



An Roinn  
Cultúir, Oidhreachta agus Gaeltachta

Department of  
Culture, Heritage and the Gaeltacht



**Planning Ref:** 3777/17

*(Please quote in all related correspondence)*

06 October 2017

Director of Services-Planning  
Dublin City Council  
Civic Offices  
Wood Quay  
Dublin 8

Re: Notification to the Minister for Culture, Heritage and the Gaeltacht under Article 28 (Part 4) or Article 82 (Part 8) of the Planning and Development Regulations, 2001, as amended.

**Proposed Development:** Planning application 3777/17 by Orsigny Company Limited by Guarantee for the demolition of 3 no. existing school (and school related) structures comprising prefab classrooms, a disused classroom block and a changing room block; Construction of a 2-storey sports hall accommodating double height play courts, fitness suite, changing rooms and ancillary facilities; Construction of 2 no. all-weather playing pitches comprising 1 no. championship sized floodlit playing pitch and 1 no. 5-a-side sized floodlit playing pitch with associated ball stop netting, boundary fencing and landscaping; Provision of car parking (24 spaces) and coach set-down (3 bays) along realigned internal access road to south of St. Pauls College with vehicular access from existing entrance to Sybil Hill Road; Cycle parking, boundary treatments and all associated site works and services at St Pauls College, 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(s).

#### **Nature Conservation**

It is noted that the location of the proposed development, Demolition of 3 no existing school and school related structures comprising of prefab classrooms, a disused school block and a changing room block, construction of a two storey sports hall accommodating double height play court, fitness, changing rooms and ancillary facilities, construction of two all-weather playing pitches comprising of one championship sized floodlit playing pitch with associated ball stopping netting, boundary fencing and landscaping, provision of car parking (24 spaces) and coach set down (3 bays) realigned internal access road to the south of St Pauls College with vehicular access from existing entrance to Sybil Hill Road, cycle parking, boundary treatments and all associated works is situated *in a location likely to impact on* the North Bull Island, SPA , site code no. 004006. Please see the attached site synopsis for a description of the site.

**This Department is of the view that this development:**

- Has a potential to disturb the feeding habitat of a significant population of light bellied Brent geese which is listed under Annex II of the EU Birds Directive (Council Directive 79/409/EEC).

**This potential impact would be caused by the:**

- Loss of feeding habitat.

The proposed development will result in the permanent loss of feeding habitat for the pale bellied Brent Geese. The numbers recorded in the report provide are well above the international importance numbers for the species and represent approximately 50% of the roosting flock associated with the North Bull island Spa (004006). It is noted that there is an adjacent proposed strategic housing development which will also impact on the feeding habitats of the geese.

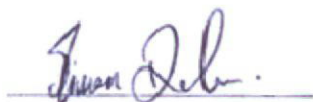
Amenity parklands and grass football pitches are valuable feeding areas for geese. The replacement of them with all- weather pitches results in loss of feeding areas. This forces the geese to travel greater distances to feed and potentially bring them into conflict with agricultural interest feeding on winter cereal crops. This results in greater expenditure in energy which impacts on the condition of the birds and their ability to complete the annual migration to their breeding grounds.

There is now a wealth of information on Brent geese feeding areas in the Dublin area. In any decision made by the local Authority on this application and future applications, the cumulative existing impacts on the Brent geese needs to be taken into consideration. In addition the Local Authority need to ensure that adequate areas are left for the Brent Geese feeding and that such areas are zoned appropriately in its county Development plans and any local area plans. The Local Authority is obliged to comply with its obligations to the Birds Directives.

You are requested to send further communications to this Department's Development Applications Unit (DAU) via **eReferral**, where used, or to [manager.dau@ahq.gov.ie](mailto:manager.dau@ahq.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

Is mise, le meas



Simon Dolan  
Development Applications Unit