

To: An Coimisiún Pleanála,
The Secretary,
64 Marlborough Street,
Dublin 1,
D01 V902

Síle Ní Cheallaigh
2 Skylark Park View
St Marnock's Bay
Portmarnock
D13C61F

15th January 2026

Re: **Register reference LRD0058/S3E, Howth-Malahide Area, Applicant Portmarnock Real Estate Developments Limited.**

Dear Commissioner,

I wish to make a third-party submission on the planning decision by Fingal County Council for **LRD0058/S3E** on the basis that the development is premature and the available infrastructure in its current form in Portmarnock, cannot support the current and future population of the area.

The proposed Phase 1F development under planning reference **LRD0058/S3E**, **does not constitute proper planning and sustainable development**. The application remains **premature and materially deficient**, failing to provide or secure essential social, transport, green and ecological infrastructure, and failing to assess cumulative impacts arising from multiple concurrent large-scale developments in South Portmarnock and surrounding areas.

Approval of the development in its current state at this stage would result in **long-term, irreversible harm** to current and future community wellbeing, environmental integrity and public amenity, contrary to the Planning and Development Act 2000 (as amended), the Fingal County Development Plan 2023–2029, the National Planning Framework (2025), and previously established An Coimisiún Pleanála precedent.

To summarise my basis for this appeal submission is as follows:

- Housing is welcome, but must be implemented sustainably.

- The accompanying population growth will occur in the context of an existing material absence of essential infrastructure, which will negatively impact the quality of life for current and future residents.

- The infrastructure deficit relates to, but is not limited to, the following:
 - Inappropriate or **incomplete footpaths** from the estate connecting to local amenities (contravenes numerous guidelines and objectives, see below)
 - **Insufficient active travel links** from the development to schools and the village center (contravenes as above, and Project Ireland 2040, National Planning Framework (first revision 2025), as well as Sustainable and Compact Settlements- Guidelines for Planning Authorities (2024)).
 - **Absence of community facilities** such as a community center and play spaces, in particular for older children and teenagers (contravenes South Portmarnock Area Plan (2013-2023), the new Fingal County Council Development Plan 2023-2029, and FCC Play Policy).
 - No Identification and zoning for new **childcare facilities** outside of the Outer Safety Aviation Zone to support this development (contravenes the FCC South Portmarnock LAP, new Fingal County Council Development Plan 2023-2029 and the Childcare Facilities – Guidelines for Planning Authorities (2001))
 - **Insufficient open green space** (currently 10%, below the required 12-15%) contravening Fingal County Council Development Plan 2023-2029.

I respectfully **request that planning permission is refused** in its current form **until the above issues can be addressed appropriately** by condition or otherwise to meet the appropriate planning guidelines and objectives that **support proper planning and sustainable development.**

The full details of objections, arguments and supporting guidelines and policies are outlined below:

This submission is made on the grounds that **the application, as revised, remains premature and materially deficient**, owing to the absence of essential supporting infrastructure and the failure to account for the cumulative impact, including environmental impact, of concurrent

large-scale residential developments in Skylark, Drumnigh, Kinsealy, Balgriffin, Hailey's Hill and the wider Portmarnock area.

My submission to FCC (uploaded on 4 August) remains valid in full (see Appendix). The substantive issue raised are not resolved, nor by condition, within the Senior Executive Planner's report recommendations.

Accordingly, those concerns are expressly incorporated herein by reference (see appendix).

Given the scale, location and long-term implications of this development, the decision now before the Planning Authority **will have enduring and irreversible effects** on the **social fabric, public amenity, and environmental integrity** of the community **for decades to come.**

The application **does not constitute proper planning and sustainable development** of the area within the meaning of the Planning and Development Act 2000 (as amended) and associated Regulations. It fails to comply with the principles of the National Planning Framework, Regional Spatial and Economic Strategy (RSES), the now expired but highly relevant South Portmarnock LAP and the Fingal County Development Plan 2023–2029.

Grounds for Objection:

1. Deficiency in Community Infrastructure, Educational and Childcare Provision

The proposal is **fundamentally deficient in the provision of childcare facilities.** The applicant's Social Infrastructure Report is inaccurate and misleading, as acknowledged in part by the Planning Authority, **yet no direction has been given for the submission of a revised and accurate report.**

Childcare facilities

The application fails to demonstrate compliance with the Childcare Facilities – Guidelines for Planning Authorities (2001), which provide a benchmark of 20 childcare spaces per 75 dwellings. The development's location in the Outer Public Safety Zone (PSZ) **does not absolve the need by the planning system to provide sufficient childcare facilities on suitable identified lands by the planning system adjacent to the development outside the PSZ.**

Moreover, the **Childcare Facilities – Guidelines for Planning Authorities (2001)** require such facilities to be considered at the pre-planning stage:

“In relation to new housing areas, a standard of one childcare facility providing for a minimum **20 childcare places per approximately 75 dwellings** may be appropriate... **consideration of childcare facilities provision should be raised as early as possible in pre-planning discussions for larger housing developments.**”

A suitable alternative location outside of the Outer Public Safety Zone **should be identified to serve the needs of the community.**

It is not sufficient to rely on the argument that the site’s location within the Outer Public Safety Zone (PSZ) of Dublin Airport precludes on-site provision. The obligation to provide for childcare demand does not cease merely because such provision cannot occur within the development boundary. **The Planning Authority retains a continuing duty to identify and facilitate appropriate locations elsewhere within the settlement area to serve this population.**

Current conditions in Portmarnock evidence a critical shortfall in childcare capacity, with **waiting lists exceeding 20 months**. Simply put, expecting parents would need to know before they are pregnant for a chance to secure a childcare place for when their child is 12 months old. If a parent wishes to return to work before their child is 12 months old, childcare facilities, are for the most part, not an option, because the facilities are at critical capacity. This represents a tangible **failure in social infrastructure and contributes to systemic gender inequality, contrary to Objective PM10 of the Fingal County Development Plan**, which seeks to promote inclusive and balanced communities.

In addition, the lack of childcare facilities **contravenes the South Portmarnock Area Plan (2013-2023)** and the new **Fingal County Council Development Plan 2023-2029** respectively:

*“The population will be **supported by a range of open spaces, recreational amenities and local facilities which will be developed in tandem with residential growth.** As the lands are located within the Outer Public Safety Zone of Dublin Airport, schools and childcare facilities are not permitted uses within the RA (residential) zoning of the LAP lands. Childcare and education facilities are also not permitted within the open space zoned*

*laras, therefore these community uses are not proposed as part of this LAP. Such facilities exist and are **proposed within the adjoining areas, which will also need to accommodate the future educational needs of residents of the plan area.***

*“Equally, the provision of community services and facilitation of a range of **social infrastructure in the correct locations will be important in realising the sustainable growth of our settlements and in limiting the need for unnecessary travel. This includes the identification of appropriate sites for schools, libraries, community facilities, as well as the inclusion of appropriate objectives within the Development Plan to secure the delivery of childcare facilities and other supports for children and families.***”

New facilities in adjoining areas have not been developed to match the population growth of the area.

The failure to provide or secure adequate childcare provision is inconsistent with precedent decisions of An Coimisiún Pleanála, including ABP-321467-24 (refused 16 April 2025) and ABP-314035-22 (refused 2023).

Finally, the applicants Social Infrastructure Audit in section 6.2.2 identified that there is no capacity in any of the facilities identified. Approval of this application without further childcare places will result in an infrastructure deficit an contravene Objective CIOSO27 Childcare and Early Learning, CIOSO28 – Childcare Facilities and New Development of the Fingal County Development Plan 2023–2029 and the “Childcare Facilities – Guidelines for Planning Authorities” document published by central government.

Educational Capacity

The proposal fails to demonstrate that sufficient primary and post-primary school capacity exists or will be provided to accommodate the population arising from this and associated developments. **The applicant’s social infrastructure audit contains demonstrable inaccuracies.** Independent local data from Public Health and having **directly consulted with the Department of Education** on the Portmarnock School Planning Area all data indicate that the **primary-age cohort is increasing**, not declining as stated by the applicant. This **inaccurate use of data in the original Social Infrastructure Report should not be accepted** by the Planning Authority.

There are currently approximately **800 children under five years** of age in the Portmarnock South area as of summer 2025, representing a demand of a **minimum of 160 junior infant places in Portmarnock for the next 5 years**. This equates to an **immediate shortfall of circa 30 junior infant places** before occupation of earlier phases 1D and 1E are realised. The Department of Education, predating many new developments in the wider Portmarnock area, had projected that **Portmarnock has not yet reached its peak**. Therefore this calculated deficit of 30 places is likely a significant underestimation.

Community Facilities

Despite clear policy commitments in the South Portmarnock Local Area Plan (2013–2023) and Objective 8.1, **no community centre or equivalent facility has been delivered**.

“Community facilities will be primarily located within the small centre which will help to foster social inclusion and ensure accessibility to services. In providing new community related facilities, such as a community centre or meeting rooms, the space must be flexible in nature allowing for adaptability which can be delivered through the provision of multi-functional spaces with floor space that will accommodate a variety of uses.”

The failure to address these 3 critical aspects as outlined above **contravenes Chapter 4 of the FCC Development plan 2023-2029:**

*“**Healthy placemaking is a key ambition** of this Plan and National and Regional policy place a strong emphasis on the need to create urban areas that are well-designed, resilient to change and which provide for high-quality public spaces which add character to an area and which are accessible to all. The Sustainable Residential Development in Urban Areas Guidelines 2009 define sustainable communities as ‘areas where an efficient use of land, high quality urban design and effective **integration in the provision of physical and social infrastructure such as public transport, schools, amenities and other facilities combine to create places where people want to live**’.”*

It also **contravenes Project Ireland 2040, National Planning Framework** (first revision 2025) Objective 12, 14, 15 and 37 respectively:

“Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.”

*“Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity, **enhanced levels of amenity and design and placemaking quality, in order to sustainably influence and support their surrounding area to ensure progress toward national achievement of the UN Sustainable Development Goals.**”*

*“...Addressing the legacy of rapid unplanned growth, **by facilitating amenities and services catch-up**”*

Currently, the **services are not in place nor being prioritised** by the planning system to keep pace with the rapid growth in this area, and **therefore Phase 1F is premature and would place unsustainable pressures** on existing facilities.

2. Inadequate Public Open Green Space Provision

The Fingal County Development Plan **requires that not less than 15% of the site area be reserved for usable public open space.** The subject proposal provides only 10.47%, equating to a **deficit of approximately 4,200 sqm, or one-third below the required standard.**

I respectfully **reject the proposed option of a financial contribution in lieu of appropriate green space,** as the additional open public **greenspace is more valuable** for children to play in, for biodiversity, people to congregate and for overall good health, well-being and social cohesion in the long-term. Paying a contribution in lieu of providing appropriate public green infrastructure does not benefit the community.

If regrettably, a financial contribution remains to be recommended despite the issues above, this should be **ring-fenced for the Portmarnock community and on condition to fast-track high-quality continuous active travel infrastructure** for this community, connecting people to other available open public spaces and community facilities.

The lack of green space contravenes the following strategies and policies:

- **Fingal County Development plan 2023-2029- which sets a 15% target**

- **Project Ireland 2040, National Planning Framework (first revision 2025)**

*“Green adaptation which seeks to use **ecological properties to enhance the resilience of human and natural systems** in the face of climate change, such as creation of green spaces and parks to enable better management of urban micro-climates.”*

*”**Objective 36:** Support the objectives of **public health policy** including the Healthy Ireland Framework and the National Physical Activity Plan, though integrating such policies, where appropriate and at the applicable scale, with planning policy.”*

I note that the Senior Planning Executor **report from FCC recommends the planting of a hedgerow** on the outer edge of phase 1F adjacent to the greenway.

Additional native hedgerow is welcome, however I would also like to suggest that **native trees with a significant mature height and a large canopy** should be **planted on both sides of the greenway**. This will support the future character of the area in three key ways, upholding **Project Ireland 2040, National Planning Framework aim** to leverage ecological properties to mitigate against the effects of climate change :

First, it will **provide shade** in the future to **protect against the extreme heat** of summers that will arise with climate change, making the greenway useable during summer heat. This would support the **National Policy Objective 54:**

“Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.”

Second, it will **provide acoustic buffering** from vehicular traffic noise. This would support **National Objective 52** in relation to avoiding, mitigating and minimising or promoting the proactive management of noise.

“The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the requirements of all relevant environmental legislation and the sustainable management of our natural capital.”

Third, it will help **absorb air pollution** from the increased traffic that will contribute to the ambient air pollution. This would support the **National Policy Objective 54**:

“Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions.”

3. Absence of Play and Youth Infrastructure

The applicant’s reliance on the proposed ‘Racecourse Park’ is misplaced. The park remains unimplemented despite approval more than three years ago, is located approximately 28 minutes’ walk from the proposed development (outside of the Play Policy guidelines), and is currently subject to unresolved delays, making it unlikely to be built on time to serve the children of this community.

The absence of pocket parks, playgrounds or appropriate space for play for children and teenagers **contravenes Fingal County Council own Play Policy, and should not be accepted**:

*“It is Fingal County Council’s policy that Play facilities shall be provided at a rate of 4 sq. m per residential unit. **All residential schemes in excess of 50 units shall incorporate play facilities** clearly delineated on the planning application drawings and demarcated and built, where feasible and appropriate, in advance of the sale of any units.”*

It is unclear **what condition could be applied to provide more play area with already significantly reduced public open space below the prescribed minimum. The issues blocking progress on Racecourse Park need to be resolved at minimum.**

4. Active Travel and Road Infrastructure

While some active travel measures are proposed, the **absence of dedicated cycle lanes and**

safe pedestrian connections to adjacent areas will perpetuate car dependency, contrary to the principles of compact growth and sustainable mobility.

This is even more critical for this area under the OPSZ which restricts on site provision of many essential services and **should be fast-tracked and prioritised prior to the approval of phase 1F to connect them to critical social infrastructure** including local schools and green spaces.

Furthermore, the road design is straight and will encourage speeding, making it dangerous for children to play and cycle near their homes in Phase 1E and 1F.

Not providing proper and timely active travel infrastructure **contravenes the following strategies and policies:**

Project Ireland 2040, National Planning Framework (first revision 2025)

*Objective 37: “Ensure the **integration of safe and convenient alternatives to the car** into the design of our communities, by **prioritising walking and cycling** accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.”*

Sustainable and Compact Settlements- Guidelines for Planning Authorities (2024):

It **does not meet the key quality indicators of design and good placemaking** set out in this guideline and contravenes the following key principles:

*“New developments should, as appropriate, include a street network (including links through open spaces) that **creates a permeable** and legible urban environment, **optimises movement for sustainable modes** (walking, cycling and public transport) and is easy to navigate.”*

*“New developments should connect to the wider urban street and transport networks and **improve connections between communities**, to public transport, **local services and local amenities** such as shops, parks and **schools**, where possible.”*

*“Active travel should be prioritised through design measures that seek to calm traffic and **create street networks that feel safe and comfortable for pedestrians and cyclists.**”*

5. Environmental Impact Assessment

The Environmental Impact Assessment Report (EIAR) contains **significant deficiencies relating to lighting, biodiversity, and habitat protection.**

The report states:

“There will be no impacts on the bird species/wetland habitat of Baldoyle Bay SPA nor on the habitats or species of Baldoyle Bay SAC arising from the delivery of the proposed”

However, **this statement is contradicted by their finding of red and amber listed bird species** (red-listed kestrel, oystercatcher, golden plover, lapwing, black-tailed godwit, curlew, meadow pipit and redwing, as well as the amber-listed lesser black-backed gull, skylark, barn swallow, house martin, mallard, black-headed gull, common gull, herring gull, northern wheatear, willow warbler, goldcrest, starling and linnet have all been recorded in surveys undertaken in the preparation of the current planning application) on the lands. And that the lands are of **higher value local importance** for birds (ie semi-natural habitat types with **high biodiversity in a local context**, populations of species that are uncommon in the locality, or of International Value).

Furthermore, the EIA reports that **some of the red and amber listed species have been found to be breeding and foraging on these lands.**

“the red-listed meadow pipit was confirmed to be present on the Phase 1E lands and is known to have bred on the wider lands in recent years... Linnet (amber-listed) was also confirmed as breeding on the wider lands between 2023 and 2025... “

“mallard, herring gull, lesser black-backed gull, skylark, barn swallow, house martin, starling and linnet (all amber-listed) have been recorded either on the Phase 1F lands (foraging) or in the wider Portmarnock South LAP lands.”

For clarity, ~~Red-listed species are of high conservation concern due to severe declines,~~ global threats, or having a very small or declining population. **They require the highest priority for conservation action**, and are protected under the EU birds and habitats directives. The Birds Directive requires all Member States to **protect all wild bird species and protect and restore their habitats.**

“(8) The preservation, maintenance or restoration of a sufficient diversity and area of habitats is essential to the conservation of all species of birds. Certain species of birds

should be the subject of special conservation measures concerning their habitats in order to ensure their survival and reproduction in their area of distribution. Such measures must also take account of migratory species and be coordinated with a view to setting up a coherent whole.”

Given that Phase 1E has already been approved, **protecting the red and amber listed bird species breeding grounds in this Phase is even more critical.**

Furthermore, the application will have a **negative impact on the grassland habitat.** The EIAR clearly states that the southern grassland/scrub matrix is a **key ecological receptor.** Therefore, it should be retained.

The application **contravenes the EU habitat directive with additional protections for semi-natural dry grasslands** as it is one of the most threatened habitats. The application as a whole demonstrates a material contravention to important EU and National legislation for the conservation of wild animals, habitats and biodiversity.

6. Other Notable Policies and Guidelines

(i) Delivering Homes Building Communities

In the recent Irish government housing plan delivering Homes Building Communities published November 2025 . Priority 1 is identified as:

*“Ensure a strong pipeline of zoned and serviced land is available to support the delivery of 300,000 homes. Building 300,000 new homes, requires a sufficient pipeline of available land. Government will take action across a range of areas to ensure a sufficient pipeline of suitable zoned land is available for housing development, and to provide a greater level of certainty in relation to the planning process and timelines. Aligned to this, Government will ensure that **new homes are built in the right locations, with the necessary services and community facilities in place, in keeping with our climate action goals, and the wider spatial growth of the State. The scale of delivery will require both the expansion of existing settlements and the creation of new sustainable communities.**”*

The government have made clear policy priority that homes are build with the necessary services and community facilities in place. This planning application delivers the homes but does not deliver supporting services and community facilities to match the population growth.

(ii) Housing for all Policy (2021)

In the previous government housing plan Housing for All published in 2021, in section 3.1 pathways to increase new housing supply the report states

*“By 2040, an additional one million people will be living in Ireland. The State is acting decisively to activate supply across both public and private lands. This is critical to ensuring that the new homes to be built over the next decade are located where housing demand is greatest and where there is **good accessibility to employment, education, public transport, and other services and amenities.**”*

The development is a good location for new housing but requires the matching critical infrastructure in education, active travel infrastructure and supporting amenities, as per government policies.

(iii) ERM Safety Report

This report/guideline makes allowances for development to occur under the flight path where *“in exceptional circumstances, where it is judged that a development’s socio- economic benefits (etc.) outweigh the ‘safety risk’, and that it is impractical for such a development to be located elsewhere.”* It should therefore not preclude the provision of community facilities before a proper balanced assessment of need is made.

Summary

For the reasons set out above, **the proposed development is contrary to the proper planning and sustainable development of the area and conflicts with multiple provisions of local and national policy**, including the Fingal County Development Plan 2023–2029, the Planning and Development Act 2000 (as amended), and Project Ireland 2040.

Should the Planning Authority not consider the critical deficits sufficient grounds for refusal at this time despite its prematurity, **any approval should be conditional upon the prioritisation and immediate planning and implementation of supporting essential infrastructure** prior to the commencement of phase 1F construction, with the view that infrastructure should be committed to be **in place and completed prior to full occupancy of Phase 1E and 1F (2027/2028)**. Particular focus should be placed on active travel links, critical community

infrastructure including childcare facility provision and connections to schools and their expansion, public open spaces, and ecological safeguards.

Thank you again for considering this submission. I appreciate your time and expertise in this valued review.

Go raibh maith agat.

Is mise le meas,
Sile Ní Chellaigh

Appendix

To:

Planning Department
Fingal County Council

Re: Objection to Planning Application LRD0058/S3E– Proposed Large Scale Residential Development in St. Marnock’s Bay, South Portmarnock, County Dublin

4th August 2025

A Chara,

I wish to object to the proposed residential development under planning reference number LRD0058/S3E at St Marnock’s Bay/Mayne Town, South Portmarnock, as it contravenes a number of policies and objectives of the **Fingal County Development Plan 2023–2029 (FCDP)**, previous **Fingal County Council Local Area Plan 2013-2023 (FCC LAP)**, **Portmarnock South Local Area Plan (Portmarnock South LAP)**, **Planning and Development Act 2000**, the Government’s **National Development Plan 2021-2030 (NDP)** and the **Habitat’s Directive**.

I do not object to new houses being built, however the development is premature as the surrounding community infrastructure and facilities have not been developed or expanded to keep pace with numerous large-scale developments in the area that have been built in recent years. There has been a rapid expansion of the population, and a significant change in demographics with a large number of young families, which has placed severe pressure on certain community services and amenities. There are insufficient childcare places, insufficient school places, and insufficient upgrades to transport infrastructure. The Social Infrastructure Audit appears to underestimate the population and overestimate the capacity. The addition of a further 296 units is premature prior to the expansion of surrounding infrastructure to support the growing community.

1. Premature application pending provision of essential infrastructure

This application is premature as it proposes significant additional housing and rapid population growth in an area currently lacking critical infrastructure including adequate roads, footpaths, cycle lanes, public transport capacity, local area community hall, retail, childcare, school capacity, and other important local amenities.

The absence of local infrastructure and amenities in this application contravenes the following policies and objectives:

- i. Policy CSP33 of the Fingal County Development Plan 2023-2029** , which promotes compact, sustainable and infrastructure-led growth in towns like Portmarnock.

 - The Development Plan's overarching objective that new residential development **must be supported by sufficient community, educational and transport infrastructure** to meet the needs of existing and future residents.

- ii. Strategic vision 1.4 of the Fingal County Council Local Area Plan (2013-2023)**, which aimed to “Encourage inclusive and active sustainable communities based around a **strong network of community facilities.**”

 - α. Although this LAP is now expired, it was active for the previous phases of this large scale development which need to be considered as a whole when considering the impact on the community.

- iii. Strategic Policy 1.6, No. 19 of the Fingal County Council Local Area Plan (2013-2023** which states that it will “Ensure the **timely provision of community infrastructure** including schools, recreational, sport facilities and emergency services, commensurate with the number of housing units proposed for construction on lands zoned for residential development.”

If approved, the proposed development would place unsustainable pressure on already stretched local services and roads, undermining proper planning and sustainable development.

2. Pressure on current social infrastructure

The proposed development would introduce a significant number of residential units in an area where:

- Social infrastructure is already stretched beyond capacity;
- There are insufficient childcare places;
- Demand for primary school places outstrips availability;
- Healthcare infrastructure is under significant pressure;
- There is no community hall/multi-purpose use space or similar facility for current and new residents;
- There is no recreational space for older children/teens.

The social infrastructure audit submitted as part of this application does not reflect the reality on the ground. The 2022 census data is outdated, and does not reflect the current population of Portmarnock, as many of the houses had not yet been occupied by April 2022 (census date).

Local data shows that there are approximately **800 children under 5** (0-4 age pre-school) in the Portmarnock area and immediate surrounds. This is **almost double the number stated in the Social Infrastructure Audit** based on 2022 census data, and does not yet include the population of the previous phases 1D (172 units) or 1E (195 units) which are not yet occupied.

For the current 800 children under 5, it means that there is a need for approx. **160-200 junior infant places needed every year for the next five years** (not counting the additional need that will arise from phases 1D or 1E [367 units total]). The school capacity in the area described in the Social Infrastructure Audit appears to be equally inaccurate. The Educational Needs Assessment states that there are 8 primary schools in the area. This is misleading as 5 of the 8 (62.5%) lie outside of the Portmarnock School Planning Area. In addition, some of these schools are senior schools starting at 1st, 2nd or 3rd class and therefore not a part of the capacity consideration for junior infants, the point of entry to accommodate the growing under 5 population of the area. Furthermore, this development is in the catchment area of **just two primary schools**. Based on available information from the Department of Education, they have a combined capacity of 126 places, and one of these schools also serves the Malahide community. Therefore, there is at least a **deficit of 34-74 junior infant places** (if not higher due to the shared catchment with Malahide and additional demand from phases 1D and 1E that which are not yet fully occupied), every year for the next 5 years. **Existing demand already far outstrips capacity** and has been raised in [Dail Eireann](#). The proposed new development will further compound the issue and should be delayed until the necessary capacity has been put in place.

Furthermore Table 5,6 and 8 in the Social Infrastructure assessment (Educational Needs Assessment) are inconsistent. They list two different lists of primary schools and they utilise population data from some surrounding suburbs. They also estimate primary school aged children based on national data, which does not reflect the South Portmarnock demographic profile which has a higher density of young families. Therefore capacity is being overestimated and demand is being underestimated.

Similarly, of the 800 children, the last census (2022) [quantified that 42%](#) (to 56% quoted in some statistics) of children are using childcare facilities or similar (despite this, Table 10 of the Social Infrastructure reports that just 31% of children in creche or similar facility). For the 800 children under 5 already in the area, this equates to 336-448 childcare places needed. This does not include the demand from the soon to be occupied phase 1D and phase 1E of the development (a combined total of an additional 367 new units) , which will place the demand for childcare even higher. There are just 4 creches/Montessori in the area with a combined capacity of 309 (despite Table 12 listing 5). This leaves a deficit of at least 27-139 childcare places for the current population without including the impact of phase 1D, phase 1E and if the proposal is approved, phase 1F. The Social Infrastructure audit appears to underestimate the demand and overestimate the capacity.

The now outdated Environmental Resource Management (ERM) Report in 2003, predating the addition of a second airport runway, is being used to absolve the necessity of expanding childcare and school capacity. This cannot be allowed.

The proposal is in direct opposition of the following policies and strategies:

- **1.6 Strategic Policy No. 19 of Fingal County Development Plan (2017-2023)** which outlines the necessity to
“Ensure the **timely provision of community infrastructure** including schools, recreational, sport facilities and emergency services, commensurate with the number of housing units proposed for construction on lands zoned for residential development.”
- **NSO 1 of the Government’s National Development plan on Compact Growth** in which they aim to

“**secure the sustainable growth** of more compact urban and rural settlements **supported by jobs, housing, community services and amenities**, rather than sprawl and unplanned, uneconomic growth.” and “ Carefully managing the sustainable growth of compact cities, towns and villages will add value and **create more attractive places in which people can live and work.**”

- **NSO 10 of the Government’s National Development plan:** to commit to the “expansion of primary and community care in line with Sláintecare.”
- **Section 7 Objective CF 3 of the Portmarnock South LAP** which underscores the importance of social infrastructure including a community hall that has not been built for the area: “Support and encourage an appropriate mix and level of community services and facilities including health centres, and **community halls/meeting rooms within the small centre.**”

New housing in this compact area, without supporting social infrastructure, will put undue pressure on existing services, surrounding areas who are experiencing their own rapid growth in populations, and be detrimental to the well-being of the community. Houses need to be provided sustainably.

3. Inadequate integration with sustainable transport and active travel.

The development does not demonstrate adequate integration with high-quality public transport and active travel options. Footpaths in the Portmarnock, Drumnigh and Kinsealy area are not sufficient nor continuous to connect communities to villages and amenities.

The proposal would introduce a significant number of residential units in an area where:

- Local roads already experience congestion;
- Footpaths are inadequate, and pose a risk to users.

This would undermine the principle of balanced, sustainable growth, and appear to embed car dependency, contrary to:

- **Objective CM03**, which requires integration of land use and sustainable transport;

- **Policy CMP18**, which seeks to support public transport, walking and cycling over car use.
- **Policy CSP33** of the Fingal County Development Plan 2023–2029 requires compact, infill growth in self-sustaining towns **matched by provision of community and transport infrastructure**.
- **Objective CM03 of the Fingal County Development Plan 2023-2029**, which requires land use planning to be closely integrated with sustainable transport options.
- **Policy CMP18 of the Fingal County Development Plan 2023-2029**, which supports provision of high-quality, accessible public transport and encourages walking and cycling.
- **The Fingal County Development Plan 2023-2029** states that it will prioritise active and sustainable transport to enable “the promotion of compact growth and sustainable densities”, however the density of growth has preceded active travel routes and safe pedestrian routes, leaving communities heavily reliant on car travel. This creates significant traffic in the area.
- **Planning and Development Act 2000** (as amended) the planning authority must consider connection to adequate public footpaths (and other public amenities)

The Traffic Audit of the Environmental Risk Assessment submitted as part of this submission is insufficient. They have used just 1 day of traffic (14th May 2025) and does not account for congestion at the traffic lights. (e.g. the length of the tailbacks) or seasonal variation (e.g. traffic on a sunny day in summer which is extremely high with tailbacks stretching back several hundred metres, rainy winter day is much heavier etc). Selecting a single date is an inadequate reflection of the reality that residents already experience.

New housing at this location, without the necessary transport upgrades and safe cycle/pedestrian links, is contrary to these policies and will worsen congestion. This will negatively affect the quality of life of current and future residents, and is a safety risk to both road users and pedestrians. By proceeding ahead of the implementation of such infrastructure, the development is premature and contrary to the proper planning and sustainable development of the area.

4. Negative impact on the amenity and character of the adjacent greenway

The site directly overlooks / adjoins the greenway corridor planned and protected under the **Portmarnock South Local Area Plan**, which includes a green infrastructure and linear park strategy.

The proposed development would:

- Visually intrude on the greenway and diminish its recreational and ecological value.
- Disrupt the character and enjoyment of this amenity space by residents and the wider community.
- Undermine the character and tranquillity of a space intended for public recreation and biodiversity.
- Encroach on protected bird species including the light-bellied Brent geese.

This is contrary to:

- The LAP's **Green Infrastructure objectives**, which seek to protect and enhance amenity routes.
- **Objective CF1**, which calls for the provision of safe and attractive pedestrian and cycle networks connecting key local amenities.
- The **Habitat Directive**

The development proposed to be built so close to the greenway would compromise these objectives. Setting the houses further back would protect the amenity and provide sufficient greenspace to maintain the character.

In summary, the equivalent of a new town has been built in the area without increasing the social, transport and community infrastructure to keep pace and support the growing community. For the reasons outlined above, the proposed development is:

- Premature in the **absence of necessary infrastructure**;
- Putting undue **pressure on local social community infrastructure** including childcare, schools and recreational spaces;
- **In conflict with sustainable transport policies**;
- **Detrimental to an important greenway amenity** and greenspace protected under the LAP and the Habitat Directive.

Accordingly, I respectfully request that planning permission in its current proposal at this time be refused.

Thank you for considering this submission. Go raibh maith agat.

Is mise le meas,

Síle Ní Cheallaigh