

## Lianna Slowey

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**From:** Manager Dau <Manager.Dau@chg.gov.ie>  
**Sent:** Monday 5 February 2018 15:36  
**To:** Strategic Housing Unit  
**Subject:** ABP Ref: TC0023 ABP Case No: 300559 SHD St Paul's Raheny  
**Attachments:** TC0023 300559 NMS AHOU NPWS 5.2.18.pdf

ABP Ref: TC 0023  
ABP Case No: 300559  
Our Ref: SHD St. Paul's Raheny

A Chara,

Please find attached archaeological, architectural heritage and nature conservation observations/recommendations of the Department of Culture, Heritage and the Gaeltacht in connection with the above.

Can you please confirm receipt of same?

Le meas  
Sinéad

Sinéad O' Brien,  
Development Applications Unit,  
Department of Culture, Heritage and the Gaeltacht,  
Newtown Road,  
Wexford,  
Co. Wexford  
(053) 911 7528



An Roinn  
Cultúir, Oidhreachta agus Gaeltachta  

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Department of  
Culture, Heritage and the Gaeltacht

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Is faoi rún agus chun úsáide an té nó an aonán atá luaite leis, a sheoltar an ríomhphost seo agus aon comhad atá nasctha leis. Má bhfuair tú an ríomhphost seo trí earráid, déan teagmháil le bhainisteoir an chórais.

Deimhnítear leis an bhfo-nóta seo freisin go bhfuil an teachtaireacht ríomhphoist seo scuabtha le bogearraí frithviorais chun viorais ríomhaire a aimsiú.

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Cultúir, Oidhreacht agus Gaeltachta

Department of  
Culture, Heritage and the Gaeltacht

ABP Reference: TC0023  
ABP Case No: 300559  
Our Ref: SHD St. Paul's Raheny (*Please quote in all related correspondence*)

5<sup>th</sup> February 2018

The Strategic Housing Unit,  
An Bord Pleanála  
64 Marlborough Street,  
Dublin 1  
D01 V902

Via email: [strategichousing@pleanala.ie](mailto:strategichousing@pleanala.ie)

Re: Notification to the Minister for Culture, Heritage and the Gaeltacht under the Planning and Development (Housing) and Residential Tenancies Act 2016; Planning and Development (Strategic Housing Development) Regulations 2017

**Proposed Strategic Housing Development: proposed by Crekav Trading GP Limited for permission to construct 536 no. dwellings (104 no. houses, 432 no. apartments) on lands to the east of St. Paul's College at Sybil Hill Road, Raheny, Dublin 5.**

A chara

On behalf of the Department of Culture, Heritage and the Gaeltacht, I refer to correspondence received in relation to the above.

Outlined below are heritage-related observations/recommendations of the Department under the stated heading.

### **Archaeology**

The Department has examined the archaeological component of the EIAR (Section 11) submitted with the above planning application. On the basis of the information in the EIAR there are no archaeological objections to a grant planning subject to the implementation of the proposed mitigation measures (Section 11.5.4) at pre-construction and construction phases as conditions of any such grant.

**Reason:** To ensure the continued preservation (either *in situ* or by record) of places, caves, sites, features or other objects of archaeological interest.

### **Architectural Heritage**

#### **Context**

The context of the site is illustrated in the attached mapping which comprises several adjoining C18<sup>th</sup> estates including lands pertaining to Sybil Hill, Maryville and Furry Park – residences that may be considered as historic country villas set or orientated to take advantage of the scenic Dublin bay setting, taking their cue from the Marino Estate. Immediately adjacent to these C18<sup>th</sup> villas is St. Anne's Park, formerly the C19<sup>th</sup> Guinness estate added to the dominance and prestige

of their grounds by creating a planned cultural landscape with a number of features including a central formal axis, intersecting and radiating avenues or allées, planted trees belts and perimeters, landscape focal points and follies and lake – it is an important example of a significantly intact C19<sup>th</sup> landscape to the northern suburbs. The concept exploited by the Guinness estate was that of the 'a shared amenity' such as in the instance of Castletown and the Donacomper Estate in Celbridge where architectural features of the Donacomper Estate were integrated or borrowed as part of the overall Gothic River walk in Castletown. (Reference; **Landscape Design in Eighteenth-Century Ireland: Mixing Foreign Trees with the Natives**, by Dr. Finola O Kane.) The features of the C19<sup>th</sup> cultural landscape are integral to St. Anne's Park today whose character may be regarded as being defined by mature tree belts, 'parkland rooms' and the focal point of the formal tree-lined axis centered on the residence (historically lost).



The Current City Development Plan also recognises the importance of landscape as an important part of the quality of life for people everywhere— Policy G17 states,

*“To continue to protect and enhance landscape, including existing green spaces through sustainable planning and design for both existing community and for future generations in accordance with the principles of the European Landscape Convention.”*

The provision of high quality housing is understood as a development priority in the city. The subject site is defined in the Current City Development Plan as a ‘Hub’ (the largest, least fragmented continuous area of forest, wetlands, stream systems or other native landscape types). It is situated close to the recently designated Dublin Bay UNESCO Biosphere and within a suburban area understood to have evolved incrementally over time with residential developments layered over earlier landscaped estates.

St. Paul’s College with a private residence – Sybil Hill, a protected structure, are zoned under the current City Development Plan (2016 – 2022) as Z15; *Community and Institutional Resource Lands (Education, Recreation, Community, Green Infrastructure and Health), to protect and provide for institutional and community uses.*

The development plan states that ‘any proposed development for ‘open for consideration’ uses on part of the landholding, shall be required to demonstrate to the planning authority how the proposal is in accordance with and assists in securing the aims of the zoning objective.’

The Current City Development Plan/Development Standards provides assessment criteria for higher buildings and includes a number of assessment criteria;

- Relationship to context, including topography, built form, and skyline having regard to the need to protect important views, landmarks, prospects and vistas
- Effect on the historic environment at a city-wide and local level
- Relationship to transport infrastructure, particularly public transport provision
- Architectural excellence of a building which is of slender proportions, whereby a slenderness ratio of 3:1 or more should be aimed for
- Contribution to public spaces and facilities, including the mix of uses
- Effect on the local environment, including micro-climate and general amenity considerations
- Contribution to permeability and legibility of the site and wider area
- Sufficient accompanying material to enable a proper assessment, including urban design study/masterplan, a 360 degree view analysis, shadow impact assessment, wind impact analysis, details of signage, branding and lighting, and relative height studies
- Adoption of best practice guidance related to the sustainable design and construction of tall buildings
- Evaluation of providing a similar level of density in an alternative urban form

## **Recommendations**

The Applicant has provided a masterplan for the proposed residential development which in layout may be described as a dense and robust scheme providing a range of building types with the very high monolithic blocks (8-storey) set in close proximity to the protected structure and connected to the Howth Road. Towards the south boundary of the site amenity/recreational spaces have been

indicated adjacent to the college bounded by densely courtyard blocks (104 No. units) immediate to the formal avenue/vista of the C19<sup>th</sup> St. Anne's residence.

An integrated approach allowing conservation practice to be part of distinctive and successful planning and development is guided by the Architectural Heritage Protection Guidelines for Planning Authorities (2004, re-issued 2011) and published policy ('The Government Policy on Architecture 2009-2015 and Shaping the Future - Case Studies in Adaptation and Reuse in Historic Urban Environments, the Department, outlines the following observations/recommendations to ensure sustainable development with the architectural heritage as an integral part of an over-arching urban design response. Given the perceived significance of the site this Department asks that a request for Further Information be sent to the applicant, asking that a full impact assessment (to include all relevant information) be carried out of the proposed impact of development in the historical context. The assessment should, among other aspects, include

1. The overall understanding of the cultural landscape of St. Anne's park in relation to the subject site indicating the layering and interrelationship of the respective historical sites, including historical interventions, landscape features, planting schemes, views vistas, boundaries and access points to inform the appropriate scale and design of the proposed of development within this context.
2. A visual and architectural impact assessment of the impact of the proposed development on the integrity, significance and character of the cultural landscape of St. Anne's Park based on the above.
3. The selected views from the formal avenue within St. Anne's Park of the proposed courtyard housing to be illustrated (other than a red line) the impact of the proposed development in greater detail in order to assess the scale and materiality of the development including the proposed boundary treatment, the impact of extensive areas of hard landscaping, road access and parking associated with the housing courtyard immediate to the formal axis of St. Anne's Park.
4. The Applicant to justify the transition from local scale to monolithic block as appropriate to the evolution of the historic environment and to indicate how the proposed design meets the 'assessment criteria for tall buildings'/Dublin City Development Plan 2016 - 2022 in terms of scale, girth and character.

This Further Information should be referred by the planning authority to this Department for evaluation and comment as appropriate. It is this Department's view that this information is necessary in order to allow an informed decision to be made on the appropriateness of the proposed development.

It is this Department's recommendation that no decision to grant permission should be taken until the above information has been received and fully evaluated by both the planning authority and this Department.

### **Nature Conservation**

The main concern of this Department with regard to this proposed development is ex-situ impacts on Light-bellied Brent Geese, a listed species of Special Conservation Interest for a number of Special Protection Areas (SPAs) designated under the Birds Directive in the vicinity of the proposed development. These sites include Malahide Estuary SPA, Rogerstown Estuary SPA, Skerries Islands SPA, South Dublin Bay and River Tolka Estuary SPA, Baldoyle Bay SPA and North Bull Island SPA. The NIS submitted with this application shows that birds currently using the



St. Paul's site for feeding also use Malahide Estuary SPA, Rogerstown Estuary SPA, South Dublin Bay and River Tolka Estuary SPA, Baldoyle Bay SPA and North Bull Island SPA. There is therefore a potential ex-situ impact on at least all these SPAs.

Out of the aforementioned SPAs where Brent goose is a listed interest and in terms of proximity to St. Paul's College the latter three are of most relevance. Documents supporting the conservation objectives for Baldoyle Bay SPA and for the two Dublin Bay SPAs (namely North Bull Island SPA and South Dublin Bay and River Tolka Estuary SPA) are available on the NPWS website at the following locations:

[https://www.npws.ie/sites/default/files/publications/pdf/004016\\_Baldoyle%20Bay%20SPA%20Supporting%20Doc\\_V1.pdf](https://www.npws.ie/sites/default/files/publications/pdf/004016_Baldoyle%20Bay%20SPA%20Supporting%20Doc_V1.pdf)

and

[https://www.npws.ie/sites/default/files/publications/pdf/North%20Bull%20Island%20SPA%20\(004006\)%20Conservation%20Objectives%20supporting%20document%20-%20\[Version%201\].pdf](https://www.npws.ie/sites/default/files/publications/pdf/North%20Bull%20Island%20SPA%20(004006)%20Conservation%20Objectives%20supporting%20document%20-%20[Version%201].pdf)

Both documents describe that the relevant Brent goose populations are considered to have increased in recent years and both these documents contain the following text:

*"Ex-situ factors: several of the listed waterbird species may at times use habitats situated within the immediate hinterland of the SPA or in areas outside of the SPA but ecologically connected to it. The reliance on these habitats will vary from species to species and from site to site. Significant habitat change or increased levels of disturbance within these areas could result in the displacement of one or more of the listed waterbird species from areas within the SPA, and/or a reduction in their numbers"*

This is particularly relevant in the case of Brent geese that are known to both roost within the SPA and also feed, to some degree, within the wetland areas of the SPAs. Over the last 30 years or so Brent geese have begun to rely on feeding in Dublin's amenity grasslands and agricultural fields. The NIS, through direct survey and a review of previous collected data, consider the grasslands of St. Paul's College to be of major importance for Brent geese.

In order to conclude an Appropriate Assessment on the proposed development, which, if granted, would reduce both the quantity and quality of the feeding resources for Brent geese at St. Paul's to a significant degree, An Bord Pleanála would need to consider the following:

- the Brent goose population listed for North Dublin Bay SPA is now reliant, to a large degree, on the availability of suitable grassland feeding resources within the Dublin area outside of the SPA network;
- in order for a particular area to be a potentially suitable feeding resource for Brent geese, the overall size of the grassland site, the degree of fragmentation of the grassland resource caused by the presence of internal boundaries/vegetation, the quality and management of the grassland sward, relatively low levels of anthropogenic disturbance and its proximity to the SPA and other alternative feeding areas all need to be at suitable levels;
- the extent of potentially suitable feeding areas within Dublin City is finite; and that
- the currently recognised feeding sites listed in the NIS, that are considered to be an alternative to the lands at St. Paul's, may be currently experiencing pressures, including recreational disturbances, that may limit their capacity to accommodate the loss of such a resource likely to occur as a result of the proposed development.

Therefore particular emphasis needs to be placed on the cumulative impact aspects of the Appropriate Assessment.

An Bord Pleanála's appropriate assessment will need to consider the findings detailed in the NIS, and this Department's submission, in view of the potential impact on the conservation objectives of the European sites in question to maintain the favourable conservation condition of Light-bellied

Brent Goose and those of the other listed species of special conservation interest. This proposed development, and its potential effects on site integrity, will also need to be considered in An Bord Pleanála's appropriate assessment in combination with other consented developments and plans, as cumulative effects may arise.

With regard to cumulative effects it should be noted that amenity parks and grass sports fields provide valuable Brent Geese feeding areas, and that replacing grass sports fields with all-weather pitches, or providing new all-weather pitches, in schools or in parks managed by the Local Authority, will also result in a loss of Brent Geese feeding. In addition, when reaching a decision An Bord Pleanála should consider whether adequate areas will be left for Brent Geese feeding into the future, and whether lands are zoned appropriately in relevant County Development Plan and Local Area Plans to ensure that the Local Authorities comply with the Birds Directive.

You are requested to send further communications to this Department's Development Applications Unit (DAU) via *eReferral*, where used, or to [manager.dau@ahg.gov.ie](mailto:manager.dau@ahg.gov.ie); if emailing is not possible, correspondence may alternatively be sent to:

The Manager, Development Applications Unit (DAU), Department of Culture, Heritage and the Gaeltacht, Newtown Road, Wexford, Y35 AP90

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Suzanne Nally,  
Assistant Principal,  
Development Applications Unit