

Fingal County Council
Planning Department
County Hall
Main Street
Swords

The Square,
Donabate,
Co. Dublin
K36 Y009

09th January 2025

Planning Reference: F24A/1061E

To Whom It May Concern,

It is disappointing that the developer has made no effort to reach out to the local community and in particular the Donabate Portrane Community Council (DPCC). DPCC has engaged with other developers nearby to ensure sustainable development occurs and best practice is followed. This application provides for 96 no. residential development with no gains to the existing Donabate & Portrane communities. Fingal County Council must seek to deliver both housing with associated infrastructure and DPCC will continue to challenge in the courts, if necessary, the over intensification of housing without the associated infrastructure.

The EIAR was screened out, however, given its proximity to a number of small streams and its proximity to the Broadmeadow estuary, this appears to be incorrect.

Overall, there appears to be no amenities provided and the additional 96no. 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:

Planning Report

The site proposes 41 units per hectare. The LAP states a maximum density of 35 units per ha.

Traffic Impact Assessment

Section 8.2 of the Traffic and Transport Assessment claim in the year 2043, the proposed development has less than 10% impact on 5 of 6 junctions analysed and therefore does not require further analysis. Due to project splitting, and the developer lodging less than 100 units at a time across multiple applications, this may be true, it does not however reduce the impact on the village centre of Donabate. The developer should at a minimum be requested to submit a traffic impact assessment that analysis the impact of the proposed development, in detailed, on the village centre through traffic modelling. This report simply does not go and properly analysis if any of the junctions have spare capacity and has skirted around the issues.

Section 5.2 Trip Generation fails to consider the following town centre sites that are granted planning but not yet constructed. The below sites are both large trip generators and trip distribution points.

SHD/019/19 – 144 units including retail

F15A/0181 – mixed use retail (1,217 sq.m. net floor area)

F21A/0708 – Retail development (1,320 sq.m floor area)

The above clearly indicate the Traffic and Transport assessment is below an acceptable threshold.

Road Safety Audit

No consideration has been given to the proposed introduction of a new uncontrolled junction on to the Donabate Distributor Road. Given the existing speeds on the Donabate Distributor Road along with the estimated future traffic volumes, this has the potential to be very unsafe.

This goes against modern best practice. The developer should be asked to resubmit the plans removing this.

Site Specific Flood Risk Assessment

The SSFRA acknowledges flooding on the site and acknowledges the site is within Flood Zone A and Flood Zone B. The proposed solution to flooding on the site is to simply build up the site. This is direct contradiction to the 2009 OPW guidance "*The Planning System and Flood Risk Management*" that the local authority are to comply with. The development should have no impact on the local flooding environment and simply sending the flood water elsewhere by use of levels is in contradiction to these guidelines. The correct solution would have been compensatory storage.

Social Infrastructure Audit Report

Schools

The report (refer to section 4.1.3.2) 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 concludes 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.

This report is playing with numbers and using the statistics that suit the development, the report in section 4.2.2 (also in the traffic impact assessment) was able to calculate additional units from the proposed developments, this metric would have been more useful to calculate additional school place demand rather than assuming incorrectly there is space in schools and that magically the demand will decrease despite the over development of the area.

Childcare

Section 4.2.3 acknowledges that there is no spare childcare places available within Donabate.

The report then in section 4.2.7 goes on to rely on other planned developments (that may not go ahead). Each development should be self-sustaining, if there are not enough creche spaces then this development should be conditioned to provide one to serve the needs of its residents. It is simply not acceptable to fill the site with houses and hope the problem goes away.

Social, Community and Culture Facilities

With the exception of sports facilities, Donabate & Portrane are poorly provided for in terms of community facilities. The group DP Crossroads has undertaken recent good work to highlight the deficiency in social and cultural facilities in the area. The Donabate Portrane Community Centre is oversubscribed already with the existing population, as is the parish hall. None of the new proposed developments aim to provide any additional community space.

This development should be conditioned to provide additional community space.

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 and oversimplifies elements in favour of the development and does not acknowledge the existing deficiencies in services in Donabate and the over subscription of housing. 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.

Laura McGivney

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Chairperson, Donabate Portrane Community Council