

**4185/15: Objection to Further Information Received (Article 35)**

Eoin ("Owen") O'Leary

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To: observations@dublincity.ie

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**18th September 2016**

Dublin City Council  
Planning Department  
Block 4, Ground Floor  
Civic Offices  
Wood Quay  
Dublin 8

Re: Objection to Further Information Received in relation to  
Planning Application Reference Number: 4185/15

A Chara,

I am writing in relation to Crekav Landbank Investments Limited's amended planning application submitted in response to Dublin City Council's request for information in relation to the proposal to construct 381 housing units and associated works on the St Paul's playing fields to the east of St. Paul's College, Sybil Hill Road, at St. Anne's Park, Raheny, Dublin 5.

I previously objected to the application (Reg Ref 4185/15) for development on these lands. A 20Euro observation fee was rendered in December 2015 for the invalidated planning application number 3899/15 (Authorisation Code: 057417). I request that this 20Euro fee be applied to this observation to the significant further information/revised drawings (Article 35) received by DCC for planning application 4185/45.

I wish to object in the strongest possible terms to the both the original and revised proposals to build on the St. Paul's Playing Fields at St. Anne's.

I am alarmed at the proposed foul sewer line located on the south side which runs parallel to the historic tree-lined main avenue in St Anne's Park. The "Tree File" and other Arboricultural documents submitted fail to recognize how priceless this tree amenity is: alternate plantings of *Quercus ilex* (Holm Oak), *Pinus nigra austriaca* (Australian Pine) and *Pinus radiata* (Monterey Pine); Planted ~1880 by Lord Ardilaun, it is the entire collection that is of value to the State and the people of Ireland as a landmark amenity and not just one particular tree. This proposed foul sewer line impinges on the proposed root protection area. I suggest that this root protection area (as proposed) and construction exclusion zone is very inadequate to protect the priceless Holm Oak-lined avenue.

We know that lateral tree roots commonly extend 2 to 3 times the drip-line (the edge of the branches); However, a recent scientific study of the Holm Oak found lateral roots extending 7 times the projection of the canopy, and were recorded up to 33 meters [Moreno, G., Obrador, J., Cubera, E. et al. Plant Soil (2005) 277: 153]. In the case of the historic St Anne's tree-lined avenue, lateral roots adjacent to the hard surface of the avenue would be expected to have limited root extension on that side, and this would be compensated for on the playing field side. Therefore we would expect an asymmetrical distribution of Holm Oak roots with substantial lateral root system extending well into the St. Pauls playing fields. Considering an asymmetrical distribution of the Holm Oak lateral roots, the required trenching for the proposed foul sewer line will cut critical supporting roots and create a greater stability concern (with regard to wind and rain) because of the historic hard surface avenue to the south, limiting root extension on that side.

Root pruning is more injurious to old mature trees than it is for younger more vigorous trees. The Holm Oaks here are perhaps 136 years and can live to 1000 years if protected. Even if Air-spade or a high pressure water device is employed, root damage will occur and sadly the Holm Oak is highly susceptible to the root rot fungus, *Phytophthora cinnamomi*.

With extensive lateral roots from the Holm Oak tree line running well into the St. Paul's playing fields, together with the findings of the wintering birds report, we must consider this area a silvo-pastoral ecosystem.

Not only will the proposed development result in significant and irreversible destruction of a valuable wildlife habitat directly connected to the Dublin Bay Biosphere, but will also have a negative impact on adjacent trees within St. Anne's Park. By denying this inappropriate residential development, Dublin City Council will preserve the St. Paul's playing fields in their long-standing semi-natural state, thus protecting an important green infrastructure and public amenity, but also protect the integrity of St. Anne's Park as a whole.

Yours Sincerely,

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September 17, 2016