



MINISTER OF STATE  
AODHÁN Ó RÍORDÁIN TD

Dublin City Council  
Planning Department  
Block 4, Ground Floor  
Civic Offices  
Wood Quay  
Dublin 8  
D08 RF3F

26 November 2015

Dear Sir/Madam,

**RE: Submission of objection to Planning Application Ref. 3899/15**

As public representatives for the local area, we are objecting to Planning Application Ref. 3899/15 on the following grounds.

**Breach of Z15 Zoning Regulations**

- The land concerned is zoned Z15 which is reserved as Community and Institutional Resource Lands (Education, Recreation, Community, Green Infrastructure and Health). Under the terms of Z15 zoning, residential development is “open for consideration.”
- It should be noted that there is an emphasis on the development plan on the importance of Z15 lands as a resource for the city in providing educational, recreational, community and health facilities, and in the maintenance and creation of sustainable, vibrant neighbourhoods and a sustainable city. (Source – **Dublin City Development Plan 2011-2017 – Chapter 15 – Land Use Zoning**)

The planning application is in breach of Z15 Zoning requirements.

- The application proposes the construction of 381 housing units.
  - Z15 zoning stipulates that residential development is only “open for consideration.” In that context, development of this type is excessive.
  - This is a medium density housing development application and would therefore be more suitable for lands designated as Z1 (residential).
  - The construction of 381 housing units is far in excess of what could be considered reasonably necessary to maintain the existing educational, recreational, community and health facilities on this site, and is likely to impact negatively upon them due to the net loss in existing green open space.
  - According to the Development Plan, any “open for consideration” use must not be in conflict with the overall policies and objectives for the zone.

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MINISTER OF STATE FOR NEW COMMUNITIES, CULTURE, EQUALITY AND DRUG STRATEGY

<b>Constituency Office</b>	<b>Ministerial Office</b>
Dublin Bay North Labour Party	Department of Justice and Equality
203 Philippsburgh Avenue	Bishop's Square
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- The application fails to provide the required 25% of land being reserved for open space and/or community facilities.
  - Both the multi-purpose sports hall and the two all-weather playing pitches will not be fully accessible and open to the public.
  - The land reserved for the open space and/or community facilities is fragmented and in reality does not provide for any open or public space.

### **Potential Impact on Bull Island Biosphere**

- This development has the potential to impact negatively on the migration patterns and habits of the Brent Geese, which migrate to Bull Island every winter.
- National and European Legislation form the basis of protection for our most valuable natural resources, such as Bull Island.

Under this legislation, Bull Island is designated as a:

- (i) Special Protection Area under the EU Birds Directive to support populations of birds of particular species;
  - (ii) Candidate Special Area of Conservation wildlife conservation areas to support habitats and plant and animal species and;
  - (iii) Proposed Natural Heritage Areas area of nationally important natural or semi-natural habitats, landforms or physical features, wild plant and animal species or a diversity of these natural attributes.
- Bull Island has also been assigned additional designations including Nature Reserve, Ramsar site (under the Ramsar Convention on Wetlands of International Importance), Wildfowl Sanctuary, UNESCO Biosphere Reserve, and a Special Amenity Area Order. **(Source – Dublin City Development Plan 2011-2017, Chapter 6 “Greening The City.”)**
  - The Brent Geese have been shown to use this portion of land regularly during their winter migration period in Ireland. A development of this size and nature has the potential to displace them and negatively impact on the biosphere, which is specifically protected under the provisions of the Dublin City Development Plan. Further information should be requested from the developer to indicate how they propose mitigating or avoiding any such displacement of the Brent Geese.
  - In Chapter 6 (Greening the City) of the Dublin City Development Plan it states *"Protecting and enhancing open spaces for both biodiversity and recreational use has benefits for the city's sustainability and attractiveness as a place to live, work and visit."* This planning application would see a reduction of approximately 8% in the green area and so is not in accordance with this statement

### **Impact on local services, amenities, traffic, flooding and drainage**

#### ***Traffic/Supporting amenities***

- The impact such a large housing construction will have on local services and amenities must be considered. Local schools at present will not be able to facilitate a large increase in the local population.
- This development would add to the current high level of traffic that currently exists on both the Howth Road and Sybil Hill Road, without any plans to increase the capacity of local roads.

### ***Flooding/Drainage***

- The increased flood risk and drainage capacities are very serious issues which must also be taken into account when considering the impact that this construction would have on the local landscape. This would have a negative effect regarding drainage and flooding.
- DCC have already confirmed in letter reference **130818CE MTS File 13A** by Ken Hand of 18th August 2013 that pipes in Vernon Avenue have insufficient capacity. Adding the rainwater collection area of the 381 new dwellings and the hard standing areas will considerably exacerbate the problem and lead to even more flooding.

The very principle of the development is to be questioned. These lands are an area of visual beauty and have a long-standing use for recreational and leisure purposes enjoyed by local residents and many from further afield. Such a large housing development in this area is not in keeping with the zoning objective of the land nor with the overall plan for the area.

We ask that the Planning Department refuse permission for this application.

Yours sincerely,

**Aodhán Ó Ríordáin TD**

**Cllr Jane Horgan-Jones**