

File With _____

Appeal NO: ABP 321465

Defer Re O/H

TO:SEO

Having considered the contents of the submission dated/ received 28/7/25
from

J. Beades I recommend ~~to~~ not to circulate at this stage for the following

reason(s): no m issues

E.O.: [Signature]

Date: 30/7/25

To EO: _____

TO BE CIRCULATED Y/N

S.E.O.: _____

Date: _____

S.A.O.: _____

Date: _____

M _____

Please prepare SC _____ - enclosing a copy of the attached submission

to: _____ Task No: _____

Allow 2/3/4weeks - SC _____

EO: _____

Date: _____

AA: _____

Date: _____

File With _____

CORRESPONDENCE FORM

Appeal No: ABP 321465

M _____

Please treat correspondence received on 28/7/28 as follows:

1. Update database with new agent for Applicant/Appellant _____	1. RETURN TO SENDER with BP _____
2. Acknowledge with SC <u>20</u>	2. Keep Envelope: <input type="checkbox"/>
3. Keep copy of Board's Letter <input type="checkbox"/>	3. Keep Copy of Board's letter <input type="checkbox"/>

Amendments/Comments

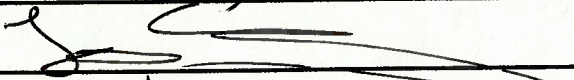
Further resp

** To be scanned*

4. Attach to file

- (a) R/S
- (b) GIS Processing
- (c) Processing
- (d) Screening
- (e) Inspectorate

RETURN TO EO

	Plans Date Stamped <input type="checkbox"/>
	Date Stamped Filled in <input type="checkbox"/>
EO: 	AA:
Date: <u>30/7/28</u>	Date:

AN COIMISIÚN PLEANÁLA
LDG- _____
ACP- _____
28 JUL 2025
Fee: € _____ Type: _____
Time: 9:30 By: Letterbox

23 Richmond Ave,
Fairview,
Dublin 3
25th July 2025

An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902

Re: St. Margaret's Recycling & Transfer Centre Ltd, Sandyhills Planning Reference SU06F.321465

Dear Sirs,

I refer to your letter dated the 7th of July 2025, which refers to the substitute consent of the waste recycling and transfer facility remedial EIAR and remedial NIS submitted with application Sandy Hill, ST. Margaret's County Dublin K60 7EW 73, seeking comments in relation to a letter ,dated the 26th of June 2025 from the Department of Housing, Local Government and Heritage under reference noted above of ABP-321465-24.

I actually find it very surprising that the situation in relation to the illegal activities on site, and refusal of the applicants to accept that the planning rules have been breached ignored in relation to the activities on site which have led to prosecutions that were brought before the courts by the local authority Fingal County Council The applicants were convicted of breaching the environmental rules on the site. I am unaware of the legal consequences should the Planning Commission concede to a ruling for substitute consent in a situation where additional prosecutions could be brought by the local authority for knowingly and continuously breaching planning and waste conditions for this site.

The applicants have already breached the conditions of Planning sat out previously to return the 1.1 ha section of the development site to agricultural land. The land in all instances and enforcements should be returned to agricultural land without any impingement whatsoever or any excuse that was previously heralded by the applicants or their new consultants as being a remedy to the planning breaches.

The Department do not want the sowing of any non-locally sourced wildflower seed to the area of the hardcore in southeastern section. The applicants will be required/obliged to return the land to agriculture use and natural dispersal of seed will only occur when this crushed concrete which is not natural hardcore is removed by the applicants and all other anthropogenic material is removed, and topsoiling replaces the underlying crushed concrete.

The new permit application submitted by the applicants contains a witnessed declaration to the Garda that everything relating to the site was in order, this declaration was in correct as established by the ABP 321465-24 and the applicants have not returned these land to their natural state and all contamination should be removed as part of the refusal and the housing departments request adjusted for the removal of hardcore to maintain the genetic integrity of locally occurring populations of wildflower species or grasses requested by DAA also. The rewarding of planning and permit violations cannot be allowed, and substitute consent should not be probation act for non-compliance and convictions.

Accordingly, I request that the application be refused.

Your Faithfully

J Beades PC

LETTERBOX