

Daniel O'Connor

From: Sorcha Turnbull <sorchaturnbull@bradyshipmanmartin.com>
Sent: Tuesday 14 October 2025 11:01
To: Appeals2
Subject: Response to ACP- ABP-315183-22
Attachments: 6902_Foxlands LRD_Response to ACP_20251014_Final.pdf

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Dear Sir/Madam

On behalf of the applicant, Raheny 3 Limited Partnership, 25 Merrion Square North, Dublin 2, D02 E392, we hereby provide a response to a request for information from An Coimisiún Pleanála (ACP), as issued to us on 26th September 2025 in respect of ABP-315183-22. Should you have any queries please don't hesitate to contact us.

Regards

Sorcha

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An Coimisiún Pleanála
64 Marlborough St,
Dublin 1,
D01 V902

Date: 14th October 2025

Re: Response to An Coimisiún Pleanála on a Large Scale Residential Development Application at lands east of St. Paul's College, Sybil Hill Road, Raheny, Dublin 5
(ABP-315183-22; LRD6002/22/S3)

Dear Sir/Madam

On behalf of the applicant, Raheny 3 Limited Partnership, 25 Merrion Square North, Dublin 2, D02 E392, we hereby provide a response to a request for information from An Coimisiún Pleanála (ACP), as issued to us on 26th September 2025. A response is provided to each of the queries requested by ACP as follows:

1. Clarify how the proposed Large Scale Residential Development (including the proposed nursing home facility), proposed in this application, complies with the criteria set out under the zoning objective for the subject site as per the Dublin City Development Plan, 2022-2028 i.e. Z9 'Amenity/Open Space Lands/Green Network', and Z15 'Community and Social Infrastructure'.

When the LRD Application was lodged with Dublin City Council, determined by Dublin City Council and ultimately appealed to An Coimisiún Pleanála (An Bord Pleanála at the time) the area of the site on which residential development is proposed was zoned 'Z15 – Institutional & Community Uses' which facilitated the development of residential accommodation and as such was compliant with the provisions of the Dublin City Development Plan.

2. Clarify having regard to the current zoning of the site, how the development complies with the legislative provisions of Section 32A (1) and (2)(b)(ii) of the Planning and Development Act 2000, as amended, which refers to Large-Scale Residential Development (LRD) on land 'the zoning of which facilitates its use for the purposes proposed in the application'.

When the LRD Application was lodged with Dublin City Council, determined by Dublin City Council and ultimately appealed to An Coimisiún Pleanála (An Bord Pleanála at the time) the area of the site on which residential development is proposed was zoned 'Z15 – Institutional & Community Uses' which facilitated the development of residential accommodation and as such was compliant with the legislative provisions of Large Scale Residential Development.

3. Provide further information pertaining to the Natura Impact Report, which accompanies the Dublin City Development Plan, 2022-2028 and to clarify how the proposed development, complies with the protective policies and objectives (including the zoning objectives set out therein) of the Dublin City Development Plan, 2022-2028, which protect the network of ex situ inland feeding sites in order to avoid or reduce the potential for impacts on the integrity of Natura 2000 sites.



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As set out in our previous submission to ACP, in response to a submission made by Birdwatch Ireland, site-specific survey data records no terrestrial grazing/foraging by LBBG on the lands since winter 2018/19, confirming unsuitability has persisted for six winters. Over the same period, population/ context indicators for Dublin Bay SPAs show no observable long-term adverse effect on population trends for LBBG. We rely on the best scientific knowledge reasonably available, and we present complete, precise and definitive findings to remove any reasonable scientific doubt. On the basis of complete, precise survey and population evidence provided in the 2022 NIS, there is no reasonable scientific doubt that the development in question will not adversely affect the integrity of the relevant SPAs in view of their Conservation Objectives.

4. **Provide any further information, for example any relevant provisions of the current Dublin City Development Plan, 2022-2028; or any other relevant matter in accordance with the applicable legislation for Large Scale Residential Development, which you consider might assist the Commission in clarifying its ability to deal with this appeal.**

When the LRD Application was lodged with Dublin City Council, determined by Dublin City Council and ultimately appealed to An Coimisiún Pleanála (An Bord Pleanála at the time) the area of the site on which residential development is proposed was zoned 'Z15 – *Institutional & Community Uses*' which facilitated the development of residential accommodation and as such was compliant with the legislative provisions of Large Scale Residential Development and with the provisions of the Dublin City Development Plan.

We look forward to receiving a decision on the appeal by An Coimisiún Pleanála in due course.

Yours sincerely,

Sorcha Turnbull

Associate & Senior Planner

Brady Shipman Martin