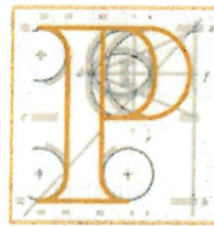


Case Number: ABP-315183-22

Planning Authority Reference Number: LRD6002/

Your Reference: Raheny 3 Limited Partnership



An
Coimisiún
Pleanála

Brady Shipman Martin
Unit H, Mountpleasant Business Centre
Mountpleasant Avenue Upper
Ranelagh
Dublin 6
D06 X7P8

Date: 26 September 2025

Re: Construction of 580 no. apartments and associated site works.
Lands to the east of Saint Paul's College, Sybil Hill Road, Raheny, Dublin 5.
(www.foxlandslrd2022.ie)

Dear Sir / Madam,

I have been asked by An Coimisiún Pleanála to refer to the above-mentioned Large Scale Residential Development appeal.

The Commission notes that this application is made under the applicable legislation for large scale residential development. Specifically, the Commission notes 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'.

Following a site inspection and a review of the application documentation including drawings and having regard to the first party appeal and observations received, the Commission notes that the Dublin City Development Plan, 2016-2022, was in effect at the time Dublin City Council issued its decision on the LRD Application on the 28th day of October 2022.

Under this plan, the majority of the lands were zoned Z15 in the Dublin City Development Plan, 2016-2022. The Z15 zoning objective was "To protect and provide for institutional and community uses", under which residential development was open for consideration. A small section of the application boundary was on lands zoned Z9, in the 2016 – 2022 Plan, which had a stated objective "To preserve, provide and improve recreational amenity and open space and green networks", as this included lands within St. Anne's Park, required to provide for the routing of a surface water discharge from the site via St. Anne's Park to the Naniken River.

The Dublin City Development Plan, 2016-2022, however, has been superseded by the Dublin City Development Plan, 2022-2028, which came into effect on the 14th day of December 2022. Under the current operative plan (i.e. Dublin City Development Plan, 2022 – 2028), the majority of the subject lands are zoned Z9 'Amenity/Open Space Lands/Green Network', with a stated objective "To preserve, provide

Teil
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost
Tel
LoCall
Fax
Website
Email

(01) 858 8100
1800 275 175
(01) 872 2684
www.pleanala.ie
communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

and improve recreational amenity, open space and ecosystem services". Part of the application site, i.e. the location of the proposed access through St. Paul's College is zoned Z15 'Community and Social Infrastructure', with a stated objective "To protect and provide for community uses and social infrastructure".

Furthermore, the Commission notes that the Natura Impact Report (NIR), which accompanies the Dublin City Development Plan, 2022-2028 states "publicly available data and information (Benson 2009, Scott Cawley Ltd., 2017, Enviro Guide 2019) which is based on records compiled from the Irish Brent Goose Research Group, BirdWatch Ireland and survey data collected to inform research and planning applications, confirms that there is a network of ex situ inland feeding sites used by Qualifying Interest winter bird species of Special Protection Areas". The NIR also states that "Loss of these ex-situ sites, individually or cumulatively, has the potential to adversely affect these bird species". The NIR further states that "the majority of sites previously surveyed and identified as ex-situ inland feeding sites are proposed for the zoning category Z9 Amenity / Open Space Lands / Green Network. There are aspects of this zoning category which provide a protective function to these sites as they will be retained as green amenity spaces".

The Commission has examined the appeal and is of the opinion that certain information is necessary for the purpose of enabling it to determine the appeal.

In accordance with article 73A(1)(a) of the Planning and Development Regulations 2001 (as amended) you are required to submit, **on or before 16th October 2025**, the following -

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'.**
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'.**
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.**
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.**

If the information required is not received before the end of the specified period, the Commission will dismiss or otherwise determine the appeal without further notice to you in accordance with section 133 of the 2000 Act, (as amended). Your submission in response to this notice must be received by the Commission not later than **5.30 p.m. on the date specified above**.

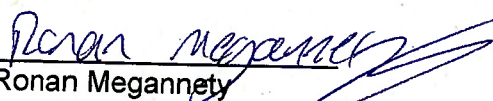
Please quote the above appeal reference number in any further correspondence.

Tell	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1800 275 175
Facs	Fax	(01) 872 2684
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	communications@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902

If you have any queries in the meantime, please contact the undersigned officer of the Commission at appeals@pleanala.ie.

Yours faithfully,



Ronan Megannety
Executive Officer
Direct Line:

BP71 Registered Post

Teil
Glaó Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

Tel (01) 858 8100
LoCall 1800 275 175
Fax (01) 872 2684
Website www.pleanala.ie
Email communications@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

100

THE UNIVERSITY OF CHICAGO

1950

1951

1952