

Fingal County Council  
Planning Department  
County Hall  
Main Street  
Swords

The Square,  
Donabate,  
Co. Dublin  
K36 Y009

06<sup>th</sup> November 2025

**Planning Reference: LRD0053/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. Community & Social Infrastructure**

The proposed development provides no community or social gain for the local area. The “Community and Social Infrastructure Report” simply lists existing services that over a thousand extra residence, from this one phase, of this one development, are supposed to use. Fingal County Council and the developers are failing the existing residents of Donabate. With several thousand extra residents expected in Donabate/Portrane over the next few months/years there is no extra shops, doctors or any facilities being provided.

The “Community and Social Infrastructure Report” does not list the capacity of any existing service and is unaware such services as doctors are not taking new patients due to the influx of new residents to the area. The report seems to confuse parks and simple green space in estates and then claims existing green spaces in the existing Links estate is a park for use by the developer.

The “Schools Demand & Childcare Facilities Assessment” fails to address the shortage of school places in the Donabate area. With almost half of all children of secondary school age leaving the area daily for school, this development will make the situation worse. The developer has suggest schools in Rush and Lusk for use, this is unacceptable and points to the developer knowing the shortage of school places but ignoring the issue, while somehow concluding at the end without stating the schools are at full capacity, concluding they have room for hundreds of additional students.

**2. Lack of Commercial & Retail Space**

No commercial, retail or any additional infrastructure is provided within the development. The additional 398no. 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.

### **3. Traffic & Car Parking**

There are 288 no car parking spaces proposed at the development. This is an average rate of 0.72 car parking spaces per unit. The developer has proposed not to provide one bedroom apartments with parking. Where are the additional cars supposed to park, the developer has not considered how estates such as the links may be indirectly impacted.

The "Transportation Assessment" trip generation figures are laughably low. The report suggests an AM peak out of 0.32 for houses and 0.18 for apartments averaging at 0.25 trips per residential unit out in the AM Peak. This is ridiculous in an area that is well over a kilometre from the train station that only 1 in 4 residential units will produce 1 single vehicle.

The "Transportation Assessment" fails to consider developments already under construction such as SHD/019/19/ (amended by LRD0023/S3), F21A/0708, F20A/0630. These developments include hundreds of apartments and large supermarkets. These developments are months under construction and can only have been missed by someone who has never been to Donabate. This omission has the potential to misrepresent the traffic impact of the proposed development particularly for the trip attractor such as the supermarket.

Given the above points, it is clear the author is attempting to underrepresent traffic and the impact of this development. This is particularly evident in the analysis; the Do-Nothing scenarios have no junction at capacity (at or above 100%) until 2028 or 2033 depending on the junction. This again proves the author has never visited Donabate. Any morning the author and Fingal are welcome to view the junction of the Hearse Road and Turvey (junction 5 here), where a queue of 20-30 vehicles can be seen (again this is before the omitted developments are completed construction).

The Do Something analysis is flawed based on the above points and has the exact same issues with underrepresenting the traffic impact.

In summary, the traffic impact illustrated here is wildly misrepresented and Fingal should seek that this report is redone and vastly improved to verify the correct traffic and therefore environmental impact on the existing environment.

#### **4. 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 impact of traffic has been shown to be underrepresented and therefore shows the EIAR has not adequately assessed the environmental impact on the receiving environment.

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 that reads 'Shane McGivney'.

**Shane McGivney**

**Planning Officer, Donabate Portrane Community Council**