

Fingal County Council
Planning Department
County Hall
Main Street
Swords

The Square,
Donabate,
Co. Dublin
K36 Y009

3rd April 2024

Planning Reference: F24A/0169

To Whom It May Concern,

It is disappointing that given the intense discussion that took place between the Donabate Portrane Community Council and the developer on the larger Corballis East site, this new application has been submitted with no consultation with the local community.

The Community Council is opposed to further intensification of the Corballis East site and indeed the wider Donabate area without commitment for further community gains.

It appears the applicant is involved in project splitting, within the site plans 3 other potential developments can be easily identified within a very small area. A number of the sites are totally subsumed within this site and have no individual access to roads or services. This is in addition to the numerous larger sites that are next door in all directions. For this reason alone the application should be refused.

The EIAR was screened out due to project splitting and did not clearly assess the impacts on the environment due to the application.

Overall, there appears to be no amenities provided and the additional 98no. units are to rely on already insufficient community resources. There is already a lack of GP places, community spaces, shops, restaurants, crèches police etc. this application will simply make the situation in Donabate worse. A dedicated committee has been set up in Donabate to campaign for a much needed youth and cultural space, no consideration has been given to any such a space in these lands.

It is the opinion of the Donabate Portrane Community Council that this application should be refused.

The following comments also apply:

Traffic Impact Assessment

The Do Something Scenario should include all “committed developments”, if the developments are already granted it is likely they will be built before this newly proposed development is completed. Moving them to the Do Maximum scenario is playing with numbers to flatter the developments impact.

Section 4.3 concludes the proposed development will have no impact on current transport capacity in Donabate. Given the rail service is already over capacity, as evident every weekday morning, this development may be premature pending the delivery of the DART+ Coastal North project. A condition as such should be imposed on the development, if permission is granted.

Trip generation numbers in Table 7 appear overly optimistic. The report itself estimates a total of 264 residents (as per table 4), of the 264 residents the report then goes on to estimate 37 departures in the AM peak and 36 arrivals in the PM peak. This number appears overly optimistic and would represent circa 7% of the population of the proposed development.

The trip generation figures for future developments in Ballymastone & Corballis are not provided and gives no opportunity for the reader to assess these and it is not clear if they are even considered.

Traffic Impact Results

The report concludes that due to the low impact of the development on existing junctions, no further detailed analysis of the existing junctions is required. This logic is simply flawed. Anyone familiar with the existing junctions in Donabate can testify to the traffic in the village particularly in the morning and evening peaks. Given the number of developments that have now been approved including one development over 1000 units and a brand new Aldi along Turvey (that will draw traffic from this proposed development) the reports assumptions and conclusions are unacceptable, lacking and inappropriate given the scale of housing proposed. The local authority should seek further detailed analysis at junctions particularly in the village.

No assessment of the proximity of the junction to a bend on the Donabate Distributor Road was provided. Nor was any visibility splay readily available.

Site Specific Flood Risk Assessment

The SSFRA notes no risk of flooding from Fluvial, Pluvial or Groundwater flooding. The report then goes on to acknowledge flooding as recent as 2020. There is a clear lack of site investigation works and critical analysis within this report given the historic flooding and then the conclusions reached. The site is known locally as wet and marshy, a simple site walkover would have shown this. The conclusions within the SSFRA are incorrect and further information should be sought to analysis the flooding, particularly due to its proximity to a Special Area of Conservation (SAC) and Special Protection Area (SPA).

Social Infrastructure Audit Report

Schools

The report assumes a decreasing enrolment in existing school places, given the age breakdown of Donabate in addition to the number of new houses and families moving to the area, this is simply not correct and a generic county wide figure is not appropriate. The schools are already experiencing capacity issues. The report goes on to conclude given the additional growth in addition to the proposed development there will be no issues and the additional demand can easily be absorbed into the “available” capacity. The author and/or applicant is clearly not familiar with the current schools capacity issues.

Childcare

The report claims there is a childcare vacancy rate of 20.3% in Fingal, this is certainly not true in Donabate at the moment as there is somewhat of a childcare crisis with many, many families unable to get child minding for young children. This report is simply factually incorrect and seeks to put pressure on a system already bursting at the seams.

On the adjacent planning permission F22A/0527 there is a large creche envisaged. The local authority should condition that this creche is delivered and operational prior to any houses being occupied.

Healthcare & Emergency Services

The Donabate GP Medical Clinic is not taking on any new patients and is sending patients to Swords due to the extremely high demand.

This report claims such things as St. Ita’s, a national forensic mental hospital as a local resource. This is a mental hospital and unlikely to form a resource for residents.

There is no fire or police stations for the growing population.

This report is skewed in favour of the development but fails to actually address any issues. The report is critically flawed.

Conclusion

The application is deeply flawed, it undertakes elements of project splitting, over simplifies elements in favour of the development and does not acknowledge the existing flooding on the site. The application then makes claims to the abundance of social infrastructure within Donabate, which is again not true.

The applicant has not made any attempts to meet or discuss the applications with the local community.

For these reasons, the application should be refused.

A handwritten signature in black ink, reading 'Laura McGivney', is written over a horizontal line.

Laura McGivney

Chairperson, Donabate Portrane Community Council