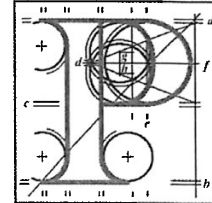


Our Case Number: ABP-315183-22

Planning Authority Reference Number: LRD6002/22S3



**An
Bord
Pleanála**

Diarmuid Dunne
127 Mount Prospect Ave
Clontarf
Dublin 3

Date: 22 December 2022

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

Dear Sir / Madam,

An Bord Pleanála has received your submission including your fee of €50.00 in relation to the above-mentioned large-scale residential development and will consider it under the Planning and Development Act 2000, as amended.

Your observations in relation to this appeal will be taken into consideration when the appeal is being determined.

Section 130(4) of the Planning and Development Act 2000, as amended, provides that a person who makes submissions or observations to the Board shall not be entitled to elaborate upon the submissions or observations or make further submissions or observations in writing in relation to the appeal and any such elaboration, submissions or observations that is or are received by the Board shall not be considered by it.

If you have any queries in relation to the appeal, please contact the undersigned. Please mark in block capitals "Large-Scale Residential Development" and quote the above-mentioned reference number in any correspondence with An Bord Pleanála.

Yours faithfully,

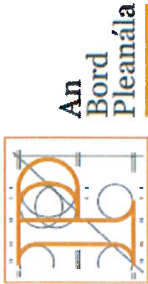
Ashling Doherty
Executive Officer
Direct Line: 01-8737160

LRD40 Acknowledge valid observer submission

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

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

Lodgement Cover Sheet - LDG-060169-22



Details

Lodgement Date	21/12/2022
Customer	Diarmuid Dunne
Lodgement Channel	Web Portal
Lodgement by Agent	No
Agent Name	
Correspondence Primarily Sent to	
Registered Post Reference	

Lodgement ID	LDG-060169-22
Map ID	
Created By	Niamh Hickey
Physical Items included	No
Generate Acknowledgement Letter	
Customer Ref. No.	
PA Reg Ref	LRD6002/22S3

Categorisation

Lodgement Type	Observation / Submission
Section	Strategic Housing

PA Name	Dublin City Council North
Case Type (3rd Level Category)	Appeal - LRD

Fee and Payments

Specified Body	No
Oral Hearing	No
Fee Calculation Method	System
Currency	Euro
Fee Value	0.00
Refund Amount	

Observation/Objection Allowed?	Yes
Payment	PMT-047049-22
Related Payment Details Record	PD-046939-22

Observation

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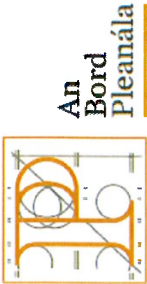
	The development will consist of: 1. The construction of a residential development set out in 7 no. blocks, ranging in height from 4 to 7 storeys to accommodate 580 no. apartments,
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Run at: 22/12/2022 11:06

Run by: Niamh Hickey

Lodgement Cover Sheet - LDG-060169-22

315183-22



Details

Lodgement Date	21/12/2022
Customer	Diarmuid Dunne
Lodgement Channel	Web Portal
Lodgement by Agent	No
Agent Name	
Correspondence Primarily Sent to	
Registered Post Reference	

Lodgement ID	LDG-060169-22
Map ID	
Created By	Niamh Hickey
Physical Items included	No
Generate Acknowledgement Letter	
Customer Ref. No.	
PA Reg Ref	LRD6002/22S3

Categorisation

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Observation/Objection Allowed?	Yes
Payment	PMT-047049-22
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Observation

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Run at: 22/12/2022 11:06

Run by: Niamh Hickey

residential tenant amenity spaces, a crèche and a 100 bed nursing home. The site will accommodate 520 no. car parking spaces, 1574 no. bicycle parking spaces, storage, services and plant areas. Landscaping will include extensive communal amenity areas, and a significant public open space provision. 2. The 7 no. residential buildings range in height from 4 storeys to 7 storeys accommodating 580 no. apartments comprising 272 no. 1 bed units, 15 no. 2 bed units (3-person), 233 no. 2 bed units (4-person), 60 no. 3 bed units. Balconies and terraces to be provided on all elevations at all levels for each block. The breakdown of residential accommodation is as follows: Block A is a 5 storey building, accommodating 61 no. units; Block B is a 5 storey building, accommodating 70 no. units; Block C is a 5-7 storey building, accommodating 112 no. units; Block D is a 4-5 storey building, accommodating 136 no. units; Block E is a 4-7 storey building, accommodating 96 no. units; Block F is a 5 storey building, accommodating 36 no. units; Block G is a 5 storey building, accommodating 69 no. units; Residential tenant amenity space is provided at ground level of Block C, D, E, F & G (c.961 sq.m). External residential open space between and adjacent all blocks. A crèche is provided in Block G with a total floor area of c.750 sq.m and external play spaces totalling c.583 sq.m. 3. A proposed 100 bed nursing home with ancillary amenity and service areas and staff facilities, located to the south of the site, as part of Block G. The proposed nursing home consists of a 4 storey building arranged around a courtyard garden which also forms part of the wider Block G. 4. Blocks C & D and F & G are located above a

PA Case Number	Development Description
LRD6002/22S3	proposed basement and central podium containing parking areas, plant areas, waste storage. The car-parking breakdown is as follows: Residential: 471 spaces across basement, podium and surface; Nursing Home: 41 across podium and surface; and Crèche- 8 all at surface level. A total of 1574 cycle parking spaces are provided at basement, podium and throughout the site in both secure parking facilities for residents and staff and at surface level for short term/visitors.5. Total public open space proposed is c.2.09 ha which includes a new c.1.78ha public open space which is provided to the south and east of the site and includes for 6 no. playing pitches of mixed sizes to be taken in charge by Dublin City Council (of a total area of c.1.8ha to be taken in charge). Proposed pedestrian access from the site to the adjacent St Anne's Park is proposed on the southern boundary of the site. 6. Widening and realignment of an existing vehicular access onto Sybil Hill Road to facilitate the construction of an access road with footpaths and on-road cycle tracks from Sybil Hill Road between Sybil Hill House and St Paul's College incorporating new accesses to Sybil Hill House and St Paul's College and the provision of new wall and railing boundary treatment along the new road and new pedestrian/vehicular gates to the new and existing accesses to Sybil Hill House and St Paul's College. To facilitate this new access road it is proposed to demolish an existing pre-fab building. The application also includes for the relocation of an existing pedestrian crossing on Sybil Hill Road. 7. The routing of surface water discharge from the site via St. Anne's Park to the Naniken River and the demolition and reconstruction of existing pedestrian river crossing in St.

PA Decision Date	28/10/2022
County	
Development Type	
Development Address	Lands to the east of Saint Paul's College, Sybil Hill Road, Raheny, Dublin 5
Appellant	
Supporting Argument	

	Anne's Park with integral surface water discharge to Naniken River. 8. The proposed application includes all site landscaping works, green roofs, substations, PV panels, boundary treatments, lighting, servicing, signage, surface water attenuation facilities and associated and ancillary works, including site development works above and below ground. An Environmental Impact Assessment Report and a Natura Impact Statement have been prepared in respect of the proposed development. The planning application may be inspected, or purchased at a fee not exceeding the reasonable cost of making a copy, at the offices of Dublin City Council during its public opening hours and a submission or observation in relation to the application may be made to the authority in writing on payment of the prescribed fee within the period of 5 weeks beginning on the date of receipt by the authority of the application. The application may also be inspected online at the following website set up by the applicant www.foxlandsIrd2022.ie.
Applicant	
Additional Supporting Items	

Diarmuid Dunne,
127 Mount Prospect Ave,
Clontarf
Dublin 3

21st December 2022

Re: Observation on ABP Case Reference LH29N. 315183
Application number: LRD6002/22-S3

Dear Sir,

I am writing in relation to the planning appeal submitted in relation to Dublin City Councils refusal for a large-scale residential and nursing home development and nursing home on park lands to the back of St. Paul's College, Sybil Hill Road, at St. Anne's Park, Raheny, Dublin 5. I enclose the requisite fee of €50.

I believe that the points detailed below are sufficient grounds to uphold Dublin City Councils decision to refuse planning permission for the proposed development.

1. The lands in question have been used as playing fields for the children of North Dublin (and the pupils of St Pauls College) for over eighty years. It is not in the public interest that these lands be lost in whole or in part from their use as playing fields. The current planning application (LRD6002/22-S3) is in contravention of the Judgement of Humphreys J. delivered on Friday the 7th day of May21 ([2021] IEHC 303) which found that the zoning of the St Pauls Playing Fields is tied to its established use as a sports ground. The change of ownership does not change the zoned use, which in the judgement was confirmed to be a sports ground.
2. The elected representatives on Dublin City Council are unanimous in their support of the community to protect these lands for their established sporting and biodiversity uses. This planning application is contrary to the clear intentions of the democratically elected representatives in that it has been lodged after they have sought to protect the lands by designating them Z9 "Amenity Use" in the current Draft City Development Plan 2022-2028. The large residential development proposed is not permissible under the Z9 zoning.
3. The previous Z15 zoning applied to the lands, prior to the 14th of December 2022 was intended to protect the amenity and biodiversity use of the St Pauls playing fields. The Council has sought to strengthen the recognition and role of the City's Z15 land-bank under the Draft Plan by protecting, improving, and encouraging the ongoing use of lands zoned Z15 in the Draft Plan for community and social use.
4. In the planning application the lands are described as "Lands to the east of Saint Paul's College, Sybil Hill Road, Raheny, Dublin 5" whereas they should be more accurately described as the St Pauls Playing Fields in St Anne's Park, and which are geographically, ecologically and socially a part of St Anne's Park.

5. The proposed development does not retain or protect the long-standing sporting and amenity use of the lands and therefore the development is not in compliance with the previous Z15 or current Z9 zoning.

6. I and many other members of the public have had the pleasure of using St Annes Park for amenity and sporting purposes for over sixty years. For the vast majority of this time the St Pauls part of the park was not fenced off in the way it currently is. Until relatively recently the public had full access to these lands with unimpeded access from the rest of the park, and were free to walk in the lands, play sports etc etc.. The efforts to alienate the lands through fencing prior to sale should not be allowed interfere with the situation prevailing prior to the recent fencing.

7. The lands in question remain within the boundaries of St Anne's Park, which forms a continuation of the unique biosphere of the bull wall and Dollymount. The wildlife within the park deserves protection and the park itself becomes more valuable every year to insects and all wildlife, as the city grows and grows. No building should ever be allowed on such a site.

8. Government Policy is to encourage greater exercise by children and young adults to help avoid the great and varied health issues associated with obesity and lack of exercise. Loss of the current playing fields runs contrary to Government health policy.

9. People come from all over Dublin to use the natural outdoor park facilities provided by St Annes Park. The proposed residential development and nursing home will impact negatively on the park, the public who use it and nature.

10. There is already major traffic congestion on Sybil Hill Road. The proposed exit from the proposed residential development runs through the current St Pauls College grounds and connects to Sybil Hill close to two school's entrances, an old folk's home entrance and an existing apartment entrance. The additional traffic would result in unsustainable traffic levels, and higher pollutant levels close to schools.

Yours sincerely,
Diarmuid Dunne