

**PLANNING APPLICATION FOR
STRATEGIC HOUSING DEVELOPMENT
RESPONSE TO AN BORD PLEANÁLA OPINION
ST. PAUL'S COLLEGE,
SYBIL HILL RD, RAHENY, DUBLIN 5**

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**Brady Shipman
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1 INTRODUCTION

Brady Shipman Martin have prepared this Response to the Opinion of An Bord Pleanala (ABP), dated 17th July 2019, in relation to Pre-Application Consultation Reg. Ref 304524-19 for development at Lands east of St. Paul's College, Sybil Hill Road, Raheny, Dublin 5. This Response has been prepared under Article 285(5) (b) of the Planning and Development (Strategic Housing Development) Regulations 2017 in association with the Applicant and Design Team and also provides the specific information as requested by the Board.

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2 RESPONSE TO AN BORD PLEANALA

In its Opinion of 17th July 2019, ABP set out 3 no. items that should be submitted with any application for development. Our response to these items is set out below and cross referenced to the Design Team Reports.

2.1 Natura Impact Statement (NIS)

Item 1 of the ABP Opinion states:

1. Natura Impact Statement (NIS) to assess potential effects on relevant designated sites with regard to their conservations objectives, including potential effects associated with the usage of the development site by specific species for winter feeding. Particular attention is drawn to the reasons for refusal issued in relation to ABP-302225-18, relevant points raised by statutory consultees and the planning authority, all in order to prepare a comprehensive and suitably robust NIS. All relevant research and field survey result should be attached as appendices.

A Natura Impact Statement (NIS) was prepared by Enviroguide Consulting as part of this application, which appraises the potential impacts of the Proposed Development on the relevant designated Natura 2000 sites. This included an assessment of any potential effects on specific species that may use the Proposed Development site for winter feeding (known as ex-situ feeding).

The authors of the NIS concluded that, in relation to Light-bellied Brent Goose (*Branta bernicla hrota*) and based on the best and most recent scientific information available, including the analysis of the information contained in the NIS, the loss of ex-situ inland feeding habitat at St Paul's as a result of the proposed development will not adversely impact on the

conservation objective attributes of Light-bellied Brent Geese. (Reason for refusal number 2).

The authors of the NIS also conclude that, while an existing foraging resource for other SCI species (i.e. Curlew, Oystercatcher, Black-tailed Godwit and Black-headed Gull) will be lost as a result of the proposed development, the results of wintering bird surveys at the site have demonstrated that this site is not of importance for any of these species. Therefore it has been determined that the loss of ex-situ habitat will not impact on the conservation objective attributes of any of the SCI species recorded at the proposed development site. (Reason for refusal number 1).

It is therefore concluded, on the basis of objective information that the possibility of effects from the Proposed Development on any Natura 2000 site can be ruled out.

2.2 Planning Report

Item 2 of the ABP Opinion states:

2. A planning report that includes:

a) Detailed chronology of all relevant planning applications on or adjacent to the site, including legal challenges or judgement as appropriate.

The Planning Report that is included as part of this application includes a detailed chronology of all relevant planning applications on or adjacent to the site, including legal challenges or judgements. This is set out in Section 3.1 of the Planning Report.

b) An up to date planning report should also include all references to relevant guidelines and regulations published since the previous application was lodged.

The Statement of Consistency in tandem with the Planning Report includes all references to relevant guidelines and regulations published since the previous application was lodged.

c) A report and/or drawings that clearly show any changes between that previously applied for and that which it is now intended to apply for.

Drawings and accompanying text outlining the changes between the previous application (ABP Ref.: PL29N.300559 and PL29N.302225) is included in Section 4 of the Architects Design Statement (pages 12-14). The primary changes between the previous application and this application can be summarised as follows:

- Courtyard houses have been omitted to provide one large public open space.
- 25% Public open space has been provided in one large area instead of two smaller areas.

- Three additional apartment blocks are proposed.
- Apartment block height range has changed from 5-8 storey blocks to 5-9 storey blocks. 9 storey blocks are located in the centre of the site to minimise impact on surrounding areas.
- Road access has been minimised to only give access to basement ramp and surface parking to south west boundary creating a pedestrian dominated environment.
- Creche area has increased to provide required spaces for all 2 & 3 bed units.
- Distance between blocks has increased from 28 m to 30m to respond to increased height in key locations.
- Proposed unit numbers have increased from 536 units (104 houses & 432 apartments) to 657 apartments.
- Density has increased from 83 units per Ha to 103 units per Ha.
- Attenuation area has been relocated from St Paul's College sports pitch to communal open space within the site.
- Application red line boundary amended for outfall to Naniken River/ new pedestrian bridge in St Anne's park and drainage connection to Sybil Hill Road.

2.3 Taking in Charge Drawing

Item 3 of the ABP Opinion states:

3. A layout drawing that shows all relevant open space areas, roads and pedestrian linkages to St. Anne's Park proposed to be taken in charge by the planning authority.

A Taking in Charge Drawing (Drawing Ref. 305-00) prepared by Brady Shipman Martin is included in this SHD Application. It identifies that the Public Open Space, which represents 25% of the development site area and which is proposed as part of this application in the south east portion of the site is proposed to be Taken in Charge by Dublin City Council. This has been agreed with Dublin City Council prior to the making of this application.

3 CONCLUSION

The proposed redevelopment at St. Paul's College, Sybill Hill Road, Raheny, Dublin 5 represents an opportunity to deliver a new residential development offering a quality living environment, respectful of its context, site topography, and site character and in close proximity to public transport.

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and with all relevant national, regional and local planning policies and guidelines and that the development proposal responds to ABP's Opinion.