

Cllr. Corina Johnston

Rush Lusk



+353 86 352 2828



corina.johnston@cllrs.fingal.ie



@JohnstonCorina1



/corinajohnstonlabour

Corina Johnston,
67 The Links
Donabate
Co Dublin
K36 EK76

The Secretary
An Bord Pleanála,
64 Marlborough Street,
Dublin 1,
D01 V902

Re Appeal The Links Residents Association, DP Crossroads, Donabate Portrane Community Council
ABP-320885-24

Dear Secretary,

As a Local Area Representative for the Donabate and Portrane area for the past 4 years and recently elected County Councillor I wish to make an observation in support of the appeals submitted by The Links Residents Association, DP Crossroads and the Donabate Portrane Community Council pertaining to Case Number: ABP-320885-24 Planning Authority Reference Number: LRD0039/S3.

In the first instance I wish to address the Community and Social Infrastructure Audit Report submitted by the applicant. This in my opinion is flawed as it fails to take account of the impact of existing permissions and phase 3 of this development within the Ballymastone and Corballis East areas of the Local Area Plan which has been accepted by the Planning Authority. I wish to add that the 5km radius instead of a 1km radius used by the applicant is in contravention of the Fingal Development Plan Objective DMS078 - Community and Social Infrastructure Audit (see below)

- Planning applications for large scale residential and mixed-use developments, of 50 or more residential units, shall include a Community and Social Infrastructure Audit. This audit shall assess the provision of community and social infrastructure within the vicinity of the site and shall identify existing shortcomings in terms of these facilities and assess whether there is a need to provide additional facilities to cater for the proposed development. A Community and Social Infrastructure Audit shall include the following:

- An assessment of existing community and social infrastructure facilities within 1 km of the subject site.
- An assessment of the need in terms of necessity, deficiency, and opportunities to enhance/share existing facilities based future population projections for the area.

Labour



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 /corinajohnstonlabour

- A justification as to whether or not a new community facility will be provided as part of the proposed development, based on the findings of the audit. Where new community facilities are required, they shall have regard to Objective DMS079 above and the following:

- Community facilities shall be flexible in their design and promote optimum/ multi-functional usage, for users of all age and abilities.

- Community facilities shall not have a detrimental effect on local amenity by way of traffic.

Contrary to the report, the existing and future community, social, arts and youth needs of an expanding Donabate and Portrane cannot be catered for within the Donabate Portrane Community Centre or when additional space becomes available when the Library is relocated to the former Credit Union Building. For example at the moment it is virtually impossible for numerous community organisations to hire even a room for a meeting given the demand. Even the refurbished parish hall cannot cater for the demand upon it. There are 45 groups alone on waiting lists for space in the community centre and this is prior to any new residents moving in. These are real problems for our community when according to census 2022 the population of the peninsula has increased to 11,7843. What indoor community infrastructure is the Development Plan and Donabate LAP proposing to provide to cater for our rapidly expanding population which will increase to 20000 by the end of the decade if not before then. It is worth noting that 31% of our present population is under 19 and even temporary accommodation is not available on the peninsula to provide a meeting place for young people. Crosscare have two permanent youth workers assigned to Donabate with no space available to accommodate their needs. Sustainable Planning and Development of any Area must have regard to the Development Plan and the LAP. If not the public many of whom participated in the original consultation process will quickly become disillusioned and lose confidence in the planning process all together. The negative approach taken to-date by the Council is not helpful. The LAP contains residential Zoned lands to accommodate an additional 4,000 housing units which will see an increase in the population of Donabate/Portrane to 20,000 or more. This target will be realised sooner given the speed of building and preparatory work taking place at present. There are positive objectives outlined in the plans which if provided would enhance the concept of sustainable development, for example

Objectives 6.12 of Donabate Local Area Plan

The provision of a Multi Functional Community/ Cultural/ Exhibition and Performing Arts Centre for Donabate/ Portrane which would not be used exclusively by any one group.


*Policy CIOSP3 of Fingal Development Plan 2023-2029

Timely provision of Community Facilities

Ensure the timely provision in conjunction with housing development of community services,resources and infrastructure, including schools, community, religious and health facilities required for the creation of sustainable communities.

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The failure of FCC to date to identify a site or accept the need for the Multi Purpose Facility is a contravention of the LAP and Development Plan and must be addressed as part of this appeal. The people of Donabate are very angry at this attitude by the council given the difficulties they are experiencing at present getting transport to work and college, children into schools and childcare facilities and having to leave the peninsula to register for a doctor as the doctor's surgeries are full the last 2 years. There was an expectation that FCC would deliver on the objectives of their own Development plans. Are they saying " Donabate is getting the 4,000 additional housing units but not the infrastructure as promised in the LAP ".

The Development Plan 2023-2029 has a number of objectives in this regard.

Objective CSO6- Phased Development Ensure the phased development of new housing areas in tandem with the delivery of physical and social infrastructure provision as identified within Local Area Plans or Masterplans, as informed by assessments carried out by the Planning Authority.

Objective CIO505 - Residential Developments and Community Facilities Ensure proposals for large scale residential developments include a community facility, unless it can be established that the needs of the new residents can be adequately served within existing or committed community facilities in the area.

Policy CIO506 - Facilities for Children, Teens and Young Adults Provide appropriate recreational, community, social and educational facilities for children, teens and young adults.


Policy CIO507 - Variety of Community Facilities Ensure the timely provision of community services, recreational facilities (including playgrounds) and resources, including schools, community, religious, burial and health facilities, required for the creation of sustainable communities.

This is not the case in Donabate and I have grave concerns that we are reaching a crisis point on the peninsula such is the lack of basic, social and community infrastructure. A number of key infrastructural objectives in the phasing of the Donabate LAP are yet to be delivered. In this submission I am calling on ABP in their decision to condition the applicant/FCC to identify a suitable site for the provision of the Multi Purpose Community Facility in accordance with the objectives of the LAP and Fingal Development Plan.

I fully support The Links Residents Association Appeal. I recommend that in your decision that direct access from phases 1,2 and 3 of the current development along the Links Road to Portrane Road be restricted to pedestrians and cyclists by means of the provision of bollards which obviously can be lifted in case of an emergency on the adjoining roads. The proposed road layout within this development if granted permission provides vehicular access from the new Distributor Road, Corballis Rd , Corballis East and Ballymastone Phases 1, 2, 3 developments (2500 housings units) the proposed Sports Hub through residential developments onto an already congested Portrane Road which is the access to four schools and community centre. It should be noted that at school opening and closure times there is a back up of vehicles all the way to village centre. As the roads are routed

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through separate developments with road frontage it will become a rat run which will also become an accident worry for young families.

The provision of the vehicular access is totally at odds with many objectives in the Development Plan, National Planning Framework and the Climate Action Plan with a modal shift away from car usage to active travel and the use of public transport.

See objectives from Development Plan 2023-2029 below.

Policy CMP1 - Decarbonisation of Motorised Transport Support the decarbonisation of motorised transport and facilitate modal shift to walking, cycling and public transport and taking account of National and Regional policy and guidance, while supporting an efficient and effective transport system.

Objective CM01 - Transition to Sustainable Modes Work with the NTA, TII and other transport agencies in facilitating the integrated set of transport objectives for the County as set out in this Plan, in line with National and Regional policy including the NTA's GDA Transport Strategy and any subsequent plan to encourage modal shift towards more sustainable modes of transport and patterns of commuting to reduce reliance on the private car.

Objective CMO2 - Modal Shift Work with the NTA to develop mode share targets for the County to achieve and monitor a transition to more sustainable modes including walking, cycling and public transport, during the lifetime of this Plan. This includes providing targeted infrastructure in the most appropriate locations and prioritising development at the most accessible locations in order to achieve the appropriate levels of integration and sustainable transport provision.

Policy CMP5 - Mobility Management and Travel Planning Promote best practice mobility management and travel planning through the requirement for proactive mobility strategies for developments focussed on prioritising sustainable modes of travel including walking, cycling and public transport. 6.5.6 A Sustainable and Integrated Transport Network Promoting the expanded provision of sustainable travel modes such as walking, cycling and public transport based on an integrated network approach will help re-balance the focus to those modes that have lower emissions and contribute to creating high-quality environments across the County as well as improved quality of life for residents, commuters and visitors to Fingal.


The following objective forms part of the National Framework Plan

National Policy Objective 27 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.

I ask the Board to condition the applicant/FCC to provide a site for a multifunctional Community Facility, and that direct access from phases 1,2 and 3 of the current development along the Links Road to Portrane Road be restricted to pedestrians and cyclists by means of the provision of bollards

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which obviously can be lifted in case of an emergency on the adjoining roads in line with the National Framework Plan, Fingal Development Plan and Climate Action Plan.

Kind Regards

Corina Johnston