



## Observer's details

### 1. Observer's details (person making the observation)

If you are making the observation, write your full name and address.

If you are an agent completing the observation for someone else, write the observer's details:

(a) Observer's  
name

Donabate Portrane Community Council – c/o David  
Fletcher

(b) Observer's  
postal address

142 The Links, Donabate, County Dublin

## Agent's details

### 2. Agent's details (if applicable)

If you are an agent and are acting for someone else **on this observation**, please **also** write your details below.

If you are not using an agent, please write "Not applicable" below.

(a) Agent's name

Click or tap here to enter text.

(b) Agent's postal  
address

Click or tap here to enter text.

## Postal address for letters

3. During the process to decide the application, we will post information and items to you **or** to your agent. For this **current application**, who should we write to? (Please tick ✓ one box only)

**You (the observer) at the postal address in Part 1**

**The agent at the postal address in Part 2**

## Details about the proposed development

4. Please provide details about the **current application** you wish to make an observation on.

- (a) **An Bord Pleanála case number for the current application (if available)**  
(for example: 300000)

313192

- (b) **Name or description of proposed development**

Ballymastone SHD Planning Development -

[www.ballymastoneshdplanning.com](http://www.ballymastoneshdplanning.com)

- (c) **Location of proposed development**

(for example: 1 Main Street, Baile Fearainn, Co Abhaile)

*Lands at Ballymastone (north-west of the intersection of New Road and the Donabate Distributor Road), Donabate, Co. Dublin*

## Observation details

### 5. Grounds

Please describe the grounds of your observation (planning reasons and arguments). You can expand to fit what you write. You can also insert photographs or images in this box. (See part 6 – Supporting materials for more information.)

*Re: 313192: Lands at Ballymastone (north-west of the intersection of New Road and the Donabate Distributor Road), Donabate, Co. Dublin.*  
[www.ballymastoneshdplanning.com](http://www.ballymastoneshdplanning.com)  
154 no. apartments, creche and associated site works.

Dear Sir/Madam,  
Donabate Portrane Community Council are making the following observation to An Bord Pleanála for the proposed Ballymastone Strategic Housing Development, case reference Tao6F.313192

#### Introduction:

This development materially contravenes the Donabate Local Area Plans and the Fingal Development Plans throughout the application. The applicant provides a Material Contravention Statement and confidently believes that this will absolve them for their sins. I would like to remind the Board at this stage why we have strict planning regulations. These regulations are there to protect citizens and communities and not there to be influenced or manipulated by financiers or developers. We are building more than units. We are building homes, sustainable communities, and our overall goal is to offer people a better quality of life. This application fails dismally. It is sickening to see the applicant using any measures available to maximise their return. It is likely that this development is targeting the rental market to be procured by cuckoo funds. These units will do nothing to address the housing crisis as they will not be available to first time buyers or people wishing to downsize for example. I would like to remind the Board that planning permission (F20A/0510) has already been awarded on this site for 72 units. A more sustainable rural urban development density.

The impact this development has on the communities of Donabate and Portrane has not been considered from an unbiased perspective regarding traffic management, social & community services, and infrastructure requirements. As brought before the Board on previous applications for this site and other recent planning applications in the area, bringing your attention to the Corballis East SHD - <https://corballiseastshd.ie>, the impact of collective developments on the peninsula has not been considered and no long term operational and sustainable perspective is considered. This approach has dire consequences on the community at large. Presently, the community is suffering from chronic deficits in infrastructure regarding public transport, electricity and safe movement of pedestrians and cyclists. With over intensification of this development, it will set precedence for all other developments to amend their planning permissions/applications to seek increased density. This approach will deteriorate the ongoing crisis on the peninsula and bring the peninsula to a standstill and make for uncomfortable living for existing and future residents. Of course, this can all be avoided when regional development is approached in a sustainable way.

## 5. Grounds

This application should be refused for the following reasons:

- 1) The architectural design for a prominent site entering Donabate from the Donabate Distributor Road is of the poorest quality and does nothing to protect and preserve the character of Donabate and the surrounds.
- 2) An independent traffic and transport report was submitted by Donabate Portrane Community Council with their submission of the Corballis East SHD and strongly argues statements in the Public Transport Capacity Assessment and Traffic & Transport Assessment reports with this application. Please refer to this planning report - <http://documents.fingalcoco.ie/NorthgatePublicDocs/00713499.pdf>. I ask the Board to consider this report.
- 3) At 85.08 units per hectare, which is 2.4 times the recommended density. If permitted this will set a precedence for all other awarded, ongoing, and future planning applications. This is simply wrong, and I plead with the Board not to permit this application.
- 4) *Objective DMS57: Require a minimum public open space provision of 2.5 hectares per 1,000 population. For the purposes of this calculation, public open space requirements are to be based on residential units with an agreed occupancy rate of persons in the case of dwellings* (<https://static1.squarespace.com/static/61e6f041b958d5243770facb/t/6246e4952539>)  
Admitting not satisfying Objective DMS57 does not address the shortfall. Neither does cash in lieu to Fingal County Council. Planning authorities are supposed to be protecting and enhancing quality of life. If planning authorities keep accepting cash in lieu payments for shortfalls in public open space, effectively they have skin in the game. I ask the Board, is this right? This money, as our community have experienced in recent times, is not being used to enhance local parks or amenities or provide new parks. It is distributed elsewhere in the county. This is a shocking practice when you consider the current situation with our poor accessibility and lack of an integrated pedestrian/cycle network to the train station, village, beaches and local sports clubs. Furthermore, Covid 19 has highlighted to the world the importance of public open space. Protect this space, don't sell it to the highest bidder.
- 5) Apartment Block C is a material contravention of Objective DMS23 the Development Plan.
- 6) Apartment blocks are not serviced by lifts and thus, does not cater for the requirements or needs of young families, the elderly population or a population with reduced mobility.
- 7) It is not in the best public interest or is it of strategic or national importance to provide dwellings that do not meet the functional requirements of the population. A place exists for apartments both in the private and rental market, but not at this scale and people who wish to upsize/downsize. This type of development is suited for cities and large urban areas, for a younger demographic, not in a village 25 km north of Dublin city centre where public transport and road infrastructure is not fit for purpose and no longer sustainable.
- 8) As mentioned, this is a prominent site entering Donabate and is the gateway to our village and beautiful beaches. As required in all urban framework plans, a stepped approach from the street is recommended under urban design guidelines and also emphasise the importance of interesting and different roof lines. What we are

## 5. Grounds

getting is a flat roof, of poor architectural design.

- 9) The dominant height in Donabate is 2 stories, with new developments rising to 2.5 stories. 2.5 stories is the design preference in the Donabate Local Area Plan, rising to 4 stories for apartment blocks. For all apartment blocks delivered in recent times, the permitted height is 4 levels. This proposal is a 50% increase and will scar the landscape forever. I would like to bring to the attention of the Board, that 70% of all new units in Donabate in recent times are apartments. Continuing this trend removes choice of dwelling from the population. This surely is not right.
- 10) Further to planning ref F20A/0510, as mentioned above, the developer has already secured planning permission on this site for circa 72 houses units of mixed type. These numbers are far more congruous with sustainable living and development, and without overloading already saturated infrastructure. That the developer has come back to the board in this manner and used the SHD process to submit the instant application which is unacceptable, excessive and disproportionate for all of the reasons hereinbefore given, it amounts to no more than a second and somewhat cynical "free roll" of the planning dice.

For all the above reasons, I ask the Board to refuse out right this application.

Kind regards,

David Fletcher  
Chair of, and on behalf of Donabate Portrane Community Council  
142 The Links,  
Donabate.

## Supporting materials

6. If you wish, you can include supporting materials with your observation.

Supporting materials include:

- photographs,
- plans,
- surveys,
- drawings,
- digital videos or DVDs,
- technical guidance, or
- other supporting materials.

If your supporting materials are physical objects, **you must send** them together with your observation by post or deliver it in person to our office. You cannot use the online uploader facility.

**Remember:** You can insert photographs and similar items in part 5 of this form – Observation details

## Fee

7. You **must** make sure that the correct fee is included with your observation.

**Observers (except prescribed bodies)**

- strategic housing observation **only** is €20.
- strategic housing observation **and** oral hearing request is €70

## Oral hearing request

8. If you wish to [request the Board to hold an oral hearing](#), please tick the “Yes, I wish to request an oral hearing” box below.

Please note you will have to pay the correct **additional non-refundable fee** to request an oral hearing. You can find information on how to make this request on [our website](#) or by contacting us.

If you do not wish to request an oral hearing, please tick the “No, I do not wish to request an oral hearing” box.

**Yes, I wish to request an oral hearing**

**No, I do not wish to request an oral hearing**

## Final steps before you send us your observation

9. If you are sending us your observation using the online uploader facility, remember to save this document as a Microsoft Word document or a PDF and title it with:

- the case number and your name, or
- the name and location of the development and your name.

If you are sending your observation to us by post or delivering in person, remember to print off all the pages of this document and send it to us.

The National Adult Literacy Agency (NALA) has awarded this document its Plain English Mark. Last updated: November 2020



**For Office Use Only**

<b>FEM – Received</b>		<b>SHU – Processed</b>	
Initials		Initials	
Date		Date	

**Notes**