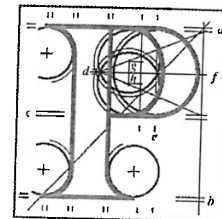


Our Case Number: ABP-315183-22

Planning Authority Reference Number: LRD6002/22S3



**An
Bord
Pleanála**

Michael Walsh
7 Vernon Rise
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,

David Behan
Executive Officer
Direct Line: 01-8737146

LRD40 Acknowledge valid observer submission

Tel
Glao Áitiúil
Facs
Láithreán Gréasáin
Ríomhphost

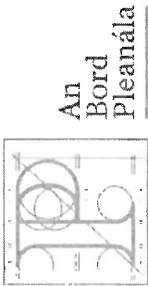
Tel
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www.pleanala.ie
bord@pleanala.ie

64 Sráid Maoilbhríde
Baile Átha Cliath 1
D01 V902

64 Marlborough Street
Dublin 1
D01 V902

Lodgement Cover Sheet - LDG-060143-22



Details

Lodgement Date	21/12/2022
Customer	Michael Walsh
Lodgement Channel	In Person
Lodgement by Agent	No
Agent Name	
Correspondence Primarily Sent to	
Registered Post Reference	

Lodgement ID	LDG-060143-22
Map ID	
Created By	Klaudia Wieszowska
Physical Items included	No
Generate Acknowledgement Letter	
Customer Ref. No.	
PA Reg Ref	

Categorisation

Lodgement Type	Observation / Submission
Section	Processing

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

Fee and Payments

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

Observation/Objection Allowed?	
Payment	PMT-047027-22
Related Payment Details Record	PD-046917-22

Observation

315183 LDG 602/22-83
LDG 40 to issue.

PA Case Number	
PA Decision Date	
County	
Development Type	
Development Address	
Appellant	
Supporting Argument	

Development Description	
Applicant	
Additional Supporting Items	

7 Vernon Rise,
Clontarf,
Dublin 3.

21st December 2022

An Bord Pleanála,
64 Marlborough Street,
Dublin 1.

Appeal Ref. No. LH29N-315183-22

Dear Sir/Madam,

Development of 580 Apartments on lands to the east of St Paul's College, Raheny

Observations of Michael Walsh

I wish to submit observations on the above development which is the subject of an appeal against the decision of Dublin City Council to refuse permission for the development. These observations are set out in an attachment to this letter. The appropriate fee is also attached.

Yours sincerely,

Michael Walsh
Michael Walsh

AN BORD PLEANÁLA			
LDG-	060 143-22		
ABP-			
21 DEC 2022			
Fee: €	50	Type:	cash
Time:	14.18	By:	hamed

1. Name of the
2. Address
3. City

4. State

5. Zip
6. Country

7. Telephone

8. E-mail

9. Name of the person to whom the order should be sent

10. Name of the person to whom the order should be sent

11. Name of the person to whom the order should be sent
12. Name of the person to whom the order should be sent
13. Name of the person to whom the order should be sent

14. Name of the person to whom the order should be sent
15. Name of the person to whom the order should be sent

AN BORD FILIALA	
LEK:	_____
ABP:	_____
21 DEC 2022	
Fee: €	Type: _____
Time:	By: _____

**APPEAL BY RAHENY 3 LIMITED PARTNERSHIP AGAINST DECISION TO REFUSE
PERMISSION FOR DEVELOPMENT OF 580 APARTMENTS ON LANDS EAST OF ST
PAULS COLLEGE, SYBIL HILL ROAD, RAHENY, DUBLIN 5
Appeal Ref. No: LH29N-315183-22**

Observations of Michael Walsh

This is the latest in a series of applications for major residential developments on this site. The planning history has been well documented and the purpose of this observation is to draw attention to a number of relevant issues to which the Board might reasonably have regard in their consideration of this appeal.

Background

The site was originally part of the Guinness estate and was allocated to St Paul's College as football pitches; the larger part of the estate having become St Anne's Park. The layout of the broader area dates essentially from the mid-twentieth century. Much of the residential development in the area comprises terraced housing at a moderate density but there are many recent infill developments. There is a wide range of retail facilities and services in the area. There is also a wide range of educational facilities. These include the adjoining boys' secondary school and a boys' national school nearby. Further schools in the general area include girls' and mixed national and secondary schools.

The site of the proposed development had been given the Z15 zoning, which provided for limited other classes of development to be "open for consideration." A relevant consideration was the situation whereby the institution in question had no further need for the land in question. The use of this site as an ex-situ site by the wintering Brent Geese has been a significant consideration in previous decisions relating to this site.

Current Application

This provides for a high-density apartment development with blocks of up to seven storeys in height. The planning authority decided to refuse permission for just one reason, to the effect that it has not been demonstrated that no impact arises to the Dublin Bay populations of protected Brent geese and therefore that the proposed development would materially contravene Policy GI23 of the Dublin City Development Plan 2016-2022 for the protection of European sites.

Consideration by Board

The likely effect of the development on populations of Brent geese is clearly a material consideration in this case but the Board are also obliged to consider all relevant planning issues. The remainder of this observation seeks to draw attention to a range of issues which might reasonably be considered by the Board in their determination of this appeal.

Impact on Brent Geese

This site is clearly of significance as an ex-situ site for the migrating Brent geese. It is one of a number of such sites. The problem is that the migratory patterns of the geese could change over time and, were such changes to be significant, then there would appear to be no obstacle in the way of the proposed development. In any case the assessment of the effects on the geese population is likely to be finely tuned. I would add that I have seen the Brent geese on several occasions. On the last occasion they were congregating on the football pitch of St Paul's College rather than on the site of this development.

Zoning

The zoning of the site has recently been changed to zoning for *amenity / open space*. Residential development is clearly inconsistent with this zoning and any grant of permission for such development would be a material contravention of the Development Plan. The point remains that the Board do have the power to grant permission for such a development, but only where certain specified criteria can be satisfied. In this case the acute need for housing, particularly in the Dublin area, could well be regarded as an overriding factor which could justify a material contravention. Clearly this is something to which the Board should have regard.

Visual Impact

This location, beside St Anne's Park, is visually sensitive and the impact of any large development on the visual amenities of the park is a material consideration. The aspect of the development from the main avenue of St Anne's is a matter of particular concern. Regard has been given to this issue but the height of some of the blocks is significant and it might be questioned whether blocks of such height are necessary.

Transport

The proposed access on to Sybil Road is well located. This road is of a good standard and its capacity to cope with the additional traffic is not in question. It might be noted that, while there are frequent bus services on the Howth Road, there is not a direct walking route to Harmonstown Dart station.

Residential Unit Mix

This is a critical issue which needs to be scrutinised. The first issue is the allocation of all units to apartment development. It would not be reasonable to expect that the development be confined to housing units but the problem with apartment developments, particularly where height is involved, is that construction costs are generally higher. That would affect affordability and reduce the contribution of the development towards relieving the housing problem. It is noted that, in one of the previous applications, it was proposed to provide 104 houses.

The second issue arises from the widespread availability of schools in the immediate vicinity of this area. It appears to me to be a relevant issue that the mix of accommodation should be orientated towards accommodating families with children of school-going age. To achieve this, there should ideally be some provision of houses in the development and, in any case, the mix of unit sizes would need to be balanced towards a much higher proportion of three-bed units. I would add that this area is in the middle suburbs and that the mix proposed would be more appropriate to the Inner City.

Conclusions

The above in my opinion are some of the issues which are likely to arise in the Board's consideration of this appeal. In particular, a case could be made for the provision of some development on this site, having regard to the need for housing provision in the more established suburbs but subject to measures to protect the amenities of St Anne's Park and to ongoing reviews of the role of this site as an ex-situ site for the Brent geese populations.

From: Michael Walsh
7 Vernon Rise
Clontarf
Dublin 3.