

LARGE-SCALE RESIDENTIAL DEVELOPMENT
PLANNING APPLICATION
RESPONSE TO THIRD PARTY APPEALS
TO AN BORD PLEANALA

LANDS AT BALLYMASTONE, DONABATE,
CO.DUBLIN- PHASE 2
REF: ABP-320885-24/LRD0039/S3

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**Brady Shipman
Martin**
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CLIENT
Glenveagh Living Limited

DATE
21 October 2024

BALLYMASTONE LRD 2

Response to Third Party Appeals

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Brady Shipman Martin

DUBLIN

Mount Pleasant Business Centre
Ranelagh
Dublin 6
+353 1 208 1900

CORK

Penrose Wharf Business Centre
Penrose Wharf
Cork
+353 21 242 5620

LIMERICK

11 The Crescent
Limerick
+353 61 315 127

mail@bradyshipmanmartin.com

www.bradysipmanmartin.com

TABLE OF CONTENTS

1	INTRODUCTION	5
2	OVERVIEW OF PLANNING CONTEXT & DECISION.....	5
3	RESPONSE TO THIRD PARTY APPEALS.....	7
3.1	Appeal by The Links Association (prepared by O'Neill Town Planning)	8
3.2	Appeal by DP Crossroads Committee	12
3.3	Appeal by Donabate Portrane Community Council.....	19
4	CONCLUSION	24

APPENDIX 1- DBFL Response to Appeals on Traffic & Transportation

1 INTRODUCTION

Brady Shipman Martin has prepared this Response to third party appeals on the decision of Fingal County Council to grant permission for a Large-scale Residential Development (LRD) development at Lands at Ballymastone, Donabate, Co. Dublin (Ref: FCC LRD0039/S3).

2 OVERVIEW OF PLANNING CONTEXT & DECISION

The application site (hereafter called 'the site') is to the east of Donabate Village, Co Dublin and forms Phase 2 of a wider masterplan for Ballisk, Ballymastone, Ballalease North & Portrane Demesne Townlands. The site has a total area of 15.02 ha of a total masterplan land area of c. 32ha.

The application was made by Glenveagh Living Limited on the basis of a Development Agreement with Fingal County Council, as the landowner, to develop the lands. Glenveagh Living Limited's proposed scheme complies with the requirements as specified by Fingal County Council as part of this procurement process for developing a sustainable mixed tenure residential development, while according with proper planning and sustainable development principles.

The site is identified as Ballymastone in the Donabate Local Area Plan 2016 – 2022 ('the LAP') which was adopted in March 2016 by Fingal County Council. In March 2021, the Council Members approved the extension of the life of the LAP for a further period of five years to March 2026. It sets out a detailed strategy for the development of the landbanks zoned for residential development in the Donabate area under the Fingal County Development Plan 2023-2029, and under the previous 2017-2023 Development Plan.

This LRD Application falls under the definition of Large-Scale Residential Development (LRD) as set out under Section 2 of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 as it is 'the development of 100 or more houses'.

The lands, subject of the permitted LRD application, are zoned RA 'new residential'. As such the use of these lands primarily for residential purposes is provided for in the Core Strategy of the Fingal Development Plan 2023-2029.

The subject lands are primarily undeveloped in nature. The site is bounded by existing residential development of The Links to the west, the wider undeveloped Ballymastone lands and The Priory to the north, permitted

BALLYMASTONE LRD 2

Response to Third Party Appeals

Ballymastone Phase 1 residential development to the south (ABP Ref. 315288-22 / LRD 0008/S3) and the Donabate Distributor Road to the east.

The LRD Application was lodged to Fingal County Council on the 30TH April 2024 and a decision to grant permission was made on the 28th August 2024 subject to 33 conditions.

3 RESPONSE TO THIRD PARTY APPEALS

A total of three no. third party appeals were received by An Bord Pleanála as issued to us. These are:

1. The Links Residents Association (prepared by O'Neill Town Planning c/o Darren Laird)
2. Donabate Portrane Community Council (Laura McGivney, Chairperson)
3. DP Crossroads Committee (Ann Hogan, Chair)

The appeals raise a range of similar issues and concerns relating to the proposed development in respect of:

1. Density
2. Material Contravention of LAP re: Phased Development
3. Material Contravention of Core Strategy
4. Population
5. Community, Social Infrastructure, Childcare & Schools
6. Public Transport Capacity & Provision
7. Traffic Impact Assessment & related issues incl. junction assessments
8. The Links Road, use, modal filter.

We acknowledge the concerns of the local community in relation to the proposal for development of these residentially zoned lands. However it is submitted that the lands have been the subject of extensive planning guidance in relation to the Fingal Development Plan the Donabate Local Area Plan and the Ballymastone Framework Plan, and that these issues have been considered in the application, during the pre-planning process with Fingal, and are further considered and reviewed in this response to appeals.

In addition, where any non-compliance or diversion from a Development Plan or Local Area Plan policy is stated by the appellants it is automatically determined that it is a material contravention. It must be stated clearly that not all perceived diversions are contraventions, and particularly not automatically material contraventions. The role of the planning authority and An Bord Pleanála is to take a balanced approach to what are generally competing policies and objectives from national to local planning policy and thereafter to make a professional considered decision.

This Response to Third Party Appeals addresses each Appeal separately, and as much as possible, in the order in which the issues are raised in the individual Appeals. Some items are amalgamated to comprehensively address the issues raised.

3.1 Appeal by The Links Association (prepared by O'Neill Town Planning)

3.1.1 Traffic & Residential Amenity

The Appeal sets out that The Links Association are not opposed to development in the area, however consider '*intensification of traffic*' would result in increased traffic hazard, and impact on residential amenity.

Please see DBFL Report at Appendix 1 for a comprehensive response to items raised in relation to the Link Road, traffic, transport, roads, and public transport.

3.1.2 Planning Parameters & Consideration of Development Plan Policies and Objectives

The Appeal sets out a number of policies and objectives which it considers that Fingal County Council (FCC) did not adequately consider in the determination of this decision to grant permission.

The listed policies and objectives centre on:

- (a) Pedestrian & cycling networks, and promotion of sustainable travel
- (b) Community & Social Infrastructure

Issues and concerns raised are further set out below in summary form:

- (a) Provision of the Link Road / Traffic generation & Trip Rates / Public Transport provision / Contravention of NPF / Climate Action Plan / provision of pedestrian and cycle access / use of Bollards
- (b) Community & social infrastructure Report (provision of the Community Centre as per LAP)
- (c) Creche Delivery
- (d) Construction Management Plan

(a) Provision of the Link Road / Traffic generation & Trip Rates / Public Transport Provision / Contravention of NPF / Climate action plan

Please see DBFL Report at Appendix 1 for a comprehensive response to items raised in relation to the Link Road, traffic, transport, roads, and public transport.

In addition to DBFL full consideration of transport issues raised, attached in Appendix 1, we wish to state that GVB understand the concerns raised in relation to the Links Road, and proposed modal filter, and propose to the Board that the modal filter be provided and maintained by removing Condition 19(f) of the FCC decision in any final grant of planning permission. This maintains permeability and prevents this from becoming a through route (rat-run) for external traffic as per third party request.

Alternatively, Glenveagh is happy to work with Fingal County Council under the existing condition and retain it in place as per the wishes of local residents.

(b) Community & social infrastructure Report (provision of the Community Centre as per LAP)

The Social Infrastructure Report submitted with the application documentation, submits that there are established and yet to be delivered community facilities which will meet the demand created by the future residents of the proposed development.

From the assessment of existing and permitted facilities, it is submitted that the proposed development will contribute to the achievement of community objectives and will enable the future vitality of the area.

In delivering residential development at Ballymastone, including in this proposed Phase 2 of development, GVH is aligned with the intent and objectives of the Donabate Local Area Plan, the Ballymastone Framework Plan, and the Fingal Development Plan in the delivery of housing in this area.

The permitted Fingal County Council Recreational Hub (Reg. Ref. Part XI/004/21) at Ballymastone to the east of the Donabate Distributor Road, will be delivered to meet the growing population requirements of Donabate. It is planned to include for amenity and leisure including athletics track, all weather and grass pitches, skatepark, and playground, *inter alia*, on an extensive land bank zoned CI Community Infrastructure. This permitted community infrastructure is progressing for delivery in 2026, which will therefore be in place prior to delivery of this proposed residential project, which has a stated estimated construction period of 2.5 years.

We understand from FCC that the following timelines are anticipated for this project delivery:

- To date the following works have been completed: Ground Investigation works, Preliminary site investigations, Engagement with ESB & Uisce Eireann.
- An Integrated Design Team is being appointed in October 2024 to prepare the technical specifications on all aspects of the project and to prepare the tender package.
- In November 2024 the undergrounding of existing overhead cables is planned.
- The Detailed Design Stage is commencing in October and projected to complete in December 2024.
- The tender is expected to issue in January 2025 with contract award anticipated in March 2025.
- Construction is projected over 18 months (March 2025 – September 2026).

(c) Creche Delivery

The Appeal is concerned that the permitted childcare facility in Phase 1 will not be delivered prior to Phase 2 being occupied. GVH has committed to the early delivery of a creche in Phase 1 of the Ballymastone lands to ensure early delivery of childcare facilities that meets both Phase 1 and Phase 2 projected requirements. It is noted that the Phase 1 creche construction is progressing well and is at first floor level presently, with programmed substantial completion of works by Q2 2025. A further creche is proposed under the GVH agreed masterplan to be delivered in Phase 3 of the lands to provide for the proposed development.

Under Ballymastone Phase 1 (FCC Ref. LRD0008/S3 & ABP Ref. 315288), a creche of c.909 sq.m with an external play space of c.430 sq.m is permitted and has capacity to accommodate c. 182 no. childcare spaces. Under this permitted development, it is estimated that a demand for c.101 no. childcare spaces will be generated. This childcare facility will therefore meet the demand of c.101 no. childcare spaces generated by the permitted development and the additional 83 no. places will serve future residential development of the Ballymastone lands (in tandem with a future creche to be delivered in Phase 3 lands, to meet the demand generated by that phase of development). In accordance with the Childcare Guidelines 2001, the proposed development generates an estimated demand of 81 – 83 no. childcare spaces.

It has been submitted that the early provision of childcare services in initial phases of development at Ballymastone will be in place to serve these Phase 2 lands. This is further set out in the *Schools Demand & Childcare Facilities Assessment* prepared by Brady Shipman Martin which is submitted as part of the Phase 2 LRD application documentation.

(d) Construction Management Plan

Appropriate working hours are essential to the timely delivery of housing and we request that those set for Phase 2 be maintained as per Phase 1 at 07:00 to 19:00 Monday to Friday inclusive and 08:00 to 14:00 on Saturdays.

We note Condition 31 of the FCC Notification of Decision seeks to limit the start time to 8am, but we submit that this would have an unacceptable and disproportionate impact on construction work and the pace of delivery of critical housing supply on this site.

The CEMP to be provided in accordance with Condition 7 includes a requirement to set specific noise thresholds and monitoring of noise levels during construction stage. These will be set in accordance with best practice guidance as set out in the application EIAR. Similarly, Condition 31 requires a Noise and Vibration Management Plan for the construction phase which is required to identify all likely sensitive-receptors (i.e. existing residences) and deploy appropriate specific mitigation measures. It will also make provision for engagement with local residents and business owners.

With these measures and ongoing monitoring in place, the predicted impacts are expected to be low, including with a 07:00 start time.

Conclusion

GVH application for delivery of housing in Ballymastone, in partnership with Fingal County Council, is fully aligned with relevant statutory policies and plans including NPF objectives, RSES, Fingal County Development Plan, Donabate Local Area Plan, and Ballymastone Framework Plan. Climate Action Plan is also fully complied with in relation to emphasis on sustainable transport modes and active travel, in addition to optimisation of public transport infrastructure investment. Ensuring connectivity through the lands for cycle and pedestrian linkages as far as possible integrating with Donabate Town Centre and existing residential areas.

3.2 Appeal by DP Crossroads Committee

The Appeal asserts a number of areas for consideration by An Bord Pleanála and sets out Grounds for Appeal. The Response below addresses these Grounds for Appeal.

The Appeal introduces by stating that the cumulative impact of applications and permissions in recent years in Donabate, and resulting undue pressure on community facilities and infrastructure, has not been addressed in consideration of this application. It is set out further below, that this proposed development is fully aligned with The Fingal Development Plan, Donabate Local Area Plan, and Ballymastone Framework Plan, and seeks to deliver residential development which complements the wider delivery of community infrastructure planned and permitted.

As set out previously in this Response to Third Party Appeals (on page 9), this application for development complements existing permitted development for the Local Authority Recreational Hub on lands adjacent to this proposed residential development, on an extensive land bank zoned CI Community Infrastructure, designed to respond to the growth in population as set out under the LAP and Fingal Development Plan. This permitted community infrastructure is progressing for delivery in 2026, which will therefore be in place prior to completion of this proposed residential project, which has a stated estimated construction period of 2.5 years.

The Fingal Development Plan, Donabate Local Area Plan, and Ballymastone Framework Plan all align in their intent to deliver residential development on the current application lands, and community infrastructure on immediately adjacent and accessible lands to the east. Connections, linkages and permeability to be delivered in Ballymastone all align to link these community infrastructure zoned lands to existing residential areas and Donabate village.

Grounds for Appeal

1. Contravention of the Fingal County Development Plan (2023-29) Development Management Standards Objective DMS078

(a) Inappropriate methodology in the catchment area

The Appeal references that the methodology used in the Community & Social Infrastructure Report is contrary to FCC Objective DMS078 in relation to use of catchment area i.e. the requirement to conduct a community and social infrastructure audit within a 1km radius of the subject site.

Section 1.3 Methodology of this Report sets out the approach and methodology used as follows:

In line with Objective DMS078 of the Development Plan, this report has been prepared using a 1km catchment area to capture existing social and community infrastructure surrounding the site. However, given the location of the site at Donabate (a coastal community), a 5km

catchment area (radius) has also been selected to capture the range of facilities in the wider area. It is acknowledged that this 5km radius extends beyond the peninsula of Donabate-Portrane, and the linear distance may be longer.

It is clear from the Community & Social Infrastructure Report submitted with this application documentation that a 1km radius was indeed used as the basis for this audit, with a supplementary 5km radius used, clearly set out and delineated, in maps and table form, clearly distinguishing between the radii used.

The report notes the accessibility in sustainable transport modes of walking, cycling, rail and bus, in linear 1km distance and in 5km linear distance for reference. An additional 5km radius was provided to give overall context to the existing provision in the area as stated in Section 1.3 Methodology.

Furthermore, where linear distance and distance by road differ significantly (due to Donabate's location on a peninsula), this is also clearly set out in the tables on each of the facilities referenced.

It is noted that whilst the concept of a '15 minute city' is good practice (as raised in the Appeal), it is not statutory in terms of assessing social and community infrastructure within the administrative area of Fingal County Council, and is instead captured by FCC Development Plan with reference to the 1km radius.

It is asserted that this Report is clear in its intent – text and graphics, is absolutely not misleading, and clearly sets out its terms of reference and its approach, fully meets the requirements of FCC Development Plan objectives to align with a 1km audit for the area, and proceeds to then set Donabate in its wider context, noting the strong network of towns in north county Dublin, and strong public transport linkages between these towns on the rail and bus network.

Facilities

Section 3.1 of the Community & Social Infrastructure Report sets out the approach to consideration of community facilities. The inclusion of recycling facilities are considered to be an essential community and social infrastructure facility and amenity (often defined as the *physical infrastructure necessary for successful communities*), supported by FCC Development Plan in relation to social infrastructure provision in support of waste management and recycling (Objective IUO31).

In addition Objective SPQH05 – Amenity of Town and Village Centres of the Development Plan, refers to enhancing existing towns and village centres with adequate bins and recycling options.

(b) Incorrect Data

BSM acknowledge the error within the Community & Social Infrastructure Report in relation to the provision of a permanent swimming pool at Donabate Portrane Community and Leisure Centre.

This inaccurate data was obtained from the website for this centre which in fact states:

"The Pool will be indoor within a structured marquee and be fully heated. It will be located at the centre for an initial [...] of 12 weeks from early May 2022." (<https://www.donabatecommunitycentre.com/pop-up-pool-donabate/>)

Noting no further details on this website or other sources, in relation to its removal, it was erroneously considered that the pool was still in situ. This is acknowledged as an error of this report. It is asserted however, that this does not fundamentally change the findings of this report in relation to social infrastructure provision in the area.

Oversubscribed

In relation to the Donabate Portrane Community and Leisure Centre being "oversubscribed" as set out in the Grounds for Appeal, it is noted that the website for this Centre itself seeks to attract a much wider catchment than that of just Donabate-Portrane, and which does not reflect the over-subscription referred to:

"Located just only 5 minutes from the M1 and only 15 minutes from Dublin Airport, our facilities are perfect for people of all ages and ability."

<https://www.donabatecommunitycentre.com/>

Financial Services

The Appeal asserts that the Report erroneously references financial services in Donabate. It is clear from Section 3.1, and corresponding maps and tables, that this is not the case. No error has been made in this regard.

Healthcare Facilities

The Report clearly states the location of, and distance to, the Healthcare Facilities referenced.

Residential development incorporating the provision of public open space, connections and linkages, proposed in this application on lands zoned for housing in the Fingal Development Plan, is in accordance with the Development Plan, the Donabate Local Area Plan and the FCC Framework Plan for the lands.

This application for development complements existing permitted development for the Local Authority Recreational & Educational Hub on adjacent lands zoned CI Community Infrastructure, designed to respond to the growth in population as set out under the LAP and Fingal Development Plan, and in accordance with the FCC Ballymastone Framework Plan.

(c) Omission of Population Profile Figures

Section 2 of the Report clearly sets out the population figures for Donabate, including the 2016-2022 CSO registered growth in population of 24.4% in the town.

Please see Section 2 below for further information on population.

(d) Housing Projections

The Appeal sets out that housing projections based on permitted and proposed development have not been brought to bear on the Community & Social Infrastructure Report in relation to provision of adequate infrastructure. The Appeal fails to reference the extent of committed and permitted community and social infrastructure linked to residential delivery in Donabate, and including directly by Fingal County Council, in the delivery of the Recreational Hub adjacent to the Ballymastone Lands.

The Community & Social Infrastructure Report notes the anticipated population of the proposed development, and notes permitted development in Donabate will deliver further community and social infrastructure including at Ballymastone Phase 1 permitted development, and proposed for Ballymastone Phase 3 development, in line with Donabate LAP and Fingal County Council objectives.

The Report concludes that "The proposed development will stitch into an already established area with significant local facilities. We submit that there are established and yet to be delivered community facilities which will meet the demand created by the future residents of the proposed development.

From the assessment of existing and permitted facilities above, we submit that the proposed development will contribute to the achievement of community objectives and will enable the future vitality of the area."

(e) Lack of Analysis of Transport Facilities

The Community & Social Infrastructure Report provides a summary of public transport provision, in the context that an extensive documentation in this regard has been submitted with the planning application, in the form of a Traffic and Transport Assessment prepared by DBFL.

In this regard, and in response to this Appeal, it is relevant that the DBFL Report at Appendix 1 should be consulted for a comprehensive response to items raised in relation to the Link Road, traffic, transport, roads, and public transport provision.

2. Material Contravention of Population Targets for Donabate

The Appeal sets out that population estimates for Donabate for 2029 as per the Fingal County Development Plan 2023-29, have already been exceeded by approved developments, in addition to this proposed development,

should it be permitted by An Bord Pleanála. It estimates delivery of residential development already permitted, construction of which extends beyond the current Development Plan term of 2029. In this way, it is seeking to assert that the proposed development will add to this breach of population estimates over a period which extends past the 2023-2029 Development Plan period and its estimates.

Donabate is identified as a 'Self Sustaining Growth Town' within Fingal's Settlement Hierarchy (Table 2.20 of the Fingal Development Plan 2023-29). The subject lands are contained within the Donabate Local Area Plan 2016 (as extended), and zoned for residential development in the Fingal Development Plan (both previous and current Plans).

As per statutory notices, the proposed development will consist of the construction of a residential development, which is a continuation of permitted Ballymastone Phase 1 lands (FCC Ref. LRD0008/S3 & ABP Ref. 315288) and represents Phase 2 of the wider development of the Ballymastone Lands (as identified in the Donabate Local Area Plan 2016 (as extended)).

Section 5.2.1.2 Core Strategy, Settlement Hierarchy and Housing Strategy of the Planning Report submitted with this application documentation sets out that *"Table 2.14 of the Development Plan below sets out the total land and housing capacity for the 2023-2029 Development Plan. Within Donabate, a total of 112ha of residential zoned land is identified with the potential for c. 3,912 no. units whilst there are a total of 532 no. extant units."*

The gross site area of the proposed development is c. 13.74ha with a net site area of c. 8.14ha. This represents a fraction of the lands identified by Fingal County Council (112ha) as 'Total Available Zoned Residential Land' within Donabate.

The Planning Report further sets out that *"The proposed development will provide c. 364 no. residential units consisting of 158 no. houses, 82 no. duplex and 124 no. apartments on lands zoned for residential in accordance with both the Core Strategy and Settlement Hierarchy of the Fingal Development Plan 2023-2029."*

The Fingal County Council CE Report on this proposed development concludes:

"The Planning Authority notes that the National Planning Framework seeks to prioritise new homes at locations which can support sustainable development and at an appropriate scale. Donabate is identified as a strategic development area with significant residential capacity within the Regional Spatial and Economic Strategy for the Eastern and Midlands Region. Policy CSP32 of the Fingal Development Plan 2023 - 2029 seeks to 'facilitate development on zoned residential lands within the settlement boundary of Donabate as prescribed in the Donabate LAP and 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."

Therefore, the development of this site is supported in principle at a national, regional and local level."

It is asserted that the proposed development does not exceed the core strategy of the Fingal County Development Plan 2023-29, as these lands are already accounted for within the current Fingal County Development Plan 2023-29 as lands zoned for residential development aswell as in the previous County Development Plan 2016-23.

3. Material Contravention of Objective SS17 of the Fingal Development Plan 2023-2026 and Section 9 of the Donabate LAP regarding Phased Development, Social and Community Infrastructure

It is unclear what this Appeal item references by quoting Objective SS17 of the Fingal Development Plan 2023-2026.

In relation to Section 9 of the Donabate LAP, this Appeal item references phasing of development and notes that while this proposed development *'has submitted a phasing plan, that there is no mechanism to control the pace of its implementation.'*

It is submitted that the phasing proposed delivers significant infrastructure as set out in the proposed development, including public open space, pedestrian and cycle connections and linkages and new road infrastructure as required under the Donabate Local Area Plan, proposed new foul pump station, and other infrastructure and utilities. All of this contributes to the achievement of the aims and objectives of the Fingal County Development Plan and Donabate LAP in the delivery of new residential neighbourhoods in Donabate.

Section 5.2.2. of the Planning Report submitted with this application, sets out how the proposed development aligns with the phasing requirements of the LAP.

4. Material Contravention of Objectives CIOSP3,4,5,6 of the Fingal Development Plan 2023-29 and Section 6 of the Donabate LAP regarding provision of Community Facilities and Services

The Appeal states that FCC has not adhered to the FCC Development Plan nor the Donabate Local Area Plan in the delivery of community facilities.

In this regard, the Donabate LAP at Section 8 references the delivery of an Educational and Recreational Campus / Hub at Ballymastone.

The permitted Fingal County Council Recreational Hub (Reg. Ref. Part XI/004/21) at Ballymastone to the east of the Donabate Distributor Road, will be delivered to meet the growing population requirements of Donabate. It is planned to include for amenity and leisure including athletics track, all weather and grass pitches, skatepark, and playground, on an extensive land bank zoned CI Community Infrastructure. This permitted community infrastructure is progressing for delivery in 2026,

which will therefore be in place prior to delivery of this proposed residential project, which has a stated estimated construction period of 2.5 years.

We understand from FCC that the following timelines are anticipated for this project delivery:

- To date the following works have been completed: Ground Investigation works, Preliminary site investigations, Engagement with ESB & Uisce Eireann.
- An Integrated Design Team is being appointed in October 2024 to prepare the technical specifications on all aspects of the project and to prepare the tender package.
- In November 2024 the undergrounding of existing overhead cables is planned.
- The Detailed Design Stage is commencing in October and projected to complete in December 2024.
- The tender is expected to issue in January 2025 with contract award anticipated in March 2025.
- Construction is projected over 18 months (March 2025 – September 2026).

It is submitted that in delivering residential development at Ballymastone, including in this proposed Phase 2 of development, GVH is aligned with the intent and objectives of the Donabate Local Area Plan, the Ballymastone Framework Plan, and the Fingal Development Plan in the delivery of housing in this area.

3.3 Appeal by Donabate Portrane Community Council

At the outset in response to this Appeal, we wish to state that Glenveagh is in continuous active engagement with the community and key community representatives particularly with respect to the ongoing construction, but also through the planning process and will seek to continue this positive engagement in the delivery of a sustainable community at this location.

It is noted in the Appeal introduction that the Community Council is opposed to further housing without commitment for further community gains. This is responded to below, through the Grounds of Appeal raised.

Grounds of Appeal

Density

The appeal grounds identify that it is considered that the density is in excess of what should be permitted, should be in line with the Fingal Development Plan 2023-29 alignment with the 2009 Sustainable Residential Development in Urban Areas, and that it fails to assess current public transport capacity in relation to train services.

At the outset it is considered that the densities achieved on this scheme are regarded as the minimum densities that should be achieved when considered against national policy given the location, accessibility, and scale of the site.

With regards to density, the LAP in Section 8.2.3 sets out that *'The Ballymastone development lands include approximately 38.3ha (taking into account the existing football club facilities and the land-take for the Distributor Road) and therefore have the capacity to provide for approximately 1,000 no. residential units, based on an average density of 35 units per hectare. The residential character of development on these lands will comprise a mix of units, predominantly two-storey in height and serving both public and private housing needs.'*

Further in the Plan, in Section 8.3.4, it states that *'Generally, it is anticipated that an overall density of residential development of approximately 35 dwellings per hectare will be targeted in the LAP lands'* but also, the same section includes a Table identifying that the Ballymastone Lands at 38.3 hectares, would yield approximately 1,200 units (which would equate to a density of 31.3 units per ha).

Proposed density

As noted in 5.1.4 of the Planning Report submitted with the application for the proposed development, the 2024 Sustainable Residential Development

and Compact Settlement Guidelines for Planning Authorities, replace the *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities* (2009) which in turn replaced the replaced the *Residential Density Guidelines* in 1999. The Guidelines set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements.

Since the publication of the Residential Density Guidelines 1999 and subsequent 2009 guidelines, planning authorities have been recommended to promote increased residential densities at appropriate locations. The Guidelines noted that *'given the NPF priorities for compact growth [...], the Government considers that it is necessary to expand on the number of density bands contained in the 2009 Guidelines in order to ensure that densities are efficient while, at the same time, tailored to settlement context.'*

Within these guidelines, area and density ranges are set out as applicable to maximise the return on public transport investment. The Guidelines further identify the importance of delivering the densities based on site accessibility. A total density of c.44.7 units per hectare (uph) is provided across the site in accordance with the Guidelines.

The Guidelines reinforce that the planning authority *'is required to have regard to the policies and objective of the Guidelines and to apply the specific planning policy requirements (SPPRs).'*

The proposed overall net density of c. 44.7uph (on a net site area of c. 8.14ha) reflects the designations of the *Sustainable Residential Development and Compact Settlement Guidelines 2024* and is consistent with the overall masterplan for the lands at Ballymastone. It is also a continuation of the density pattern permitted under Ballymastone Phase 1 (FCC Ref. LRD0008/S3 & ABP Ref. 315288). Ballymastone Phase 1 achieved a permitted overall density of c.43.6 units per hectare on a net site area of c. 9.90ha.

Donabate is located within the Dublin Metropolitan Area Strategic Plan (MASP) as set out in the Regional Spatial and Economic Strategy (RSES). Within the *Sustainable Residential Development and Compact Settlement Guidelines 2024* Donabate can be classified as a 'Metropolitan Town (>1,500)' which are further defined within Table 3.3 of the Guidelines. Of relevance to Donabate are - Metropolitan Towns 'Centre and Urban Neighbourhoods' which promotes a density range of 50 dph to 150 dph (net) in the urban centres, and Metropolitan Towns 'Suburban/ Urban Extension' which promotes a density range of 35 dph – 50 dph (net) at suburban and edge locations of Metropolitan Towns. The Guidelines further set out that the density ranges should be *"based on consideration of centrality and accessibility (sic) to services and public transport"*. Table 3.8 of the Guidelines sets out the definitions for terms used to define accessibility.

The subject Ballymastone Phase 2 development falls under the two classifications set out above, based on the areas of the site located within and outside the 1km walking distance of the Train Station, and as per Table 3.8 of the Guidelines. (See Fig. 6.1 below).



1km Walking Distance from Train Station (Source: DBFL TTA 2024)

The western edge of the subject site lies within 1km walking distance of the Donabate Train Station which provides commuter rail services and will form part of the DART+ expansion programme, and therefore falls within the 'Metropolitan Towns - Centre and Urban Neighbourhoods' category (as defined in Table 3.3 of the Guidelines and as referenced above) whilst the remainder of the lands fall outside of the 1km walking radius and therefore fall within the 'Metropolitan Towns Suburban / Urban Extension' category.

The subject site is categorised by 2 no. designations under Table 3.8 of the Guidelines - 'High Capacity Public Transport Node or Interchange' (ie. within 1km walking distance of the rail station) and 'Peripheral' location (given there are no high, or reasonably frequent bus services within 500-1,000m of the site), dictating the density ranges as set out above which are required.

2-storey housing (which is at the lower density range) is proposed to the west of the site in response to the existing site context and adjacency to existing 2-storey residential development, which gradually increases to 3-5-storey duplexes and apartments (with locally increased heights to 6-storeys) towards the east fronting onto the Donabate Distributor Road (DDR).

Public Transport Capacity

DBFL's Traffic and Transport Assessment (TTA), Appendix E carried out a comprehensive analysis of the existing and future bus and rail services based on an assessment methodology which includes trip generation assessment, modal split assumptions, and assignment/distribution. This concluded the additional demand for bus and rail services as a result of the proposed development can be accommodated on the existing and future improved services in the area without any noticeable effect. Please see Appendix 1 for full response to this issue.

Creche / School Demand Assessment

Under Ballymastone Phase 1 (FCC Ref. LRD0008/S3 & ABP Ref. 315288), a creche of c.909 sq.m with an external play space of c.430 sq.m is permitted and has capacity to accommodate c. 182 no. childcare spaces. Under this permitted development, it is estimated that a demand for c.101 no. childcare spaces will be generated. This childcare facility will therefore meet the demand of c.101 no. childcare spaces generated by the permitted development and the additional 83 no. places will serve future residential development of the Ballymastone lands (in tandem with a future creche to be delivered in Phase 3 lands, to meet the demand generated by that phase of development). In accordance with the Childcare Guidelines 2001, the proposed development generates an estimated demand of 81 – 83 no. childcare spaces.

It has been submitted that the early provision of childcare services in initial phases of development at Ballymastone will be in place to serve these Phase 2 lands. This is further set out in the *Schools Demand & Childcare Facilities Assessment* prepared by Brady Shipman Martin which is submitted as part of the Phase 2 LRD application documentation.

In relation to schools, and based on the analysis in the above referenced report, both the primary and secondary schools within the catchment area will have capacity to facilitate future demand. Additionally, following the preparation of the Donabate LAP, the Ballymastone Framework Plan was completed by Fingal County Council which identified the inclusion of 1 no. post-primary school and 2 no. primary schools, all of which are to be consolidated as part of the Education and Recreational Hub.

Data Used

In relation to the data used in the *Schools Demand & Childcare Facilities Assessment* submitted with this LRD application, it is asserted that appropriate data sources are used and applied in the calculation of estimates for childcare demand and schools demand ie. Data is set out and used at the local Donabate level, Fingal County level, and national census data level. This is comprehensively set out in the above referenced report submitted with the application.

Lack of commercial and retail space / services

The Social Infrastructure Report submitted with the application documentation, submits that there are established and yet to be delivered community facilities which will meet the demand created by the future residents of the proposed development.

From the assessment of existing and permitted facilities, it is submitted that the proposed development will contribute to the achievement of community objectives and will enable the future vitality of the area.

Community Gain

In delivering residential development at Ballymastone, including in this proposed Phase 2 of development, GVH is aligned with the intent and objectives of the Donabate Local Area Plan, the Ballymastone Framework Plan, and the Fingal Development Plan in the delivery of housing in this area.

The permitted Fingal County Council Recreational Hub (Reg. Ref. Part XI/004/21) at Ballymastone to the east of the Donabate Distributor Road, will be delivered to meet the growing population requirements of Donabate. It is planned to include for amenity and leisure including athletics track, all weather and grass pitches, skatepark, and playground, on an extensive land bank zoned CI Community Infrastructure.

We understand from FCC that the following timelines are anticipated for this project delivery:

- To date the following works have been completed: Ground Investigation works, Preliminary site investigations, Engagement with ESB & Uisce Eireann.
- An Integrated Design Team is being appointed in October 2024 to prepare the technical specifications on all aspects of the project and to prepare the tender package.
- In November 2024 the undergrounding of existing overhead cables is planned.
- The Detailed Design Stage is commencing in October and projected to complete in December 2024.
- The tender is expected to issue in January 2025 with contract award anticipated in March 2025.
- Construction is projected over 18 months (March 2025 – September 2026).

Traffic Impact Assessment, Trip Rates, Public Transport Capacity

Please see DBFL Report at Appendix 1 for a comprehensive response to items raised in relation to the Link Road, traffic, transport, roads, and public transport.

4 CONCLUSION

It is respectfully submitted that the proposed development will provide an appropriate form of high-quality residential development for this zoned strategic greenfield site.

We respectfully submit that the appeals do not provide any reasoned planning argument which would lead to a review of the decision of the County Council. In this regard we ask that the decision of the County Council is upheld and permission granted for the scheme now before The Board.

APPENDIX 1

DBFL RESPONSE TO APPEALS IN RELATION TO TRANSPORT
AND TRAFFIC CONSIDERATIONS



Technical Note 230127-DBFL-TR-XX-TN-C-002

Subject:	Engineering Submission to Appeal	Produced by:	DG
Project:	Phase 2 Residential Development, Ballymastone, Donabate, Co. Dublin	Checked by:	RK
Job No:	230127 (ABP Ref: ABP-320885-24)	Date:	18 th Oct 2024

This technical note has been prepared to provide a response to traffic and transportation related items raised in third party appeals in respect to planning reference ABP-320885-24. The following summarises the key traffic and transportation items raised (in blue text) and corresponding response or clarification of how these have been addressed. For ease of reference a numbering system has been applied based on the order that the items appear in the relevant appeal.

The Links Residents Association - Item 1 (Page 3):

The provision of the Link Road and of the vehicular access points onto The Links Road/Portrane Road outlined in the proposed road layout will create major traffic issues along the Portrane road. The Portrane Road is an old country road not fit for purpose and not fit for additional vehicular traffic. The road hierarchy includes access from all developments (Lanestown development, Tilberry and Ballymastone) onto the Links and Portrane Road. Our clients believe this is in effect a through road which will become a rat run. The Portrane Road will be unable to maintain this level of traffic.

Response:

The future performance of Portrane Road (L2170) / The Links junction as well as the performance of the Main Street (L2170) / Portrane Road (L2170) junction and the Portrane Road (L2170) / Donabate Distributor Road (DDR) (R126) junction are presented in the Traffic and Transport Assessment (TTA), Chapter 7 – Network Analysis submitted as part of the planning documentation. The TTA illustrates that all three junctions located on the Portrane Road (L2170), mentioned above, will operate within capacity during the AM and PM peak hours from opening year 2026 to design year 2041. The vehicle trips from the Lanestown development, Tilberry and Ballymastone developments were also included in these assessments.

DBFL's Traffic and Transport Assessment (TTA), Chapter 1 illustrates that the introduction of a modal filter would remove through vehicular traffic from The Links Street, thereby minimising the potential for external traffic to use the Ballymastone internal network as a short-cut when accessing the strategic road network (i.e. DDR). Under this arrangement, large planters will be implemented at the modal filter point with a fixed bollard. The carriageway either side of the modal filter will remain at 6.0m wide. The location of the modal filter is illustrated in Figure 1-1 below. An analysis was undertaken to quantify the potential change in vehicle flows on the internal local street network within the proposed development as a result of the modal filter introduction.

The east-west street most impacted by the redistribution of traffic is retained as a Local Street, illustrated in Figure 1-1 below, incorporating appropriate traffic calming measures such as slight changes to alignment and raised pedestrian crossing points, in order to help to maintain low vehicle speeds through the internal road network, as well as preventing this from becoming a through route (rat-run) for external traffic.

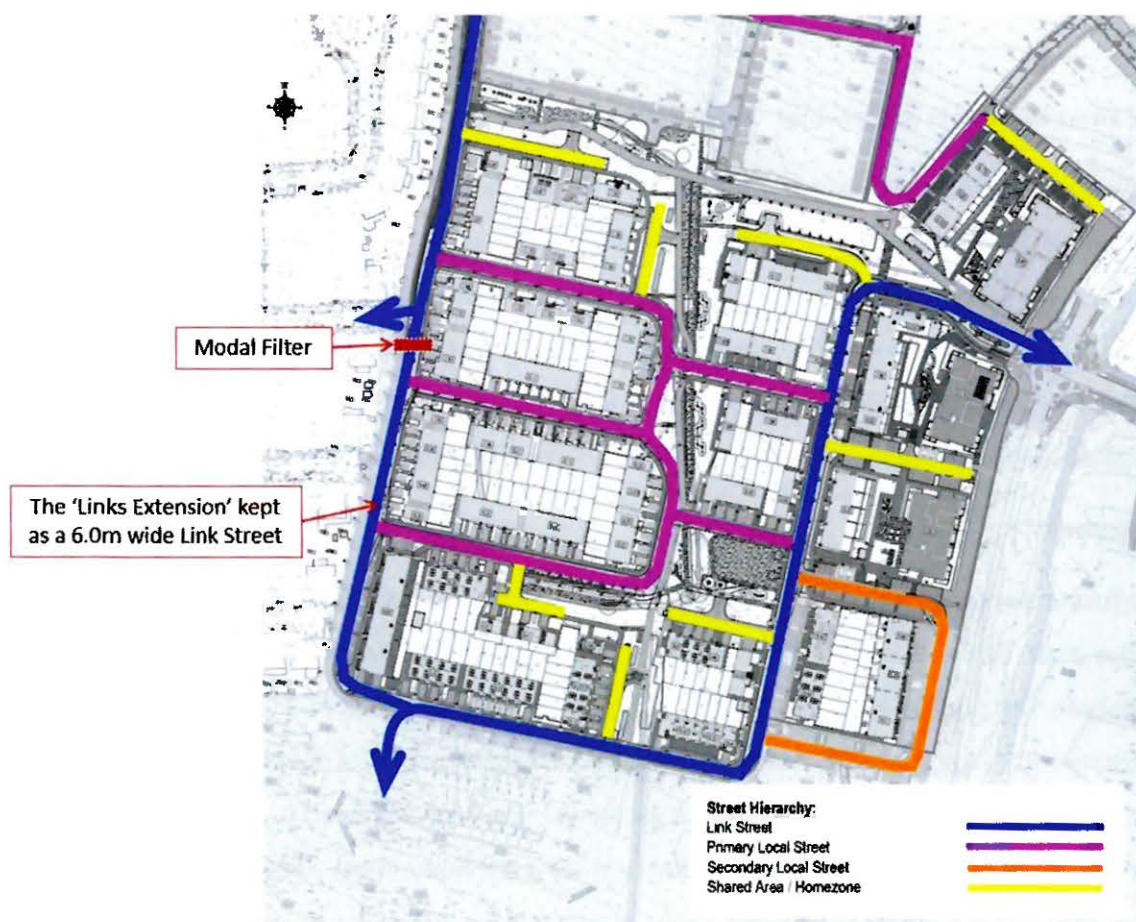


Figure 1-1: Subject Scheme Proposed Road Hierarchy including Modal Filter Arrangement

The Links Residents Association - Item 3 (Page 4):

Based on the 2022 Census the projected number of cars generated from this development could be approximately 516 (1 household car 42% of 364= 152 2 household cars or more 50% of 364= 364) with approximately 614 cars in phase 1 and 339 cars from the Lanestown and New Road developments. This brings the total estimated number of cars from this development, phase 1, New Road and Lanestown to 1469. Our clients believe this road will not only increase cars on our already overburdened country roads but will actually promote car usage. This is in contravention of National Planning Policy, the Fingal Development Plan.

Response:

Although the 2022 Census displays a high car ownership percentage rate within the surrounding areas the Applicant disagrees with the statement that the projected number of cars generated from this development could be approximately 516. Existing car ownership rates are a product of more generous car parking provisions which were generated under previous FCC Development Plans. There are only 278 no. car parking spaces provided as part of the application, of which 260 no. are residential. This level of provision is in accordance with Chapter 4 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (July 2023), Chapter 14 (Table 14.19) of the Fingal Development Plan (2023-2029) for Zone 1 developments and is also in accordance with Chapter 5 of the 'Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities' (January 2024). Similarly Phase 1 provides 554 no. car parking spaces instead of the 614 no. referred to above.

Measures have been taken to ensure that the number of cars that will be parking at the residential units are the same as have been outlined within the proposal, i.e. 260 no. car parking spaces for the 364 no. units.

The layout of the in-curtilage areas for the 3 and 4 bed units, as shown in CSR Drawing No. 19164_2-C-2-107 and the architects (MDO) drawing package, has been narrowed where necessary to ensure they can only serve one vehicle for parking.

The mid-terraced units which have no in curtilage parking have a small paved area to facilitate access to the bin / bike stores. The boundary of this area, i.e. where it adjoins the back of path is secured with a low boundary fence and planting strip as shown in CSR Drawing No. 19164_2-C-2-107. The fence will prevent any obstructive parking of vehicles / trailers across the footpath.

The Applicant disagrees with the statement that the road will not only increase cars on our already overburdened country roads but will actually promote car usage. The development does not promote car usage and instead promotes active travel modes through the provision of three mobility points and the provision of cycle parking for the duplex, apartment and house units in accordance with the FCC Development Plan standards. The Mobility Points include cycle parking (including cargo bike spaces), car club spaces (6 no. GoCar car sharing vehicles) and public EV Charge Points but can also be extended to include a shared bike scheme.

There are several pedestrian/cyclist access points located along the DDR offering excellent levels of connectivity to/from the pedestrian and cycle facilities along the DDR as well as connections eastwards to the Recreational Hub development via the upgraded DDR junction being delivered as part of the Phase 1 development. There will be pedestrian/cyclist connectivity westwards to Donabate village via the permitted Phase 1 development which will provide linkages to key services in the village as well as Donabate Train Station.

The response to the previous item addresses that the introduction of a modal filter would remove through vehicular traffic from The Links Street, thereby minimising the potential for external traffic to use the Ballymastone internal network as a short-cut when accessing the strategic road network (i.e. DDR).

The Links Residents Association - Item 4 (Page 4):

The applicant did not carry out any detailed assessment of capacity on public transport which is extraordinary given the premise of this development and densities are dependant not only on the ability to access public transport, in this case the train station and public bus service it is also dependant on the ability of commuters to be able to access a train or bus. The Urban Development and Building Heights Guidelines (2018) promotes higher densities but is predicated by an acceptable public transport capacity. Our clients wish to state categorically that the train service at peak time is full to capacity and the 330 bus service is full to capacity in the mornings which has resulted in commuters returning to their cars thus increasing vehicular traffic on our roads.



Donabate Portrane Community Council - Item 1 (Page 9):

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.

Response:

DBFL's Traffic and Transport Assessment (TTA), Appendix E carried out a comprehensive analysis of the existing and future bus and rail services based on an assessment methodology which includes trip generation assessment, modal split assumptions, and assignment/distribution. These assumptions were based on data extracted from CSO 2022 Small Area Map Data. This data was used to quantify the anticipated demand for both bus and rail services as a result of the proposed development in this particular location, utilising current local modal shift patterns & statistics.

DBFL's Traffic and Transport Assessment (TTA), Appendix E concluded the additional demand for bus and rail services as a result of the proposed development can be accommodated on the existing and future improved services in the area without any noticeable effect. The analysis is based on 2022 CSO travel patterns, and whilst the development seeks to encourage modal shift, given the relatively small increase in predicted bus / rail demand, any possible future changes in demand due to increased modal shift (walking, cycling, increased working from home and public transport etc) will still have only negligible impact on bus capacity, and slight impact on rail capacity.

The LRD0017/S3 "Corballis East" planning application which was included as a committed development in DBFL's Traffic and Transport Assessment (TTA), granted permission on 04/04/2024, carried out occupancy surveys at peak periods on existing bus services in Donabate. The results of these surveys are included in the Traffic and Transport Assessment submitted as part of the "Corballis East" planning application. The location of the bus stops surveyed are shown in Figure 1-2.



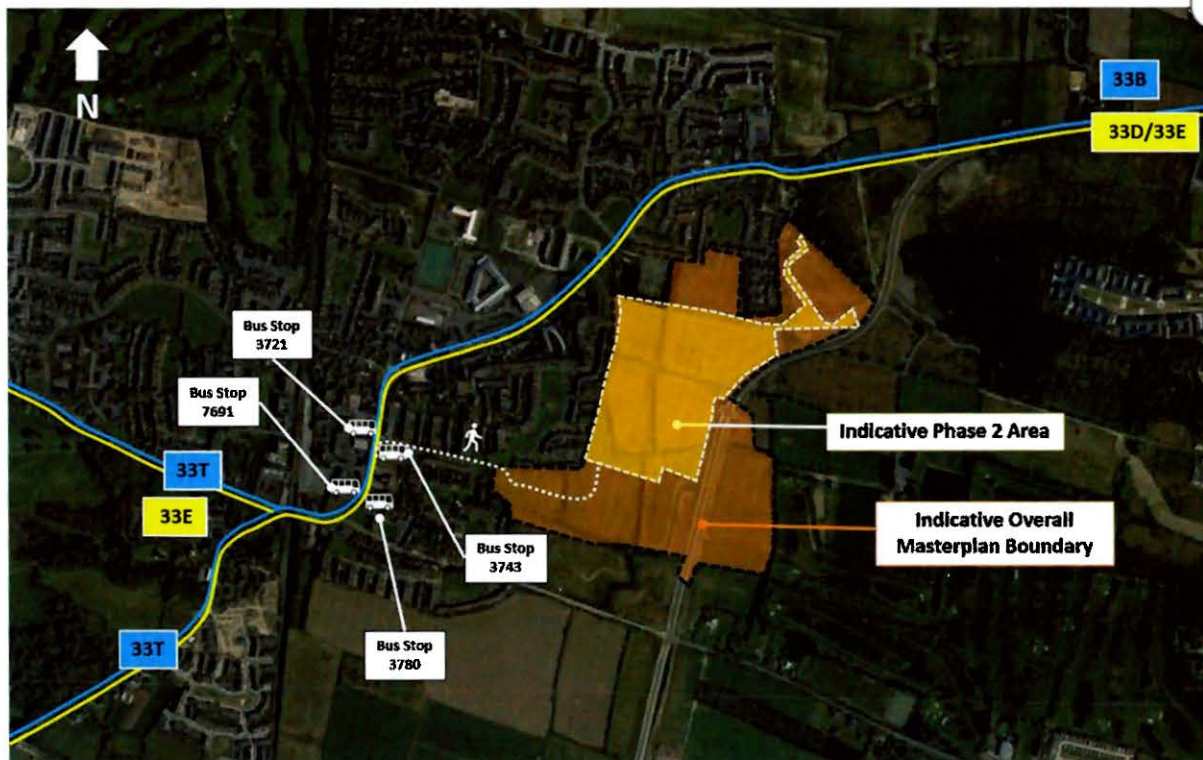


Figure 1-2: Location of Surveyed Bus Stops

The dates surveyed were over a period of five consecutive days between 17/04/23-21/04/23 for each of the identified peak periods (07:00 – 09:00 and 16:00 – 18:00). The results of the bus occupancy surveys illustrated that in the AM peak period the approximate capacity available on the northbound buses will be 637 and on the southbound buses it will be 701. For the PM peak period the approximate capacity available on the northbound buses will be 297 and on the southbound buses it will be 281.

DBFL's Traffic and Transport Assessment (TTA), Appendix E illustrates that the proposed development is anticipated to create an additional demand for approximately 29 seats on bus services during each peak period. Comparing this to the approximate available capacity shows that there will be more than sufficient capacity for the bus services around the development to accommodate the demand.

DBFL's Traffic and Transport Assessment (TTA), Appendix E illustrates that the proposed development is anticipated to create an additional demand for approximately 80 seats on rail services during each peak period. The additional demand created by the proposed development on the rail services during the peak periods, 07:00-09:00 and 16:00-18:00, for all routes is 6% or

less. It is concluded that this additional demand for rail services can be accommodated within the existing services.

As set out in DBFL's Traffic and Transport Assessment (TTA), Chapter 2 submitted with this application, there are additional services to be created as part of Dublin Area Rapid Transit (DART)+ Programme in the future. The DART+ Programme seeks to increase this electrified network to 150km, in order to facilitate increased train capacity to meet current and future demands which will be achieved through a modernisation of the existing railway corridors. The DART+ Programme will be accompanied by a significant investment in rail carriages which will be required to serve these corridors.

Notwithstanding the above the Greater Dublin Area Transport Strategy 2022-2042 states that *"In a developing region, travel demand patterns don't remain static and will evolve over time. As the forecast population grows, and the other demand factors change, the pattern and scale of travel from each part of the city and region will change. For the light and heavy rail network, this growth will be addressed by increasing the frequency of services or the capacity of the vehicles, or both. In relation to the bus services, a similar approach will be taken where the response to demand growth will be to increase the frequency of service or to use larger bus vehicles or both."*

The Greater Dublin Area Transport Strategy 2022-2042 also states *"It is the intention of the NTA to continually monitor the demand for bus services in the Dublin Area as part of the roll-out of the new service network and as part of the monitoring and periodic review of the Transport Strategy, and enhance or amend the service network as appropriate."*

The Greater Dublin Area Transport Strategy 2022-2042 also states *"The DART+ Programme will be implemented, providing electrified services to Drogheda in the north and Maynooth plus Celbridge in the west, in addition to an enhanced level of service to Greystones. The programme will include additional fleet, aligned with higher passenger demand, and a higher frequency of service on all lines."*



The Links Residents Association - Item 6 (Page 4):

Our clients believe in order to be compliant with the Development Plan, National Planning Framework and Climate Action Plan 2024 all access points should be pedestrian and cycle access only. Bollards should be provided at all access points to encourage pedestrian and cycle access only and to encourage walking to the schools and community centre which are accessed off the Portrane Road.

Response:

As set out in DBFL's Traffic and Transport Assessment (TTA), Chapter 4, the vehicle connections to The Links will be priority junctions and a number of these junctions will include raised tables to aid both traffic calming and enable pedestrian/cyclist to assert a level of priority when crossing junctions.

At the point where the existing 'The Links' street will be extended, it is proposed to implement a modal filter arrangement. Under this arrangement, large planters will be implemented at the modal filter point with a fixed bollard. The introduction of the modal filter would remove through vehicular traffic to/from The Links street, thereby minimising the potential for external traffic to use the Ballymastone internal network as a short-cut when accessing the strategic road network (i.e. DDR) and the Portrane Road.

The design of the modal filter offers the Local Authority the potential to monitor the operation of the modal filter following the completion and occupation of the Ballymastone residential development, with the option of either retaining it and making it permanent or alternatively removing the filter and permitting through traffic movements. It is noted that the physical works required to reverse the modal filter arrangement would be minimal.

The Links Residents Association - Item 5 (Page 4):

There are no plans in the short to medium term to improve the public transport network. Indeed the introduction of a new timetable on the Northern Commuter Line has seen large gaps in services at peak times resulting in additional commuters turning to their cars.

The Links Residents Association - Item 7 (Page 4):

Our clients also wish to highlight that there are no plans in the short to medium term to improve the public transport network. Indeed the introduction of a new timetable on the Northern Commuter Line



has seen large gaps in services at peak times resulting in additional commuters turning to their cars. It is important that the Board takes this cumulative impact into consideration when considering the merits of the proposed development. Our clients ask the Bord to note the commencement of 175 units on the New Road, Donabate which are estimated to be completed within 18 months which will further increase the traffic on this Link Road and Portrane Road and encourage people to drive given our already overburdened Public Transport system.

Donabate Portrane Crossroads - Item 1 (Page 10):

The BusConnects proposals of 2 no. new routes are still in discussion phase and are unlikely to be implemented in the short term. The DART+ programme which includes the proposed modernisation and improvement of the existing rail network has been promised for over twenty years. There are no signs of it being implemented within the next five years therefore it should not be included as a benefit in the report.

Response:

As set out in DBFL's Traffic and Transport Assessment (TTA), Chapter 2, the current electrified DART network is 50km long, extending from Malahide and Howth in the north to Greystones in the south. The DART+ Programme seeks to increase this electrified network to 150km, in order to facilitate increased train capacity to meet current and future demands which will be achieved through a modernisation of the existing railway corridors. The DART+ Programme will be accompanied by a significant investment in rail carriages which will be required to serve these corridors.

The Greater Dublin Area Transport Strategy 2022-2042 states that DART+ is proposed to be delivered within the Short-Term 2022-2030 time period to align with the National Development Plan 2021-2030.

The DART+ Coastal North project has sought statutory approval for its design, with the submission of a Railway Order application to An Bord Pleanála on the 12th of July 2024. The ongoing Statutory Consultation period for DART+ Coastal North has been extended until the 23rd of October 2024. In advance of the full electrification, commuters will benefit from new battery-electric Dart trains by early 2026. These trains will operate on electricity from the city centre to Malahide and continue under battery power to Drogheda.



Regarding the introduction of a new timetable on the Northern Commuter Line the Morning Connolly route services will revert to pre-26th August pattern to address punctuality issues, with minor time changes to accommodate extra services

Iarnród Éireann is to implement a number of significant changes to its timetable from Monday 14th October, following punctuality issues being experienced by customers since a new timetable was implemented on 26th August last.

The Greater Dublin Area Transport Strategy 2022-2042 states that BusConnects is proposed to be delivered within the Short-Term 2022-2030 time period to align with the National Development Plan 2021-2030.

Donabate Portrane Community Council - Item 2 (Page 11):

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.

Response:

This application referenced F24A/0169 is not subject to this application and is acknowledged in Section 3 - Planning History of the Planning Report. It was not included is because it has not been approved yet and it makes amendments to a previously approved application.

Donabate Portrane Community Council - Item 3 (Page 11):

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.

Response:

The methodology and approach of the subject TTA was discussed and agreed to be appropriate with the FCC Transport Planning Department and aligns with TII guidelines. The Hearse Road



(L2170) / Donabate Distributor Road (R126) Junction is considered remote as it is located approximately 2.5 kilometres away from the proposed site by road. Nonetheless it was demonstrated as part of another approved application, that is located closer to this junction, that this junction would operate within capacity with the addition of the proposed developments vehicle trips.

The LRD0017/S3 “Corballis East” planning application, granted permission on 04/04/2024, analysed the junction capacity of the Hearse Road / Donabate Distributor Road (DDR) Junction for the same future design year (2041) as the proposed development. Traffic surveys for this junction were conducted on Wednesday 19 April 2023.

One of the scenarios that was assessed as part of the “Corballis East” development was a “Do Maximum” scenario. This “Do Maximum” scenario allowed for the natural background traffic growth, committed developments, “Corballis East” trips and “Other Developments” trips. The “Other Development” trips included the full buildout of the Ballymastone Masterplan lands and the vehicle trips associated with it including the subject development.

In the 2041 Future Design Year “Do Maximum” scenario, the results indicate that the junction will operate approaching capacity during the AM peak hour with a maximum DoS value of 89% and a corresponding queue of 20.3 pcus being recorded. For the corresponding PM peak hour, the results indicate that the priority junction will operate within capacity with a maximum DoS value of 83% with a queue of 13.1.

As such, the junction will operate within acceptable limits even up to this 2041 “Do Maximum” scenario.

Donabate Portrane Community Council - Item 3 (Page 11):

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 Links Residents Association - Item 2 (Page 4):

The traffic report includes revised car trips based on reduced parking in the development. While parking spaces are reduced it is the view of our clients that the Donabate Peninsula is car dependant due to inadequate public transport system.

Response:

The DBFL Transport Report does not set out the case that residents of Phase 2 will utilise each of their cars less than residents of Phase 1 but instead a case that residential units in Phase 2 will produce less vehicle trips than residential units in Phase 1. The Applicant believes that this is a fair assumption to make based on the significant reduction in car parking spaces provided per unit as a result of the change in the Fingal County Council Development Plan Car Parking Standards between the previous Plan, 2017-2023, which was in place when Phase 1 was approved and the current Plan, 2023-2029. The car parking standards for both development plans are illustrated in Table 1-1 below.

Land Use		2017-2023 FCC Standards		2023-2029 FCC Standards	
		Long Stay	Short Stay	Long Stay	Short Stay
Apartments / Duplexes	1-Bed	1/Unit	1 Visitor space/5 Units	0.5/Unit	n/a
	2-Bed	1.5/Unit		0.5/Unit	
	3-Bed	2/Unit		1/Unit	
Houses	2 Beds	1-2/Unit	n/a	0.5/Unit	n/a
	3+ Beds	2/Unit	n/a	1/Unit	n/a

Table 1-1: Development Management Car Parking Standards 2017-2023 and 2023-2029

Based off the current Fingal County Council Development Plan Car Parking Standards, 2023-2029, the proposed developments residential units can be provided with a maximum of 260 no. car parking spaces. Based off the previous Fingal County Council Development Plan Car Parking Standards, 2023-2029, the proposed developments residential units would be provided with a maximum of 610 no. car parking spaces. The proposed development can only provide less than 42% of the car parking spaces under the current development plan when compared to the

previous development plan. The Applicant believes reduced trip rates are fully justified for this reason.

To estimate the potential level of vehicle trips that could be generated by the proposed residential development, reference has been made to the TRICS database. TRICS provides trip rate information for a variety of different land uses and development types, which can be applied to the subject development. Data supplied for inclusion in TRICS undergoes a procedure of validation testing. Consequently, we consider that TRICS will provide a reasonable indication of traffic generation from the proposed development.

The trip rates applied for the proposed Phase 2 site and future Phase 3 site are different to the trip rates that were used in the Phase 1 application. The Phase 1 trip rates calculated in 2022 were reflective of the parking standards / provision as set out in the previous FCC Development Plan.

However, the trip rates derived for the subject Phase 2 site and future Phase 3 site have been updated to reflect the current FCC Development Plan (2023-2029) parking standards which are significantly lower than the previous development plan. Consequently, as there is a reduced car parking provision, it is anticipated that the resulting trip generation will also be lower when compared to the previous Phase 1 development trip rates.

Donabate Portrane Crossroads - Item 2 (Page 10):

The report outlines the timetables of the bus and rail services but omits to include the well documented problems experienced by commuters trying to use these services. The cancellation of many timetabled bus and rail services on a regular basis has resulted in questions being raised in the Dail. Representations from local Councillors and TDs (on record) have also been made to NTA, Dublin Bus, Iaranrod Eireann and Go Ahead regarding the poor service provision to residents over the past two years.

Response:

Public transport service reliability is not within the remit of the Applicant but rather the National Transport Authority (NTA) and the Public Service Obligations (PSO's).

