wallace
300559 Sub - Audrey Byrne
300559 Sub - Audrey Plunkett
300559 Sub - Austin Bolger
300559 Sub - Austin Peavoy
300559 Sub - Bairbre Fennelly
300559 Sub - Barbara and Mark Kelly
300559 Sub - Barbara Buchanan
300559 Sub - Barbara Cahill
300559 Sub - Barbara Hamilton
300559 Sub - Barbara Monahan
300559 Sub - Barbara Monahan

300559 Sub - Barbara Murphy
300559 Sub - Barbara Page
300559 Sub - Barra Faughnan
300559 Sub - Barry and Eibhlín McCabe
300559 Sub - Barry Larkin
300559 Sub - Barry Long
300559 Sub - Barry O'Shea
300559 Sub - Bartholomew Foley
300559 Sub - Ben Meehan
300559 Sub - Bernadette McGeady
300559 Sub - Bernie Fleming
300559 Sub - Bernie O'Quigley
300559 Sub - Betty Buckley
300559 Sub - Betty Krzyzanowski
300559 Sub - Bill Brophy
300559 Sub - Bill O'Meara
300559 Sub - Birdwatch Ireland
300559 Sub - Birgit Kretschmann
300559 Sub - Breda Ryan
300559 Sub - Breda Tobin
300559 Sub - Brendan and Patricia Ringwood
300559 Sub - Brendan and Sinead Ringwood
300559 Sub - Brendan Clarke
300559 Sub - Brendan Cooney
300559 Sub - Brendan McBride
300559 Sub - Brendan McKeon
300559 Sub - Brendan Murray
300559 Sub - Brendan Nelson
300559 Sub - Brendan Rankin
300559 Sub - Brendan Sheppard

300559 Sub - Brian Corbally
300559 Sub - Brian Cunningham
300559 Sub - Brian Fitzpatrick
300559 Sub - Brian Flood
300559 Sub - Brian Heapes
300559 Sub - Brian Keane
300559 Sub - Brian Moran
300559 Sub - Brian Nolan
300559 Sub - Brian O'Brien
300559 Sub - Brian Owens
300559 Sub - Brid Persse
300559 Sub - Bridgette Keane
300559 Sub - Brighid Smyth
300559 Sub - Brona McConville
300559 Sub - Bronwyn O'Connor
300559 Sub - Bryan Leeper
300559 Sub - Byrne Family
300559 Sub - Cait and Denis Murphy
300559 Sub - Caitlin and Michael Carr
300559 Sub - Caitriona Ní Dhálaig
300559 Sub - Caoimhe Ní Nualláin
300559 Sub - Caoimhe Sheridan
300559 Sub - Carmel Jordan
300559 Sub - Carmel Mulcahy
300559 Sub - Carol Browne
300559 Sub - Carol Leonard
300559 Sub - Carol Phelan
300559 Sub - Caroline Curtis and Derek O'Beirne
300559 Sub - Caroline Hughes
300559 Sub - Cathal McArdle

300559 Sub - Catherine and Paul Flynn
300559 Sub - Catherine Bennett
300559 Sub - Catherine Brodie
300559 Sub - Catherine Groves
300559 Sub - Catherine Logan
300559 Sub - Catherine Lonergan
300559 Sub - Catherine O'Connell
300559 Sub - Catherine Quinn
300559 Sub - Cathy and Fergal O'Brien
300559 Sub - Cathy Buffini
300559 Sub - Cathy Maguire
300559 Sub - Cathy Smith
300559 Sub - Charles and Mary Lathrop
300559 Sub - Charles Dolan
300559 Sub - Cian O' Conghaile
300559 Sub - Ciara Banks
300559 Sub - Ciara Mullarkey
300559 Sub - Ciaran and Alexandra Harris
300559 Sub - Ciaran and Gillian Corrigan
300559 Sub - Ciaran and Roisin Timmons
300559 Sub - Ciaran Bernard
300559 Sub - Ciaran Caullfield and Dearbhla White
300559 Sub - Ciaran Close
300559 Sub - Ciaran Hynes
300559 Sub - Ciaran O'Moore and Margaret Moore
300559 Sub - Claire and Pat Davis
300559 Sub - Claire and Raymond Quinn
300559 Sub - Claire Brady
300559 Sub - Claire Fergus
300559 Sub - Claire Parry Jones

300559 Sub - Clíodhna Guinness
300559 Sub - Cliona Long
300559 Sub - Clodagh Killen
300559 Sub - Clodagh Pugh
300559 Sub - Clontarf FC (John O'Neill, Chairperson)
300559 Sub - Clontarf Football Club
300559 Sub - Clontarf GAA Club
300559 Sub - Clontarf Residents Association
300559 Sub - Colette Barry
300559 Sub - Colette Eddery
300559 Sub - Colette Flood
300559 Sub - Colette McDonagh
300559 Sub - Colette O'Donnell
300559 Sub - Colin Day
300559 Sub - Colin McDonagh
300559 Sub - Collette Farnon
300559 Sub - Colm Aitron
300559 Sub - Colm Daly
300559 Sub - Colm Keady
300559 Sub - Colm Lynam and Judy Lynam
300559 Sub - Colm Nolan
300559 Sub - Colm O'Grady
300559 Sub - Colm O'Toole
300559 Sub - Conall Kelly
300559 Sub - Conor and Jean McKeating
300559 Sub - Conor Murphy
300559 Sub - Conor O'Callaghan
300559 Sub - Conor O'Regan
300559 Sub - Craig Killian and Niamh Caprani
300559 Sub - Cullen Family

300559 Sub - Damian Long
300559 Sub - Damian O'Farrell
300559 Sub - Damien and Sinead Markey
300559 Sub - Damien Bennett
300559 Sub - Damien O'Higgins
300559 Sub - Danny Skehan
300559 Sub - Daphne Andrews
300559 Sub - Dara and Alice O'Connor
300559 Sub - Daria Verjans and John McCarthy
300559 Sub - Darina Shouldice
300559 Sub - Darragh Meehan
300559 Sub - Darragh Pelly
300559 Sub - Darragh Persse
300559 Sub - Darren McKay
300559 Sub - Daryl Chaney
300559 Sub - DAU
300559 Sub - Dave Bruen
300559 Sub - Dave Clancy
300559 Sub - Dave O'Connor and Catherine Leavy
300559 Sub - David and Johanna Croughan
300559 Sub - David and Mary Dwyer
300559 Sub - David and Sheila Bateman
300559 Sub - David Barker
300559 Sub - David Carpenter
300559 Sub - David Clarke
300559 Sub - David Couy
300559 Sub - David Craig
300559 Sub - David Evans
300559 Sub - David Fitzgerald
300559 Sub - David Kenny

300559 Sub - David Kinsella
300559 Sub - David Kirwan and Bríd NíChonail
300559 Sub - David McCarra
300559 Sub - David O'Neill
300559 Sub - David Richards
300559 Sub - De Búrca Family
300559 Sub - De O'Connor
300559 Sub - Debbie and John Morrissey
300559 Sub - Debbie Doak
300559 Sub - Debbie Fagan
300559 Sub - Deborah Maguire
300559 Sub - Declan Groarke
300559 Sub - Declan O'Brien
300559 Sub - Declan O'Mahony
300559 Sub - Declan Ward
300559 Sub - Deirdre and Conor O'Shea
300559 Sub - Deirdre and Gerard Mullins
300559 Sub - Deirdre and John Molony
300559 Sub - Deirdre Byrne
300559 Sub - Deirdre Costello
300559 Sub - Deirdre Cunningham
300559 Sub - Deirdre Dooley
300559 Sub - Deirdre Heney
300559 Sub - Deirdre Nichol
300559 Sub - Deirdre Nolan White
300559 Sub - Deirdre O'Riordan
300559 Sub - Denis Carroll
300559 Sub - Denis Moore
300559 Sub - Denise and Leny White
300559 Sub - Denise and Shane Carthy

300559 Sub - Denise Bolger
300559 Sub - Denise Kelleher
300559 Sub - Denise Keville
300559 Sub - Denise Mitchell
300559 Sub - Denise O'Callaghan
300559 Sub - Derek and Anja Byrne
300559 Sub - Derek and Avril Charles
300559 Sub - Derek Bauer
300559 Sub - Derek Cunningham
300559 Sub - Derick Mitchell and Claire Hyland
300559 Sub - Dermot Brady
300559 Sub - Dermot Furey
300559 Sub - Dermot Healy
300559 Sub - Dermot Murphy
300559 Sub - Dermot O'Sullivan
300559 Sub - Dervil Jordan
300559 Sub - Dervila McGirr
300559 Sub - Desmond Clarke
300559 Sub - Desmond McKone
300559 Sub - Diarmuid and Jantze Cotter
300559 Sub - Dolores Cahill
300559 Sub - Dolores McManus
300559 Sub - Don Ross
300559 Sub - Donal and Anne McCarthy
300559 Sub - Donal and Mary O'Brien
300559 Sub - Donal and Susan Bambury
300559 Sub - Donal Bracken
300559 Sub - Donal F. McCarthy
300559 Sub - Donal Hampson
300559 Sub - Donal O'Connell

300559 Sub - Donie, Vera and Ross Bolger
300559 Sub - Donna Cooney
300559 Sub - Donna Murray
300559 Sub - Donny Keane
300559 Sub - Doreen Campbell
300559 Sub - Dorothy Dwyer
300559 Sub - Eadaoin and Pierce Geoghegan
300559 Sub - Eamon Collins
300559 Sub - Eamonn and Marie Herbert
300559 Sub - Eaoigh Harvey
300559 Sub - Edan Keenan
300559 Sub - Edel and James Foley
300559 Sub - Edel Connaughton
300559 Sub - Edel Leahy
300559 Sub - Edmond Manning
300559 Sub - Edward and Bernie O'Dea
300559 Sub - Edward and Mary Walsh
300559 Sub - Edward Anthony Mulhall
300559 Sub - Eibhlin Loughman
300559 Sub - Eileen Dolan
300559 Sub - Eileen Dwyer
300559 Sub - Eilish Burke
300559 Sub - Eimear Kenny
300559 Sub - Eimer Harding
300559 Sub - Eithne Cullinan
300559 Sub - Eithne Downey
300559 Sub - Eithne Jordan
300559 Sub - Eithne Shalloo
300559 Sub - Elaine Allen
300559 Sub - Elaine and Brian Minogue

300559 Sub - Elaine Davis
300559 Sub - Elaine Egan
300559 Sub - Elaine Mahon and Conor Cullen
300559 Sub - Elaine Mc Namara
300559 Sub - Elaine McCann
300559 Sub - Elizabeth and Robert Wilson
300559 Sub - Elizabeth Doyle
300559 Sub - Elizabeth Maguire
300559 Sub - Elizabeth Mawson
300559 Sub - Elizabeth Ryan
300559 Sub - Ellen Dolan
300559 Sub - Elva Stapleton
300559 Sub - Emer Burke
300559 Sub - Emer Herlihy and Mark Stringer
300559 Sub - Emer O'Connor
300559 Sub - Emma and Colm McAtamney
300559 Sub - Emma Bruce
300559 Sub - Emma Finn
300559 Sub - Emma Gleeson Haslett
300559 Sub - Emma Hogan
300559 Sub - Emma O'Doherty
300559 Sub - Emmett Johnston
300559 Sub - Enda Kelly
300559 Sub - Eoghan Browne
300559 Sub - Eoin Caulfield
300559 Sub - Eoin Fallon
300559 Sub - Erika O'Brien
300559 Sub - Ethna McQuillan
300559 Sub - Eugene and Una Bergin
300559 Sub - Eunan Watters

300559 Sub - Eva and Ellen Sexton
300559 Sub - Eva Vlavianou
300559 Sub - Evan O'Beiree
300559 Sub - Eve Horgan
300559 Sub - Evelyn Murphy
300559 Sub - Evin Crehan
300559 Sub - F. J. Pelly
300559 Sub - Fabio Aprile
300559 Sub - Fergal and Cliona O'Reilly
300559 Sub - Fergal Broughan
300559 Sub - Fergal McGuire
300559 Sub - Fergus MacCarthy
300559 Sub - Fiach O'Riain
300559 Sub - Fiachra O'Neill and Joanna McCartney
300559 Sub - Fintan Boyle
300559 Sub - Fiona Coghlan
300559 Sub - Fiona Dwyer Wright
300559 Sub - Fiona Higgins and Peter Gallogy
300559 Sub - Fiona Kearns
300559 Sub - Fiona Kirwan
300559 Sub - Fiona Leech
300559 Sub - Fiona Manning
300559 Sub - Fiona Sneyd
300559 Sub - Fionnan Ryan
300559 Sub - Fionnula Kennedy
300559 Sub - Forest Friends Ireland
300559 Sub - Frances Breen
300559 Sub - Frances Kinsella
300559 Sub - Francis O'Neill
300559 Sub - Frank Chambers

300559 Sub - Frank Dalton
300559 Sub - Frank Hamill
300559 Sub - Frank Keane
300559 Sub - Frank O'Regan
300559 Sub - Frederick Kealty
300559 Sub - G. D. Guidon
300559 Sub - Gabriel Foley
300559 Sub - Gabrielle and Michael Rowan
300559 Sub - Garret Rossi
300559 Sub - Garrett and Margaret MacNamara
300559 Sub - Garrett Connolly
300559 Sub - Gavin and Lydia Synnott
300559 Sub - Gearoid and Roisin Murtagh
300559 Sub - Gemma Cerasi and James Low
300559 Sub - George and Ailbhe Gaskin
300559 Sub - George Antonescu
300559 Sub - Georgina Moore
300559 Sub - Geraldine Clements
300559 Sub - Geraldine Grindley
300559 Sub - Geraldine Kenny
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300559 Sub - Geraldine Lee
300559 Sub - Geraldine McCarter
300559 Sub - Geraldine Sneddon
300559 Sub - Gerard and Niamh Keating
300559 Sub - Gerard Byrne and Others
300559 Sub - Gerard Curtin and Jill Pitcher
300559 Sub - Gerard Egan and Family
300559 Sub - Gerard Keane
300559 Sub - Gerard O'Rourke and Others

300559 Sub - Gerard Pope
300559 Sub - Gerry and Mary O'Donovan
300559 Sub - Gillian and Stephen Mulligan
300559 Sub - Gillian Cleary
300559 Sub - Gillian O'Sullivan
300559 Sub - Glen and Sandra Murphy
300559 Sub - Gordon and Alison Mahon
300559 Sub - Gordon Manning
300559 Sub - Grace and John Brereton
300559 Sub - Grace McAteer
300559 Sub - Graham Colmer
300559 Sub - Graham Roe
300559 Sub - Grainne Garvao
300559 Sub - Guus Leeuw
300559 Sub - Hannah Tobin
300559 Sub - Hans J and Mary P Romstedt
300559 Sub - Harry Keville
300559 Sub - Heidi Carreiro
300559 Sub - Helen and Francis O'Hara
300559 Sub - Helen and John Dunleavy
300559 Sub - Helen Codd
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300559 Sub - Helen Daly
300559 Sub - Helen Dwyer and David Corrigan
300559 Sub - Helen Hannigan
300559 Sub - Helen Jones
300559 Sub - Helen Redmond and Gerard Kearny
300559 Sub - Helen Reidy
300559 Sub - Helen Stanley
300559 Sub - Helena Dolan

300559 Sub - Helene Rice
300559 Sub - Helene Tobin
300559 Sub - Henry Garland
300559 Sub - Hilary and Mark Warren-McCaughey
300559 Sub - Hilary Stephens
300559 Sub - Hilda Verling
300559 Sub - Honor Clynes
300559 Sub - Ian and Regina Hughes
300559 Sub - Ian Flood
300559 Sub - Ian Guinness
300559 Sub - Ian Mackey
300559 Sub - Ian Martin
300559 Sub - Ian Reid
300559 Sub - Imelda Drange
300559 Sub - Ineke Derville
300559 Sub - Ingrid Madsen
300559 Sub - Iris O'Donovan
300559 Sub - Irish Water
300559 Sub - Ita O'Driscoll
300559 Sub - Jacinta, Heslin and Michael O'Scanail
300559 Sub - Jack Slane
300559 Sub - Jaime O Doherty
300559 Sub - James and Mairead O'Hara and family
300559 Sub - James Cahill
300559 Sub - James Kenny
300559 Sub - James O'Rourke
300559 Sub - Jamie Strode
300559 Sub - Jan O'Seachnasáí
300559 Sub - Jane Charles
300559 Sub - Jane Clarke and Dan Wallace

300559 Sub - Jane Horgan-Jones
300559 Sub - Jane Langley
300559 Sub - Jane McNulty
300559 Sub - Jane Morritt and Rossa Malone
300559 Sub - Jane O'Connor
300559 Sub - Jane Schwarzbacher
300559 Sub - Jane Wilson
300559 Sub - Janet Branigan
300559 Sub - Janet Day
300559 Sub - Janet MacNeice
300559 Sub - Janette Murphy
300559 Sub - Janice Leonard
300559 Sub - Jason Byrne
300559 Sub - Jean and John Doyle
300559 Sub - Jean Hayes and Tadhg Morriarty
300559 Sub - Jean Hickey
300559 Sub - Jean Owens
300559 Sub - Jennifer and Daniel Ashton
300559 Sub - Jennifer and Nigel Salmon
300559 Sub - Jennifer Byrne
300559 Sub - Jennifer Goody
300559 Sub - Jennifer McGrath
300559 Sub - Jennifer Roche
300559 Sub - Jenny and Paul Colbert
300559 Sub - Jenny and Paul Lanigan
300559 Sub - Jessie Fuller
300559 Sub - Jessie Walshe and Sinead Johnston
300559 Sub - Ji Hyun Kim
300559 Sub - Jill O'Callaghan
300559 Sub - JJ Vernon

300559 Sub - Joan Brayden
300559 Sub - Joan Butler
300559 Sub - Joan Dillon
300559 Sub - Joan Doyle and Family
300559 Sub - Joan Malone
300559 Sub - Joan Scully
300559 Sub - Joan Sharkey
300559 Sub - Joan Smyth
300559 Sub - Joanna and Joe Feeney
300559 Sub - Joanna Caffrey
300559 Sub - Joanne Cunningham
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300559 Sub - Jonathan Murray
300559 Sub - Jonathon and Kate Harte
300559 Sub - Joseph and Lynne Bell Murphy
300559 Sub - Joseph and Noreen Kenny
300559 Sub - Joseph Galvin
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300559 Sub - Josephine Kavanagh
300559 Sub - Joyce Brereton
300559 Sub - Joyce Farren and Kevin Nolan
300559 Sub - Joyce O'Neill
300559 Sub - Jude and Eoin Hanratty
300559 Sub - Judith McMahan
300559 Sub - Judy Evans
300559 Sub - Julia Patton
300559 Sub - Julie and Declan Headon
300559 Sub - June Howard
300559 Sub - June Maybury

300559 Sub - June Roche
300559 Sub - Junius Horne and Sally Ann Lynch
300559 Sub - Justin O'Flaherty
300559 Sub - Justyna McNeive
300559 Sub - Karen Mulvaney
300559 Sub - Karl Conway and Kate Nowak
300559 Sub - Karla Charles
300559 Sub - Kate and Jonathan Robbins
300559 Sub - Kate Ball
300559 Sub - Kate Bielinski
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300559 Sub - Katheryn Hackett
300559 Sub - Kathleen and Gerry Neenan
300559 Sub - Kathleen Burke
300559 Sub - Kathleen Burns
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300559 Sub - Kathleen Dunleavy Bracken and Others
300559 Sub - Kathleen Hayes
300559 Sub - Kathryn Bradley
300559 Sub - Kay and Joseph Lonergan
300559 Sub - Kay Dolan
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300559 Sub - Keith and Susan Comiskey
300559 Sub - Keith Fleming
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300559 Sub - Kelly McDonald
300559 Sub - Ken Darcy

300559 Sub - Kevin Prendergast
300559 Sub - Kevin Woods
300559 Sub - Kieran McNally
300559 Sub - Kieran O'Connell
300559 Sub - Kim and Joseph Fitzsimons
300559 Sub - Kirsti Allen
300559 Sub - Kirstie Flynn
300559 Sub - L Burtenshaw
300559 Sub - Larry and Celia Stanley
300559 Sub - Laura and Bert Brayden
300559 Sub - Laura and Conor Ferguson
300559 Sub - Laura Cavanagh
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300559 Sub - Laura Cummins
300559 Sub - Laura Mc Nally
300559 Sub - Leo and Thomasena McMorrow
300559 Sub - Leon Quigley
300559 Sub - Lia Monahan
300559 Sub - Liam and Pauline Nolan
300559 Sub - Liam and Shiela Faulkner
300559 Sub - Liam Doren
300559 Sub - Liam Regan
300559 Sub - Lily Brophy
300559 Sub - Linda Andrews
300559 Sub - Linda Davitt
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300559 Sub - Lindsay O'Toole
300559 Sub - Lisa Kenny
300559 Sub - Lorcan Kennedy
300559 Sub - Louise Coulter

300559 Sub - Louise Hogan
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300559 Sub - Louise nic an tSionnaigh
300559 Sub - Louise Whitfield
300559 Sub - Lucy Jones
300559 Sub - Lucy O'Dea
300559 Sub - Luisa Verling
300559 Sub - Luke Cunningham
300559 Sub - Luke Smyth and Family
300559 Sub - Lynn and Alan Byrne
300559 Sub - Lynn Hunter
300559 Sub - M Finucane
300559 Sub - M. Fagan
300559 Sub - Madeleine Barun
300559 Sub - Madeleine Coffey
300559 Sub - Maeve Keane
300559 Sub - Maeve Lyons
300559 Sub - Maeve Morrissey
300559 Sub - Maire Davis
300559 Sub - Maire Duffy and Gerard Neenan
300559 Sub - Maire McKeogh
300559 Sub - Maire Smyth
300559 Sub - Mairead Doyle
300559 Sub - Mairead Garry
300559 Sub - Malene Brazel
300559 Sub - Margaret and Tony Daly
300559 Sub - Margaret Byrne
300559 Sub - Margaret Egan
300559 Sub - Margaret Forde

300559 Sub - Margaret Fox
300559 Sub - Margaret Groarke
300559 Sub - Margaret Kerins
300559 Sub - Margaret Mohan
300559 Sub - Margaret Mueller
300559 Sub - Margaret Penrose
300559 Sub - Margaret Ward
300559 Sub - Margot Gordon
300559 Sub - Marguerite Collins
300559 Sub - Marguerite O'Brien
300559 Sub - Mari McCafferty and Peter Jackson
300559 Sub - Maria and Derek Beatty
300559 Sub - Maria and James Digan
300559 Sub - Maria Brennan
300559 Sub - Maria Chamber
300559 Sub - Maria Cherry
300559 Sub - Maria Cleary
300559 Sub - Maria McCarthy
300559 Sub - Maria Moore
300559 Sub - Maria Mulvany
300559 Sub - Maria Murphy McGeough
300559 Sub - Marian Harte
300559 Sub - Marian Kelly
300559 Sub - Marian O'Neill
300559 Sub - Marie and John O'Moore
300559 Sub - Marie Clarke
300559 Sub - Marie Cleary
300559 Sub - Marie Dolan
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300559 Sub - Marie McLaughlin
300559 Sub - Marie McMahon
300559 Sub - Marie Wallace
300559 Sub - Mark and Fiona Donnelly
300559 Sub - Mark and Jessica Byrne
300559 Sub - Mark Crossan
300559 Sub - Mark Culleton
300559 Sub - Mark Molloy and Aoife Sheridan
300559 Sub - Martha Hackett
300559 Sub - Martin and Laurianne Dowd
300559 Sub - Martin Corcoran
300559 Sub - Martin Metrustry
300559 Sub - Martin Stapleton
300559 Sub - Martina Beck
300559 Sub - Mary and Bart Lawler
300559 Sub - Mary and Norman Caprani
300559 Sub - Mary Barrett
300559 Sub - Mary Clare Ward
300559 Sub - Mary Cleary
300559 Sub - Mary Crean
300559 Sub - Mary Duffy
300559 Sub - Mary Hassett and Eoin MacCarthaigh
300559 Sub - Mary Haughey
300559 Sub - Mary Kenny
300559 Sub - Mary Mac Alister
300559 Sub - Mary McKeon
300559 Sub - Mary O'Callaghan
300559 Sub - Mary O'Connell
300559 Sub - Mary O'Donnell
300559 Sub - Mary O'Reilly

300559 Sub - Mary Poynton
300559 Sub - Mary Sweeny
300559 Sub - Mary Teresa Mc Kearney
300559 Sub - Mary Woods
300559 Sub - Matt Johnson
300559 Sub - Matthew O'Donoghue
300559 Sub - Maura Bedford
300559 Sub - Maura Canning
300559 Sub - Maura Ralph-Hennessy
300559 Sub - Maura Ryan Smyth
300559 Sub - Maureen Byrne
300559 Sub - Maurice and Maureen McGirr
300559 Sub - Maurice Curran
300559 Sub - Maurice Foley
300559 Sub - Max Krzyzanowski
300559 Sub - Megan Markey
300559 Sub - Melissa O'Callaghan
300559 Sub - Michael and Brigid Barry
300559 Sub - Michael and Eileen Ryan
300559 Sub - Michael and Pamela Foley
300559 Sub - Michael Brophy
300559 Sub - Michael Byrne
300559 Sub - Michael Connolly and Lorraine Stevens
300559 Sub - Michael Finn
300559 Sub - Michael J. Costello
300559 Sub - Michael Keane
300559 Sub - Michael McGlinchey and Grainne Ryan
300559 Sub - Michael McGuinness
300559 Sub - Michael Mohan
300559 Sub - Michael Moran

300559 Sub - Michael O'Brien
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300559 Sub - Michael O'Mahony
300559 Sub - Michael O'Reilly
300559 Sub - Michael Reidy
300559 Sub - Michael Shannon
300559 Sub - Michael Synnott
300559 Sub - Michael Walsh and Lisa McGirr
300559 Sub - Michael Walsh
300559 Sub - Micheal MacCearra
300559 Sub - Michelle and Derek Skehan
300559 Sub - Michelle Headon and Mark O'Brien
300559 Sub - Michelle King
300559 Sub - Michelle Magee
300559 Sub - Michelle Whittaker
300559 Sub - Mick and Mary Connell
300559 Sub - Moira John Glavey
300559 Sub - Móna O'Leary
300559 Sub - Monica Carter
300559 Sub - Monica Dolan
300559 Sub - Monica Hopkins
300559 Sub - Morgan Brickley
300559 Sub - Morgan Nolan
300559 Sub - Nancy Watson
300559 Sub - Naoise O'Muirí and Declan Flanagan
300559 Sub - Naoise O'Muirí
300559 Sub - Naomi Clohessy
300559 Sub - National Transport Authority
300559 Sub - Neasa Murray
300559 Sub - Neil and Meadhbh McNamara

300559 Sub - Neil Emerson
300559 Sub - Niall and Ali O'Brien
300559 Sub - Niall Coakley
300559 Sub - Niall Finneran
300559 Sub - Niall Henry
300559 Sub - Niall O'Donnell
300559 Sub - Niamh and Derek Keogh
300559 Sub - Niamh Coffey
300559 Sub - Niamh Fitzpatrick
300559 Sub - Niamh Hynes
300559 Sub - Niamh O'Connor
300559 Sub - Niamh O'Grady
300559 Sub - Niamh Parsons
300559 Sub - Nicholas Vadja and Nora Hamill
300559 Sub - Nicola Barry and Daniel Macauley
300559 Sub - Nicola Foxe and Robert Delaney
300559 Sub - Nicole Kennedy
300559 Sub - Nikki Brennan
300559 Sub - Noel and Catriona McNamara
300559 Sub - Nora Rice
300559 Sub - Noreen Harkin
300559 Sub - Noreen O'Kelly
300559 Sub - Noreen Ripaud O'Brien
300559 Sub - Noreen Rowsome
300559 Sub - Norman Ludgate
300559 Sub - Nuala Headon
300559 Sub - Odran and Leona Dowdall
300559 Sub - Oisin Brennan
300559 Sub - Olive Fitzpatrick
300559 Sub - Olive Fitzsimons

300559 Sub - Olive Hegarty
300559 Sub - Olivia Mooney
300559 Sub - Olwyn Puirseil
300559 Sub - Oonagh Plunkett
300559 Sub - Orla and Ruairi Cunningham
300559 Sub - Orla Farrell and Owen Wilson
300559 Sub - Orla Fitzsimons
300559 Sub - Orla Gilhooly
300559 Sub - Orlaith O'Daly
300559 Sub - Owen Donohoe
300559 Sub - Owen O'Mahony
300559 Sub - Paddy and Jill Grainger
300559 Sub - Paddy Monahan
300559 Sub - Paddy Nugent
300559 Sub - Padraic and Mary Carr
300559 Sub - Padraic McKiernan
300559 Sub - Padraig and Joanne Giles
300559 Sub - Pádraig Breatnach
300559 Sub - Padraig Whelton
300559 Sub – Nora O'Sullivan
300559 Sub - Pamela Gaynor Doyle
300559 Sub - Pat and Eddie Byrne
300559 Sub - Pat and Maura Devine
300559 Sub - Pat and Maura Kenny
300559 Sub - Patricia Bruce
300559 Sub - Patricia Conlon
300559 Sub - Patricia Crosbie and Tony Geoghegan
300559 Sub - Patricia Duggan
300559 Sub - Patricia Lorigan
300559 Sub - Patricia Walsh

300559 Sub - Patrick A. Kennedy
300559 Sub - Patrick and Eimer Cooke
300559 Sub - Patrick and Fiona Walsh
300559 Sub - Patrick and Patricia O'Hara
300559 Sub - Patrick and Teresa Markey
300559 Sub - Patrick Brophy
300559 Sub - Patrick Delaney
300559 Sub - Patrick Gilmour
300559 Sub - Patrick Robinson
300559 Sub - Patrick Ryan, Deirdre O'Neill and Family
300559 Sub - Patrick Seán Ó'Meara
300559 Sub - Patrick Stack
300559 Sub - Patrick Twomey
300559 Sub - Paul and Aine Caulfield
300559 Sub - Paul and Emma Colgan
300559 Sub - Paul and Rosarii Moran
300559 Sub - Paul and Sinead Birch
300559 Sub - Paul Brennan
300559 Sub - Paul Carroll
300559 Sub - Paul Coffey
300559 Sub - Paul D. Reede
300559 Sub - Paul Kenny
300559 Sub - Paul Murray
300559 Sub - Paul Smyth
300559 Sub - Paul Tosney
300559 Sub - Paula and Pat Lawlor
300559 Sub - Paula Hevey
300559 Sub - Paula Murphy
300559 Sub - Pauline Bolger
300559 Sub - Pauline Burke

300559 Sub - Pauline Greevy
300559 Sub - Pauline O Carroll
300559 Sub - Peadar Slattery and Family
300559 Sub - Peter and Lorraine Maxwell
300559 Sub - Peter Brazel
300559 Sub - Peter Byrne
300559 Sub - Peter Collins
300559 Sub - Peter Cummins
300559 Sub - Peter Fennelly
300559 Sub - Peter Holland
300559 Sub - Peter Kavanagh
300559 Sub - Peter Kilmartin and Aileen McKenna
300559 Sub - Peter O'Callaghan
300559 Sub - Peter O'Daly
300559 Sub - Peter Reddy
300559 Sub - Peter Sheridan
300559 Sub - Peter Slattery
300559 Sub - Peter Smyth
300559 Sub - Peter Sweetman
300559 Sub - Phil Dunne
300559 Sub - Phil Feely
300559 Sub - Philip and Ling Watson
300559 Sub - Philip Keogh
300559 Sub - Phillip Cox
300559 Sub - Phillip Levey
300559 Sub - Philomena Madsen
300559 Sub - Phylomena and Thomas Byrne
300559 Sub - Pierce Cedan
300559 Sub - R Fagan
300559 Sub - Rab Cherry and Maire Curran

300559 Sub - Rachel and Barry McGaughey
300559 Sub - Rachel and Pat Caulfield
300559 Sub - Rachel Carmody Design Limited
300559 Sub - Rachel Dalton
300559 Sub - Rachel Lysaght
300559 Sub - Rachel O'Toole
300559 Sub - Raheny Foroige Club
300559 Sub - Raheny GAA
300559 Sub - Raheny Heritage Society
300559 Sub - Raheny Shamrock Athletic Club
300559 Sub - Raheny United Football Club
300559 Sub - Ralph and Jeanette MacDarby
300559 Sub - Ralph Lonergan
300559 Sub - Randall Burke
300559 Sub - Ray and Irene Loughran
300559 Sub - Ray Barragry
300559 Sub - Ray Byrne
300559 Sub - Rebecca Kelly
300559 Sub - Redmond Duffy
300559 Sub - Rene Collier
300559 Sub - Richard and Elizabeth Cannon
300559 Sub - Richard and Kathleen Brady
300559 Sub - Richard and Krish Power
300559 Sub - Richard and Maria Watson
300559 Sub - Richard and Sarah Burke
300559 Sub - Richard Carr and Oonagh McGowan
300559 Sub - Richard Doyle
300559 Sub - Richard O'Connor
300559 Sub - Richard Tobin
300559 Sub - Richard Verling

300559 Sub - Richelle Manning
300559 Sub - Rita Burns
300559 Sub - Rita Gallagher
300559 Sub - Rita Harris
300559 Sub - Robbie Collins
300559 Sub - Robert Alexander
300559 Sub - Robert Brazel
300559 Sub - Robert Fennelly
300559 Sub - Robert Walsh
300559 Sub - Robert Watts
300559 Sub - Roderick and M E Maguire
300559 Sub - Roderick Maguire
300559 Sub - Roger English
300559 Sub - Roisin Dooley
300559 Sub - Roisin Meehan
300559 Sub - Roisin Ryan
300559 Sub - Roisin Treanor
300559 Sub - Ronald and Caroline Buchanan
300559 Sub - Ronan and Martina Dodd
300559 Sub - Ronan Culhane
300559 Sub - Ronan Leech
300559 Sub - Ronan McCoy
300559 Sub - Ronan McDonnell
300559 Sub - Ronan O'Brien
300559 Sub - Ronan O'Hurley
300559 Sub - Rosaleen Cahill
300559 Sub - Rosaleen Loughman
300559 Sub - Roslyn Doran
300559 Sub - Rossa Bunworth
300559 Sub - RoylIn Johnson

300559 Sub - Ruth Fullam
300559 Sub - Ruth Kirwan
300559 Sub - Ruth McManus
300559 Sub - Ruth Penny
300559 Sub - Sally Hogg
300559 Sub - Sam Manning
300559 Sub - Sandra Brophy
300559 Sub - Sandra Hipson and Ciaran Peyton
300559 Sub - Sara Philpott
300559 Sub - Sarah Clarkin and Jan Leyden
300559 Sub - Sarah Clohisey
300559 Sub - Sarah Delaney
300559 Sub - Sarah Howarth
300559 Sub - Sarah Lowry
300559 Sub - Sarnat Bennett
300559 Sub - Seamus and Eavan O'Halloran
300559 Sub - Seamus Bergin
300559 Sub - Seamus O'Connor
300559 Sub - Sean Brennan
300559 Sub - Sean Cronin
300559 Sub - Sean D'Art
300559 Sub - Seán Dunne
300559 Sub - Sean Haughey and Sean Paul Mahon
300559 Sub - Sean Kelly
300559 Sub - Sean McPhillips
300559 Sub - Sean Nolan
300559 Sub - Sean O'Brien
300559 Sub - Sean O'Seachnasáí
300559 Sub - Sean Ryan
300559 Sub - Sean Savage

300559 Sub - Shane and Samantha Cantwell
300559 Sub - Shane Brodie
300559 Sub - Shane Mc Donnell
300559 Sub - Sharon Feerick
300559 Sub - Sharon Hurley
300559 Sub - Sharon Keilthy
300559 Sub - Shaun Moran and Antoinette Keaveney
300559 Sub - Shay McGovern and Antoinette Heery
300559 Sub - Sheelagh Fowler
300559 Sub - Sheena McCaffrey
300559 Sub - Sheila and Moira Nolan
300559 Sub - Sheila Fleming and Others
300559 Sub - Sheila Headon
300559 Sub - Sheila Johnston
300559 Sub - Sheila Nesbitt
300559 Sub - Sile Clancy
300559 Sub - Simon Collier
300559 Sub - Sinead and Bernard Mullen
300559 Sub - Sinead and Gareth Clancy
300559 Sub - Sinead and Neil Riordan
300559 Sub - Sinead Caprani
300559 Sub - Sinead Carty
300559 Sub - Sinead Dillon
300559 Sub - Sinead O'Boyle
300559 Sub - Sinead Pierce
300559 Sub - Siobhan and Noel Osborne
300559 Sub - Siobhan Clifford
300559 Sub - Siobhan Coffey
300559 Sub - Siobhan Fagan
300559 Sub - Siobhan Kennedy

300559 Sub - Siobhan Macee
300559 Sub - Siobhan McDermott
300559 Sub - Siobhan McKay
300559 Sub - Siobhan Walsh
300559 Sub - Sonja Krzyzanowski
300559 Sub - Sonya Henaghan and Dermot Gough
300559 Sub - Sophie Gough
300559 Sub - SORCHA CARTY
300559 Sub - Stella McCormick
300559 Sub - Stephanie and Connor Peyton
300559 Sub - Stephanie Geoghegan
300559 Sub - Stephen and Eva Lawlor
300559 Sub - Stephen and Geraldine Moreau
300559 Sub - Stephen Collins
300559 Sub - Stephen Croughan
300559 Sub - Stephen Devine
300559 Sub - Stephen Dolan
300559 Sub - Stephen O'Brien
300559 Sub - Stuart and Siobhan Baldwin
300559 Sub - Sue Dolan
300559 Sub - Sue Hickey
300559 Sub - Susan Collins and Matthew Jameson
300559 Sub - Susan Fitzgerald
300559 Sub - Susan McHugh
300559 Sub - Susan Minihane
300559 Sub - Susan Noone
300559 Sub - Susan St. Ledger
300559 Sub - Susan Woods
300559 Sub - Susanna De Abrew
300559 Sub - Suzanne Barror and Robert Callaghan

300559 Sub - Suzanne Young
300559 Sub - Svetlana Gatova and Vladimiro Gkatidis
300559 Sub - Sylvia McGennis
300559 Sub - T Farrelly
300559 Sub - Tanya Griffin
300559 Sub - Tanya Kelly
300559 Sub - Tara and David Manigo
300559 Sub - Tara Clements
300559 Sub - Tara O'Connor
300559 Sub - Terence Magee
300559 Sub - Terence Tew
300559 Sub - Terence Tinnelly
300559 Sub - Terri Curran
300559 Sub - Terry Browne
300559 Sub - TFC Bradshaw
300559 Sub - Thelma Bradley
300559 Sub - Theresa Burton
300559 Sub - Therese Gumbrielle
300559 Sub - Thomas and Catherine Foxe
300559 Sub - Thomas Davis
300559 Sub - Thomas Fitzsimons
300559 Sub - Thomas P. Broughan
300559 Sub - Thomas Vickers
300559 Sub - Tim and Aine Haier
300559 Sub - Tim and Ursula Morrissey
300559 Sub - Tim Geoghegan
300559 Sub - Timothy McAuley
300559 Sub - Tina and Emmett Casserly
300559 Sub - Tom and Anne Potts
300559 Sub - Tom and Helen Delaney

300559 Sub - Tom Brabazon
300559 Sub - Tom Coffey
300559 Sub - Tom Donnellan
300559 Sub - Tom Gleeson
300559 Sub - Tony Battigan
300559 Sub - Tony Nolan
300559 Sub - Tony St. Ledger
300559 Sub - Tracy O'Dea
300559 Sub - Transport Infrastructure Ireland
300559 Sub - Treacy McGoldrick
300559 Sub - Trevor Lonergan
300559 Sub - Triona Kenna
300559 Sub - Una Brennan
300559 Sub - Ursula McMahon
300559 Sub - V. O'Neill
300559 Sub - Valerie Behan
300559 Sub - Vanda and Brian Cummins
300559 Sub - Veronica Clohisey
300559 Sub - Vincent Greene
300559 Sub - Vincent Kelly
300559 Sub - Vivienne Bates
300559 Sub - Vivienne Mahon
300559 Sub - William Corgan
300559 Sub - William Cummings