

To An Bord Pleanala

Re: Plan number 2935/20 proposed hotel by applicant GAA

Request for leave to appeal

From Forest Friends Ireland Limited

Forest Friends Ireland 40 Lower Drumcondra Road-Submission to An Bord Pleanala, including a comprehensive list of representations, observations, objections with regard to the GAA planning application for a hotel at Clonliffe Road

Forest Friends Ireland assumed and were convinced in our own minds that because of what we believe to be the inadequacy of the proposals that additional information would have been requested or that refusal would have been the decision made by Dublin City Council. Forest Friends Ireland hereby makes representation and makes this submission in order to influence An Bord Pleanala and refuse planning permission for the following reasons:

1. The site of the planning application is part of a unique city riparian site
2. This very extensive site, of which the present application is part, is hugely important in terms of climate change. The site is unspoiled by development. It's several buildings of a certain architectural merit, were specially designed to fit into the landscape Forest Friends Ireland are not aware of another extensive and unspoiled site as this one within the boundaries of Dublin City.
3. The site of which it is a part is an extensive natural looking site with mature woodland, mature hedgerows and a unique variety of imposing mature trees. The application proposes to fell quite a number of these trees
4. The proposal represents bad planning because of its height bulk and proximity to the existing low rise residential dwellings. The scale density and design are out of character and consequently incongruous
5. There is no public transport on Clonliffe Road. The proposal represents the start of a high density ethos.
6. Piece meal development by taking a part of this site and leaving the rest, the majority of the site would condone the splitting of the site and invite the possibility of piecemeal development to be further promoted.
7. The site is unique due to the extent of the Tolka River bordering the site in an unspoiled riparian extender area with mature hedgerows giving it a unique character in the context of Dublin city
8. The proposal run contrary to the local area plans, ministerial guidelines, the Dublin city Development Plan, and the master plan for the area.
9. The Tolka means the flood and there have been very serious flooding on the river in recent years. The extensive grassed areas of this site offers excellent porosity and for that reason most of the site should be preserved as existing with the extensive grassed

areas maintained as such. Piecemeal development of parts of the site will fly in the face of this function.

10. Up to recently the main gate on Clonliffe Road was open and the public had access to it on a daily basis and made use of it to walk themselves and to walk their dogs
11. The agreement which the GAA and the catholic church had been described in the media as a “sweetheart deal.” A sweetheart deal will not make for good planning standards.
12. The proposal will devalue houses on Clonliffe Road, a road which has preserved its fine designer character. Developments such as the one proposed, which is the thin edge of a wedge will change the character of this fine urban street forever and to its detriment and the detriment of good design in Dublin City
13. Forest Friends Ireland has their offices at 40 Lower Drumcondra Road, a stone’s throw from this site. In the summer months we can have up to 50 international students as interns with us. One of the highlights of their internships was to visit this site and study the ecology of this site, as one of their assignments, which is unique in the Dublin urban context
14. The design of the proposal is substandard and incongruous in the context of the somewhat classical street and the urban landscape and streetscape. It may be best described as a ‘legoland’ intrusion.
15. Forest Friends Ireland is aghast at the failure of the proposed development to preserve the trees which were clearly earmarked for preservation in a previous report by their agents. These trees are in excellent condition and make a major contribution to this city landscape. Forest Friends Ireland has studied both the trees on the site and the fine hedgerows along this section of the Tolka The agents of this site have a very poor record in recent years and totally devastated a very diverse site with rich flora and fauna and many mature trees on a site in the ownership of the owners of the present application site. Forest Friends Ireland has photographic evidence of the site which was wantonly devastated about four years ago. Aerial photos will show what we refer to.
16. This unique site should have a detailed environmental impact study far in excess of what is on offer and identifying the flora and fauna of the site including the ecology of this section of the River Tolka.
17. The proposal appears to be the thin edge of the web in an effort in time to maximise the commercial take from development on the site
18. The proposal is in conflict with the Z1, Z2 and Z12 zoning of the site.
19. The development as proposed would have a negative effect on a protected structure.
20. The proposal is premature in the pending the completion and approval of the Master Plan for the area and the Z12 zoned area
21. The Dublin City Development Plan which should form the criterion for assessing this application is explicit in asserting that for development in transitional zone areas it is important to avoid abrupt transitions in scale and use (paragraph 14.7)
22. The proposed 38 spaces for car parking for a 200 bed hotel are totally inadequate.
23. For many reasons the site of this present application is very dear to Forest Friends, including the fact that it is virtually on our doorstep.

In conclusion Forest Friends Ireland are of the opinion that for the reason cited above the Planning Authority should have requested additional information before making a considered decision on the application. The proposal should be refused for the many reasons cited above and in refusing it An Bord Pleanála would be doing a great service to the character of Clonliffe Road and its environments respect the riparian character of the site and its extensive and unique landscape in the context of Dublin City. It would also begin to insist on respect for the existing character of the area and introduce a good neighbourly development rather than the incongruous one which in effect seems to be a try on to divide the site and result in piecemeal development. The end result would probably be the creation of a concrete jungle rather than the unique landscape that the site represents. The development does not deserve the title of good neighbourliness which is a title which should be applicable in this case.

About Forest Friends Ireland is a registered charity and a company limited by guarantee with no share capital. Our offices are located within a stone's throw from the site which is the subject of the current application. We are members of the IEN environmental network which has more than 30 affiliated environmental organisations, which is recognised by the Irish Government and supported in the context of core funding which helps us greatly in realising our objectives which includes maintaining biodiversity projects established by us, reaching out to local communities and schools, working with a range of local and national NGOs. We participate in the national Parks and Wildlife Service's National Biodiversity week which normally takes place in the month of May, with the exception of this year because of the COVID restriction. We have a range of expertise to call upon and in my case I am a qualified Town Planner and Sociologist and work as a volunteer with Forest Friends Ireland and chairman of that organisation. I worked in Dublin City Council as a Town Planner for many years prior to my retirement twenty years ago.

Forest Friends Ireland's address is 40 Lower Drumcondra Road

My phone number is 0852536650 Our website is www.forestfriends.ie We also have a Facebook page:

www.facebook.com/forestfriendsireland

www.facebook.com/peaceforestireland

Forest Friends Ireland has designed, planned and is implementing a cross border peace forest, The Forest Friends Ireland PeaceForest Ireland Project. We also have an international dimension, Forest Friends International, with branches in several African and other countries. Website www.forestfriendsinternational.org

Signed John Haughton Chairman Forest Friends Ireland

14/9/2020

Note: These representations are contained in three A4 pages.