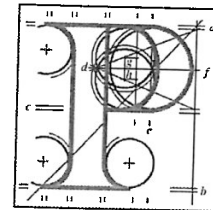


Our Case Number: ABP-315183-22

Planning Authority Reference Number: LRD6002/22S3



**An
Bord
Pleanála**

John Leslie
224 Elm Mount Avenue
Beaumont
Dublin 9

Date: 23 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
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

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

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Lodgement Cover Sheet - LDG-060149-22

Details

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

Categorisation

Lodgement Type	Observation / Submission
Section	Strategic Housing

Fee and Payments

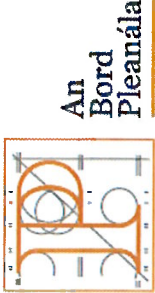
Specified Body	No
Oral Hearing	No
Fee Calculation Method	System
Currency	Euro
Fee Value	0.00
Refund Amount	

Observation

--	--

Run at: 21/12/2022 14:59

Run by: Niamh Hickey



An Bord Pleanála

Lodgement ID	LDG-060149-22
Map ID	
Created By	Niamh Hickey
Physical Items included	No
Generate Acknowledgement Letter	
Customer Ref. No.	
PA Reg Ref	LRD6002/22S3

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

Observation/Objection Allowed?	Yes
Payment	PMT-047033-22
Related Payment Details Record	PD-046923-22

	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,
--	--

315183

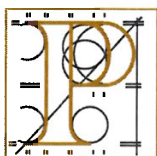
Residential tenant amenity spaces, a crèche and a 100 bed nursing home. The site will accommodate 520 no. car parking spaces, 1574 no. bicycle parking spaces, storage, services and plant areas. Landscaping will include extensive communal amenity areas, and a significant public open space provision. 2. 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

Development Description

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.

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 will integrate 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.foxlandsrld2022.ie.
Applicant	
Additional Supporting Items	



An
Bord
Pleanála

Planning Appeal Online Observation

Online Reference

NPA-OBS-001645

Online Observation Details

Contact Name

john Leslie

Lodgement Date

21/12/2022 12:16:56

Case Number / Description

315183

Payment Details

Payment Method

Online Payment

Cardholder Name

john Leslie

Payment Amount

€50.00

Processing Section

S.131 Consideration Required

☐

Yes — P.T.O.

☐

N/A — Invalid

Signed

EO

Date

File With

SECTION 131 FORM

Appeal No

ABP—

Defer Re O/H

☐

Having considered the contents of the submission dated/received
 from I recommend that section 131 of the Planning
 and Development Act, 2000 be/not be invoked at this stage for the following reason(s):

Section 131 not to be invoked at this stage.

☐

Section 131 to be invoked — allow 2/4 weeks for reply.

☐

Signed

EO

Date

Signed

SEO/SAO

Date

M

Please prepare BP — Section 131 notice enclosing a copy of the attached submission.

To

Task No

Allow 2/3/4 weeks

 BP

Signed

EO

Date

Signed

AA

Date

John Leslie

224 Elm Mount Ave, Beaumont, Dublin 9.

21st December 2022

Strategic Housing Unit

An Bord Pleanála

64 Marlborough Street

Dublin 1

Re: Objection to Application Reference Number: 315183. Marlet. Saint Annes Park.

A Chara,

I am writing in relation to the planning application submitted by Marlet. for residential development on park lands to the rear of St. Paul's College, Sybil Hill Road, at St. Anne's Park, Raheny, Dublin 5. To this end, I enclose the requisite fee of €50.

I object in the strongest possible terms to the proposal to build residential units on the St Paul's Playing Fields at St Anne's, for the following reasons:

This land was originally part of the park and when acquired by the Vincentians, its envisaged sole use was as playing fields, not development. Up until 2001 it was considered by the public to be part of the park with no fence and no restrictions on entering. It is surrounded on three sides by parkland and on the fourth side by St. Paul's School. It is undeniably within the curtilage of St. Anne's Park which is a designated buffer zone for the Dublin Bay Biosphere.

The Environmental Impact statements provided by the developer are inaccurate, incomplete, overly partisan and not objective.

Wintering Bird Implications – Protected species including the Brent Geese will be adversely impacted by this development. Dublin City Council Parks and Landscape division describe the St. Paul's Playing fields as *'.....the most important ex-situ feeding site for Brent Geese in Dublin based on highest peak counts of Brent Geese, regularity of use, its geographical location in relation to North Bull Island, its size, and the relative lack of disturbance'*. An Bord Pleanála should mandate the completion of a Full Appropriate Assessment using independent objective analysis. In order for this planning application to succeed, the Stage 2 Appropriate Assessment *'.....must provide a clear conclusion regarding the absence of adverse effects on the integrity of European sites'*. The planners cannot rely on subjective and suggestive conclusions offered by the advisors paid by the developer to complete the Natura assessments and should seek further independent analysis. Any doubt about an adverse impact on these protected birds is sufficient to require the planning authorities to deny Planning Permission under the current legislation.

Likewise, there is insufficient analysis presented by the developer to assess the impact on Curlews. They are listed as a species of special conservation interest in the North Bull Island Special Protection Area. St. Anne's Park and St. Paul's Playing Fields are by far the largest of the five "Wet Lands" within the Dublin Bay Biosphere Catchment area. The peak observation of Curlews in St. Paul's playing fields of 86 is statistically significant in an Irish context and to ignore the Curlews in any Natura assessment is wrong. Equally at best cursory consideration is given to the bats that live on or traverse the lands in this application. No analysis is provided and no research was completed to see if protected bat species (EU Habitats Directive) who live in St Anne's Park are or will be impacted by this development. Finally, the protection of the protected

Holm Oaks and Pines along St. Anne's Avenue has not been considered sufficiently in the developer's proposals, in particular in regard to their root protection.

The potential impact to the Dublin Bay Biosphere is significant. The developer is relying on an agreement with Dublin City Council to divert waste water away from its natural path into the Naniken River and beyond that into the UNESCO nominated Dublin Bay Biosphere. This river system is already proven to be considerably polluted and regularly causes flooding and pollution in St. Anne's and onto the Clontarf Road. To allow this planning to proceed with any potential adverse impact on Dublin Bay Biosphere would be a dereliction of the planner's obligations. Explicitly any development should be required to reduce risk to the biosphere not increase it.

The developer has understated the likely landscape and visual impacts of the proposed development on St. Anne's Park. The nature and scale of the proposal does not integrate with the surrounding lands and does not properly assess the visual significance and sensitivity of the site. The most sensitive visual receptors, the walking view from the Avenue toward the playing fields and the fields to the north, pitches 1 and 2 (overlooked by 3 blocks of 8 storey apartments) are largely ignored. The photomontages provided by the developer are at best insufficient, more probably misleading. The use of terms such as 'glimpse views' are entirely inaccurate. The factual reality is that the existing visual experience from the Avenue will be largely eliminated and that the scale, height and bulk of the proposed development will negatively impact the Avenue and the northern playing fields, will be visually obtrusive and be out of character. This will seriously diminish the historic aesthetic character of the park and will cause loss or damage to its special character. The emotional reality is that a very fine historic avenue and park will be irretrievably damaged if any development is allowed to proceed in these fields.

Yours sincerely,

John Leslie

224 Elm Mount Ave

Beaumont

Dublin 9.

Phone. 0866045558.

Email. john@crossflow.ie