

Fingal County Council
Planning Department
County Hall
Main Street
Swords

The Square,
Donabate,
Co. Dublin
K36 Y009

11th September 2025

Planning Reference: F25A/0730E

To Whom It May Concern,

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

Firstly, the Community Council would like to highlight the lack of communication between the developer and the Donabate Portrane Educate Together primary school. The proposed development backs on to the school site and the developer has made no communication or enquiry to the school as to the application or impact on the school site. The school board foresees the need for future expansion of the school buildings, and this would correlate with the recent new residential developments under construction in the Donabate Portrane area and the growing population. The land in question is the only appropriately zoned and viability located lands that may satisfy the expansion needs of the school. It is extremely disappointing that the developer or their agents chose not to engage with the local community on this matter.

In addition to the above, the following comments are, in the opinion of the Donabate Portrane Community Council, why the application should be refused:

Land ownership

The landownership of the area is unclear; the folio is split down the middle of the subject site and are not linked. This planning application would limit required expansion of the Educate Together school. I note the developer has not provided any support from the board of the school on this matter.

Land Zoning

The subject residential development is partially located on lands zoned “**Community Infrastructure**” in the Fingal Development Plan 2023-2029 where the objective is to “provide for and protect civic, religious, community, education, health care and social infrastructure”. Residential development is **not** permitted within this land use. The development as proposed would therefore, contravene materially a development objective indicated in the Development Plan for the zoning of land for the use solely or primarily of particular areas for particular purposes and would be contrary to the proper planning and sustainable development of the Donabate area.

The above is further emphasised through Policy CSP32 – Donabate LAP where the council is to “Support the provision of the necessary social and community infrastructure including recreational

facilities and strengthen and enhance the public realm, providing improved levels of connectivity and permeability”.

Donabate is expanding rapidly with hundreds of housing units currently under construction, with soon to be thousands of additional residents, with the required community infrastructure is sorely lacking. It would be contrary to the Development Plan zoning, development policy and the local Donabate Local Area Plan to grant this permission.

In 2017, a similar development was also refused planning permission on this site for similar zoning issues under planning reference F17A/0589. This has set a clear precedent on the site.

Roads & Footpaths Layout

There appears to be some confusion on the roads and footpaths layouts. If you refer to the “Landscape Masterplan” drawing number PP470-01 there are a number of issues:

1. Not one crossing point is show on roads despite the developer trying to sell the houses for vulnerable road users (visually impaired)
2. Footpaths do not align, the footpath outside units 25-28 does not align with the footpath outside units 14-17. No crossing point would be possible for vulnerable road users.
3. The “shared surface” material is unclear and not defined in the legend, it is also unclear why the end of the cul de sac would not also be a shared surface to give priority to vulnerable road users.

Car Parking

Parking spaces provided are in excess of the development standard. The majority of units are 1-bedroom units to be provided at 0.5 car parking spaces per unit for Zone 1 developments (as the development is within 1600m of the rail station. The development subsequently provided 1 car parking space per unit. Therefore, the number of car parking spaces within the development should be reduced.

Road Safety Audit/Quality Audit

The developer is attempting to sell the units for vulnerable road users, specifically visually impaired residents, no road safety audit is provided for the development and as a result issues as highlighted already in this report are obvious and inappropriate for the type of residents suggested. At a minimum a road safety audit should be conditioned on the developer prior to any works taking place.

Drainage Plan

The engineering plan has several mistakes including S43 that is at level 6.153m? which is 1.4m above the house it is outside.

Significant details are missing from the “vegetated pond” that is presumably the attenuation pond. No I.L. invert level is provided on the pond, the “Drainage Report” states “Calculations are shown in annex B”, however on inspection of Appendix B, this Appendix is missing, and no details can be verified.

Lack of Appropriate Assessment (AA) Screening

Given the location of Donabate in proximity to the Rogerstown SAC, an AA screening assessment should have been produced to screen in/out any possibility of a significant effect on a European site, either alone or in combination with other plans or projects.

Construction Management Plan/Construction Environmental Management Plan

No details are provided in the planning application as to how construction vehicles, materials and workers will access the development. Given that the construction works and traffic will have to access the site via the existing Paddocks estate, the developer should have seen fit to submit either a Construction Management Plan or Construction Environmental Management Plan to ensure no adverse impacts to the residents or local environment during construction works.

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

Shane McGivney

Planning Officer, Donabate Portrane Community Council