

The Secretary,
An Bord Pleanála
64 Marlborough Street,
Dublin 1,
D01 V902

The Square,
Donabate,
Co. Dublin
K36 Y009

24th September 2024

Planning Reference: LRD0039/S3

To Whom It May Concern,

It is disappointing that the developer has chosen not to engage in any way with the community before lodging an additional planning application for housing in Donabate. The Community Council is opposed to further housing developments in Donabate without commitment for further community gains. The community council objects to the proposed development on the following grounds:

1. Residential Density

The density of the proposed development of 44.7 units per ha is above the allowable within the Donabate Local Area Plan of 35 units per ha.

The Fingal Development Plan 2023-2029 notes that residential density should be in line with Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009. These standards allow for a density of 30-40 units per ha.

Furthermore, the applicant within the Architectural Design Statement justifies the high density on the proximity to the train station. The Public Transport Capacity Assessment located with Appendix E of the Traffic and Transportation Assessment fails to assess the current capacity constraints on the commuter services. The author is confused as to the provision of existing DART, for clarity, the DART does not serve Donabate. The applicant acknowledges that there will be an increase of 5% in the morning and evening peaks but due to the inadequate assessment of the existing train services on which they rely, they do not realise the service is already oversubscribed. They also appear to rely heavily on DART+ Coastal North, which does not have planning permission and may be 10 years away. The planning application appears to have failed to justify its high density which is in opposition to the standards.

It is the opinion of the Donabate Portrane Community Council that the density of the development is in excess of the standards and too reliant on existing inadequate public transport and the proposed development should therefore, be refused.

2. Creche & Schools

No creche is provided for within this phase of the development and the planning report in section 5.1.9 and the Childcare and Schools Demand Assessment report in section 6.4 refers to phase 1 and phase 3 as meeting the demand for childcare in phase 2. This is simply not acceptable as an application cannot rely on other separate applications or future promises that may not be delivered. Donabate is experiencing a childcare crisis where parents are unable to find spaces for babies particularly places for children under the age of 2. Furthermore, relying on a future phase that may never happen is bad planning and does not meet the needs of the houses as part of this application.

The Schools Demand Assessment report calculates the demand for creche places and school places based on national averages from the 2022 census. Donabate has an extremely young population and using national averages is not an appropriate measure and only gives rise to skewed favourable data for the developer. Given that both small area and town breakdown information is readily available on the CSO website it can be assumed that the author chose not to use a local average and chose a more favourable number.

The developer should use local data either gathered from local creches/schools or from the CSO as the basis for their assessment.

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. The report is simply using logic that does not add up and the whole report needs to be reconsidered.

An additional creche should be constructed as part of this development and it should not rely on the existing shortage or any future phases of the scheme. The development should not be granted without an additional creche to serve the site.

The development should not be occupied prior to the completion of the new schools planned for the area. Conditions should be placed on the site that they may not be occupied until additional schools are provided in the local area.

3. Lack of Commercial & Retail Space

No commercial, retail or any additional infrastructure is provided within the development. The additional 364no. units are to rely on already insufficient community resources. There is already a lack of GP places, community spaces, shops, restaurants, police station 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.

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

It is the opinion of the Donabate Portrane Community Council that this application should be refused due to lack of commercial and retail space provided.

4. Traffic Impact Assessment

The application seems to ignore an additional development F24A/0169 that consists of another 98 no. residential units in very close proximity to the Ballymastone development that is subject to this application. The applicant at a minimum in a request for further information should be requested to include the impact of this development on their analysis.

The analysis does not consider the impact of this development on the junction of the Hearse Road and Distributor Road. Given this will soon be the busiest junction in Donabate and will be utilised by all residents of this development leaving the peninsula it appears a rather large omission. The applicant at a minimum in a request for further information should be requested to include the impact of this development on their analysis.

Trip rates have been amended to more favourable rates from the approved Phase 1 to Phase 2 due to different parking standards. The author appears to believe neighbours, potentially only living meters apart, will utilise their cars less because the Fingal Development Plan changed between 2022 and 2023. The author should have retained the trip generation figures from phase 1 as a “worst case scenario” and ensured that the development was not negatively impacting the development instead of massaging trip generation figures to suit the development. The applicant at a minimum in a request for further information should be requested to retain the phase 1 trip generation figures to assess the impact of this development on their analysis.

The development appears to rely heavily on future transport projects such as DART+ Coastal North. The AM & PM peak trains are already over capacity every day. The development should therefore be conditioned that it can not be occupied until such a time as these associated pieces of infrastructure are delivered to avoid making congestion on the transport network even worse.

5. Conclusion

The application is deeply flawed, and it oversimplifies elements in favour of the development. The application then makes claims to the abundance of social infrastructure within Donabate, which is again not true. The addition of houses with no associated infrastructure is making life for the existing residents of Donabate unliveable and needs to be considered by both applicants and the local authorities.

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

For these reasons, we believe An Bord Pleanála should reverse the decision of Fingal County Council to approve this development, which is in direct contravention to their local area plan.

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

Donabate Portrane Community Council

Laura McGivney

Chairperson DPCC

