

BALLYMASTONE PHASE 3
PLANNING REPORT AND STATEMENT OF
CONSISTENCY – ADDENDUM: RESPONSE TO
REQUEST FOR ADDITIONAL INFORMATION
Large-Scale Residential Development

BSM

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**Brady Shipman
Martin**

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Client:

Glenveagh Living Limited

Date:

05 June 2026

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1 Introduction

Brady Shipman Martin (BSM) has been instructed by Glenveagh Living Limited (the Applicant) to prepare this *Planning Report and Statement of Consistency - Addendum* to submit to Fingal County Council (FCC) regarding a proposed LRD at Ballymastone, Donabate, Co. Dublin.

On 17th December 2025 Fingal County Council (FCC) issued a Request for Additional Information with regard to the proposed development, which consisted of 4 no. items. The Applicant is now responding under Article 33(3) of the Planning and Development Regulations (as amended), to the confirmed extension of an additional four months for response to the Additional Information, as agreed by Fingal County Council, for a period up to and including 24 June 2026.

The purpose of this report is to provide a consolidated Response to the Request for Additional Information items, in addition to addressing any direct or indirect changes arising in the proposed development.

In responding to the Request for Additional Information, a number of design modifications and updates to the Proposed Development have been incorporated. All of the design changes to the proposed development are summarised in **Section 3**, including design changes that are not directly in response to an Additional Information item.

Section 2 details direct responses to Additional Information items.

Given the changes to the proposed development, the proposed project description has been updated as follows:

In summary, the proposed development will consist of the construction of a residential development, which represents Phase 3 of the wider development of the Ballymastone Lands, ranging in height from 2- to 6-storeys, to accommodate 433 no. residential dwellings (including a mix of apartments, duplexes and houses), private amenity space, a crèche (c. 567sq.m), and a community space (c. 216sq.m).

The site will accommodate 323 no. car parking spaces in total (comprised of 296 no. residential spaces, 9 no. spaces for the crèche, 1 no. accessible EV space, 2 no. standard (ducted) accessible spaces, 5 no. standard EV spaces, and 10 no. standard (ducted) spaces), 1,472 total no. bicycle parking spaces, new pedestrian/cycle links, road improvements, storage, services (including water, wastewater, electricity and telecommunications) and plant areas. Landscaping will include communal amenity areas, significant public open space (c. 17% of the overall site), and SuDS features.

Notwithstanding the alterations arising in response to the Request for Additional Information, it is noted that the proposed development has not substantially changed, and thus the principles and compliance with the development plan and all relevant planning policy as outlined in the *Planning Report and Statement of Consistency* prepared by BSM and submitted as part of the planning application, remain unchanged and materially consistent.

Implementation of the design standards contained within the *Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024)* and the *Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025*, including set-back distances, unit size, unit mix etc., has facilitated some revisions to the proposed development that respond to FCC Request for Additional Information. Additional information regarding compliance with these guidelines can be found in **Section 3** of this report.

2 Response to Additional Information Requested by FCC

2.1 Item 1: Revised Plans

“The Planning Authority are not satisfied necessary supporting structures and services are available to serve the proposed development; and the proposed ‘community use’ unit is not considered sufficiently sized given the overall cumulative development of the applicant’s three phases in Ballymastone (total 1,194 dwellings between permitted & proposed). It is considered a more appropriately size community unit is required to adequately serve these future populations, in a more central location within the development site and co-located with public open space. The applicant is requested to submit revised plans to address these concerns; and provide a rationale for the size of the revised community unit based on the project population of the combined three phases.”

In response to Item 1, revised plans have been prepared for the proposed development which includes a revised proposal for the ‘community use’ element. The revised proposal provides for a community hall of c. 216 sq.m in Apartment Block BA09, the size and location of which has been agreed in principle with FCC as appropriate to serve the planned future residents, providing a multi-functional and valuable space for the community to hold events and meetings as required, in the context of the wider delivery of community facilities at the Ballymastone Recreation Hub.

Having considered possible alternative locations, the siting of the proposed community hall remains at the northwestern part of the site (BA09). The proposed location of the community hall places it in a central location relative to the wider development and Donabate town, and in a location that is highly accessible. The proposed siting within BA09 also provides balance in terms of community facilities offerings in the area, when considering the proposed Ballymastone Recreation Hub to the east of the proposed development. With the addition of public open space in this part of the proposed development, the community hall is also co-located with public open space, as per the request.

Please refer to the revised architectural plans and *Architect Design Statement RFI Response*, prepared by MDO Architects, for more detailed information on the revised proposal for the community hall.

2.2 Item 2: Public Open Space

“The Planning Authority have concerns regarding the amenity standard of the proposed public open space provisions given their locations individual sizes, and the dominance of surface water attenuation features. In particular, it is considered the western side of the development lacks an appropriately size public open space area. It is considered revised plans providing for more usable public open space, better integrated into the scheme, are required. The applicant is also requested to address the concerns of the Parks Division relating to landscaping proposals. In revising such public open space provisions, the applicant should be cognisant of the need to provide suitable passive surveillance, more practical, useable open space.”

The Public Open Space (POS) provision across the proposed development has been revisited in light of the above request item, and additionally, public open space has been revised and improved on, in response to adjustments to the proposed scheme layout changes put forward in this Response pack. The MDO Architects *Architectural Design Statement RFI Response to Fingal CoCo*, sets out at Section 2.0 that the application of the *Sustainable & Compact Settlements Guidelines for Planning Authorities* (2024) has allowed for additional public open space to be gained on the western side of the site and throughout the site generally.

In summary, the proposed development now includes a total of 1.91ha of POS, which is provided across 7 no. separate open space areas. This accounts for c. 17% of the net site area, which is in excess of the 15% minimum requirement of the Fingal Development Plan, and an increase from the previously proposed 1.73ha (total increase of 0.18ha). Please refer to **Figure 2-1** which shows the proposed public open space layout and quantum.

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Regarding the concern about the “*dominance of surface water attenuation features*”, 10.9% of the POS is occupied by SuDS features, however this figure includes detention basins which will remain dry for the majority of the time, save for periods of intense rainfall. As such, these areas can be used as kick-about areas whilst dry. Excluding detention basins from the calculation, the area of POS taken up by the remaining SuDS features falls to just 1.68%.

Responding to the concern that the “*western side of the development lacks an appropriately size public open space area*”, an additional area of POS has been included to the west of the site (PP09 c. 1,358 sq.m) providing a large open space area in this location proximate to the community facility and creche. Additionally, SP04 public open space area has increased to c. 1,443 sq.m, both of which increase the available POS to the west of the site.

The revised plans submitted as part of this Response to the Request for Additional Information from FCC, include revised designs for the areas of POS, taking advantage of the proposed layout revisions to create high-quality and usable public open space, catering to a variety of uses, through provision of pathways, kick-about areas, natural play areas, fitness equipment, relaxation areas, teen zone, MUGA play space, etc. The POS areas are suitably overlooked providing passive surveillance and are centrally located facilitating ease of access.

Please refer to the Response documentation prepared by CSR for more detailed information on the public open space strategy. The *Landscape Strategy Addendum* prepared by CSR sets out, at page 7, the key changes to Public Open Space implemented in this response to FCC.

In response to further comments raised by the Parks Division, please refer to ‘Response to Request for Additional Information from FCC’ in the *Landscape Strategy Addendum* prepared by CSR.



Figure 2-1: Public Open Space Layout and Quantum (extracted from drawing no. 19164-2-3121 Public Open Space, Communal Open Space & SuDS prepared by CSR)

2.3 Item 3: EIAR and Landscaping

“The applicant is requested address/clarify the following items and submit a revised EIAR and ‘Landscape Strategy Submission’ to reflect their responses:

- (a) *Pg. 12 ‘Vegetation Retention & Removal Strategy’ of the ‘Landscape Strategy Submission’ indicates part of hedgerow 2 and all of hedgerow 3 are to be removed. However; the total length of hedgerow to be removed as part of clearance works is unclear. The applicant is requested to provide full details of same, including a total figure (in metres) of hedgerow to be removed.*

The *Landscape Strategy Addendum*, landscape drawings, and overall landscape strategy, prepared by CSR has been updated as part of this Response to Request for Additional Information.

The Biodiversity responses required are set out here, and are similarly addressed in the *EIAR Addendum Report* prepared by BSM.

With particular regard to Item 3 (a) the revised landscape documents provide clarity regarding the quantum of hedgerow to be removed. As confirmed in the revised *Landscape Strategy Addendum*, quantities (areas and lengths) of hedgerow and bramble to be removed have been added to the vegetation retention and removal plan (refer to CSR drawing 19164-2-3120-Vegetation Retention and Removal). In total, 100 linear metres of existing hedgerow will be removed and 1,220m² of bramble will be removed. It is to be noted that 537 linear metres of new hedgerow will be planted, resulting in a net increase in hedgerow within the site of 437 linear metres.

Please refer to drawing no. 19164-2-3120 (Vegetation Retention and Removal) prepared by CSR and the *Landscape Strategy Addendum*, also prepared by CSR for further detailed information.

- (b) *Pg. 12 of the ‘Landscape Strategy Submission’ states: ‘The wooded areas along the north-east portion of the site are to be retained entirely, with the exception of some deadwood and bramble undergrowth’. It is not clear is this clearance relates to the mapped WD1 (Mixed) broadleaved woodland habitat within the proposed development or habitat located outside/bordering the proposed development. It is also not clear why deadwood and bramble are to be removed from a woodland when they are a feature of the woodland in which they are located. Modification of WD1 (Mixed) broadleaved woodland habitat has not been assessed within Chapter 8 (Biodiversity) of the EIAR. The applicant is requested to clarify what woodland the removal of deadwood and bramble is associated with, the scale and reasoning for the clearance of undergrowth and to assess the implications on woodland habitat and fauna.*

As confirmed in the *Landscape Strategy Addendum*, the applicant welcomes the opportunity to confirm that the text quoted from the *Landscape Strategy Submission* (at application stage) refers simply to the necessary clearance of only small areas of deadwood and bramble associated with tree group ‘G192’ and ‘W191’ shown on the vegetation retention and removal plan (refer to ‘19164-2-3120-Vegetation Retention and Removal’). In fact, as shown on the drawings prepared by CSR, the vast majority of vegetation in this area is being retained intact (with additional, supplementary planting being provided) and will continue to provide high value to local biodiversity.

The removal of small areas of deadwood and bramble at these two defined locations is required solely to facilitate the creation of useable open space in the Ballalease Woods Park (SP06), and the alignment of the road (as already permitted and under construction as part of Phase 2 development).

The modification of the habitat has been assessed in the EIAR Biodiversity chapter at Section 8.4.2.1 (Habitat Loss and Disturbance) which confirms that in the absence of mitigation, the loss of grassland, scrub and sections of hedgerows and associated habitats is considered to be a permanent, moderate negative impact

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at a local level. This includes the necessary removal of these small areas of deadwood and bramble. Again, as set out in the Landscape Strategy Submission and drawings, the development will include extensive planting of ecologically diverse habitats within the scheme.

As stated on page 21 of the Landscape Strategy Submission *The existing woodland and large trees (including undergrowth) are to be retained and protected. Along the property boundary with Priory Wood, infill hedgerow planting will create a dense hedgerow, preventing access into the woodland. Along the internal edge of the park, strips of meadow grass will act as a buffer / deterrent to accessing the bramble undergrowth of the vegetation edge.*

The conclusions of the EIAR Biodiversity chapter are unchanged as a result of the Response to the Request for Additional Information. In summary there will be no long-term residual impact on biodiversity or on ecological receptors, either within or in the vicinity of the proposed development site or associated with any site designated for nature conservation as a result of the proposed development.

Please refer further to the *Landscape Strategy Addendum prepared by CSR and CSR* drawing no. 19164-2-3120, and the *EIAR Addendum Report* prepared by BSM submitted as part of this Response documentation.

(c) Pg. 31 ‘5 Year Hedgerow Management Plan’ of the ‘Landscape Strategy Submission’ states: ‘The perimeters of the retained hedgerows are to be fenced... it is recommended that a timber post and high tensile wire fence is used’. It is not clear if hedgehogs will be able to access the WD1 (Mixed) broadleaved woodland habitat within the proposed development and woodland bordering the proposed development site once fencing is put in place. The applicant is requested to clarify if fencing of boundary hedgerow will prevent access and movement of fauna such as hedgehog between the proposed development (and retained woodland habitat within the proposed development) and woodland habitat outside and bounding the proposed development site.

As confirmed in the *Landscape Strategy Addendum*, a proposed timber post and high-tensile wire picture and detail has been added to the boundary treatment plan and strategy page of this document. Refer to pg18 of the revised document and CSR drawing 19164-2-3123-*Boundary Treatment Plan*. In addition, estate railings have been added to the proposed hedgerow along the Donabate Distributor Road (DDR). Both the post and high-tensile wire fence and estate railings have ample clearance at ground level for movement of fauna, including hedgehogs, and would not present as an obstacle. In other words, the movement of hedgehogs within the development and within the wider landscape will not be impeded by the proposed development.

(d) Section 8.5.1.7 of the EIAR states: ‘A dark corridor will be maintained along the woodland adjoining Priory Wood. In particular, the occupied bat box (legally protected) will remain unlit’, however, Pg. 18 ‘Proposed Tree Strategy’ of the ‘Landscape Strategy Submission’ indicates that lighting will be located immediately adjacent to the woodland edge of woodland located within the proposed development and bounding the proposed development. The applicant is requested to clarify how a dark corridor will be maintained if operational lighting proposed throughout the proposed development will be located adjacent to the woodland.

As confirmed in the revised *Landscape Strategy Addendum*, and by way of clarification, there will be no lighting located immediately adjacent to the woodland edge as suggested in the above item 3(d) – in fact this was never the case. A 7-metre lighting radius around the lighting columns is shown on the landscape drawings, but this does not indicate light spill – it is simply to denote the actual locations of the poles in accordance with FCC requirements.

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The inclusion of a small number of lighting columns to illuminate the path does not in any way impact on the woodland, or on the bat box. The lighting columns are to be located on the western (woodland-side) of the path, as was always the case – which means the light can shine away from the protected woodland. As is made clear in Section 8.5.1.7 of the EIAR, the dark corridor will be maintained along the woodland adjoining Priory Wood. This is because the lighting, by ENX, has been designed in accordance with all best practice design criteria including the references listed in the EIAR biodiversity chapter, and in accordance with the lighting design requirements of Fingal County Council. It will be possible to retain this dark corridor, because the lighting columns and fittings are designed to avoid any light spill to the rear – they face east, away from the woodland and illuminate the path only. Furthermore, the light fittings have no UV component, and comprise warm, white light.

The revised design of the proposed development has resulted in the footpath and associated lighting columns being moved c.8m east, further away from the woodland. This is beneficial, in that it creates a wider buffer to the woodland, however it has no effect on the conclusions set out in the EIAR Biodiversity chapter including in relation to lighting, specifically that the residual impact of the proposed development is assessed to be long-term, imperceptible and negative. It is not significant.

(e) Pg. 17 'Proposed Soft Landscape Strategy' of the 'Landscape Strategy Submission', indicates new native hedgerow is proposed however, the location and length of hedgerow planting cannot be determined from the mapped information included in the 'Landscape Strategy Submission'. The applicant is requested to clarify if the total length of hedgerow that will be lost as part of the proposed development will be replaced and where it will be located.

As confirmed in the revised *Landscape Strategy Addendum*, the lengths of hedgerow to be removed have been added to the vegetation retention and removal plan (refer to CSR drawing 19164-2-3120-*Vegetation Retention and Removal*). In total, 100 linear metres of existing hedgerow will be removed. It is to be noted that 537 linear metres of new hedgerow will be planted, resulting in a net increase in hedgerow within the site of 437 linear metres.

Please revised landscape drawings and *Landscape Strategy Addendum* prepared by CSR submitted with this Response to additional information request.

(f) Section 8.5.1.1 of the EIAR states: 'The proposed development incorporates a comprehensive landscape design, with biodiversity focussed planting... The planting and long-term management proposed in the Landscape Design Statement will greatly enhance the biodiversity resource on the proposed development site by creating new, pollinator-friendly habitats'. In Section 8.5.1.3 it is stated: 'The planting proposed for the development will wherever possible comprise appropriate mixture of native trees and shrubs, preferably of local provenance'. It is not clear in the 'Landscape Strategy Submission' to what extent native planting and non-native pollinator-friendly species will be used (e.g. will new areas of meadow grass, shrub planting, rain garden, formal hedgerow, native hedgerow planting or woodland planting solely comprise native species) or the percentage of the total make up. It is also not clear from what is mapped (not visible) where native planting is located in relation to retained WD1 (Mixed) broadleaved woodland habitat within the proposed development, woodland adjacent to the proposed development, and retained hedgerows. The applicant is requested to clarify if the total length of the hedgerow planting removed will be replanted with appropriate native species. The applicant is also requested to clarify what groups of proposed planting (e.g. meadow grass, native hedgerow, woodland planting) will include native species, the extent native species will be used (e.g. 100% hedgerow planting, or 50% woodland

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planting) and where these areas of planting are to be located in relation to retained hedgerow and woodland planting. The applicant is also requested to clarify what groups of proposed planting will comprise non-native pollinator friendly planting, where these areas of planting will be located within the proposed development in relation to retained hedgerow and woodland planting.”

As confirmed in the revised *Landscape Strategy Submission*, quantities (areas and lengths) of removed planting have been added to the vegetation retention and removal plan (CSR drawing 9164-2-3120-*Vegetation Retention and Removal*). Proposed new hedgerow planting is shown on the boundary treatment plan (CSR drawing 19164-2-3123-*Boundary Treatment Plan*).

In total, 100 linear metres of existing hedgerow will be removed and 1220m² of bramble will be removed. It is to be noted that 537 linear metres of new hedgerow will be planted, resulting in a net increase in hedgerow within the site of 437 linear metres.

CSR drawing 19164-2-3171-*Planting Strategy* identifies planting locations and species lists.

CSR drawing 19164-2-3172-*Tree Planting Strategy* identifies tree planting type locations and species lists.

The species lists denote which scheduled plants and trees are native, pollinator friendly, or both.

Please refer to pg. 5 of the *Landscape Strategy Addendum* which addresses the queries raised, and summarises the proportions of pollinator friendly species proposed across differing planting areas.

Summary of Conclusions in relation to Biodiversity

With respect to the amendments to the proposed development detailed in the Response to Additional Information request, the clarifications presented in this section, and in the revised *Landscape Strategy Submission*, there are no changes to the conclusions set out in Chapter 8 of the EIAR regarding the potential impact the proposed development will have on biodiversity.

No additional mitigation measures are required beyond those previously detailed in EIAR Chapter 8 (Biodiversity).

The predicted effect on Biodiversity from the overall development remains the same as set out in *Section 8.13 – Conclusion* of the EIAR as originally submitted, as follows:

Overall, although the proposed development is likely to have negative effects on biodiversity at the site level that are moderate, these impacts will be fully mitigated over time to be rendered not significant or imperceptible.

There will be a loss of feeding habitat internally within the site for fauna, and a loss of nesting habitat for birds as a result of the proposed development. However, following mitigation this loss is not significant. Any long-term impact upon bats or on biodiversity receptors in general within the site will not be significant. There will be no loss of bat roosting sites as a result of the proposed development.

The landscape design proposed, which includes the provision of significant replacement and new planting, as well as ecologically sensitive management of the retained woodland resource, will ensure that vegetation will establish over time and the losses will be reduced considerably.

There will be no long-term impact on watercourses as a result of the proposed development.

In summary there will be no long-term residual impact on biodiversity or on ecological receptors, either within or in the vicinity of the proposed development site or associated with any site designated for nature conservation as a result of the proposed development.

Further, there is no change to the cumulative impact assessment as per Chapter 8 of the EIAR.

The conclusion of the Natura Impact Statement (October 2025) is similarly unchanged:

This Natura Impact Statement has considered the potential adverse impacts of a proposal by Glenveagh Living Ltd for a residential development at Ballymastone, Donabate, Co. Dublin on the integrity of European sites. The proposed development is Phase 3 of three phases, the first two of which are permitted and under construction.

This report concludes on the best scientific evidence that it can be clearly demonstrated that no elements of the project will result in any impact on the integrity or Qualifying Interests/Special Conservation Interests of any relevant European site, either on their own or in-combination with other plans or projects, in light of their conservation objectives.

It is considered that this Natura Impact Statement provides sufficient relevant information to allow the Competent Authority (Fingal County Council) to carry out an Appropriate Assessment, and to reach a determination that the proposed development will not affect the integrity of any of the relevant European sites under Article 6 of the Habitats Directive (92/43/EEC) in light of their conservation objectives.

2.4 Item 4: EIAR

“The applicant is request to address/clarify the following items and submit a revised EIAR to reflect their responses:

(a) Chapter 14 (Landscape & Visual) of the EIAR does not satisfactorily address the potential landscape and visual impacts on the St Ita's Hospital and Portrane Demesne ACA and the specific mitigation measures referred to are not clearly defined. The potential landscape and visual effects on the ACA have not been clearly described and it has not been satisfactorily demonstrated the proposed development accords with the policies and objectives of the Fingal Development Plan 2023-2029, including Policy HCAP14 and Objectives DMSO186 and DMSO187; and objectives of the Donabate Local Area Plan, including Landscape Objective 5.8. The applicant is required to submit a revised EIAR, with potential landscape and visual effects on the ACA described and compliance with the relevant policies and objectives demonstrated. Cumulative impacts, specific mitigation measures and residual impacts should be clearly outlined and updated, as appropriate. The revised assessment should have regard to the findings of the cultural heritage, archaeology and architectural heritage assessment and associated interactions.

Please refer to the *Environmental Impact Assessment Report Addendum* prepared by BSM, which includes a revised Chapter 14 (Landscape & Visual). The chapter has been revised to address the potential impacts on the St. Ita's and Portrane Demesne ACA, with specific regard to the above mentioned policies and objectives.

The assessment of the proposed development explicitly takes the ACA into account, and the visual impacts on the ACA are clearly described. Proposed mitigation measures and residual impacts have been revised accordingly, and have regard to the findings of the cultural heritage, archaeology and architectural heritage. Please refer to the *Environmental Impact Assessment Report Addendum* prepared by BSM.

(b) Regarding Chapter 14 (Cultural Heritage, Archaeology & Architectural Heritage) of the EIAR, the distance from the protected structures within the ACA is noted, however, part of the proposed development lies within the ACA and potential impacts on the ACA area as a whole

(including other buildings, i.e., not protected structures, the character, distinctiveness, appearance and setting of the ACA) are not provided. The potential cultural heritage, archaeology and architectural heritage impacts on the St Ita's Hospital and Portrane Demesne ACA have not been assessed satisfactorily and the classification of impacts as 'neutral' is not justified. Furthermore, it has not been satisfactorily demonstrated the proposed development accords with the relevant policies and objectives of the Fingal Development Plan 2023-2029, including Policy HCAP14, Policy HCAP15 and Objectives HCAO24, DMSO186 and DMSO187. The applicant is required to submit a revised EJAR, with potential impacts on the ACA fully assessed, and compliance with the policies and objectives of the Fingal Development Plan 2023-2029 demonstrated. Cumulative impacts, specific mitigation measures and residual impacts should be clearly outlined and updated, as appropriate. The revised assessment should have regard to the findings of the landscape and visual impact assessment and associated interactions.

The above item refers to Chapter 14, however it is taken that this should instead refer to Chapter 15 (Cultural Heritage, Archaeology and Architectural Heritage). A revised Chapter 15 has been prepared, and is included as part of the *Environmental Impact Assessment Addendum* prepared by BSM.

(c) Regarding the non-compliant room identified in Section 16.4.3.1.1 and the non-compliant units identified in Section 16.4.3.2.2 of the EIAR, the compensatory measures referred to for the affected room and units are not clearly defined. Furthermore, the potential daylight/sunlight impacts on the non-compliant room and units are not clearly described prior to mitigation, and the residual impacts following the implementation of compensatory measures are unclear. The impact assessment should be updated to include: - A description of the daylight/sunlight effects on non-compliant rooms/units prior to the implementation of mitigation measures. - Clearly defined compensatory/mitigation measures - A clear description of residual impacts, following the implementation of said mitigation measures.

With regard to the above, Chapter 16 (Microclimate – Daylight & Sunlight) has been fully revised to take account of overall design changes within the proposed development. A revised *Daylight & Sunlight Analysis Report* has also been prepared by IN2, and is included in this Response pack to FCC.

Please refer to both Chapter 16 of the *Environmental Impact Assessment Addendum* prepared by BSM and the revised *Daylight & Sunlight Analysis Report* prepared by IN2.

(d) The applicant is requested to provide an updated Chapter 18 (Traffic & Transportation) of the EIAR which presents a more detailed assessment of impact of construction phase traffic, including a detailed breakdown of construction material deliveries, indication of average and peak no. of HGVs during the construction programme, impact assessment of peak HGVs on junctions along the haul route, no. of site staff commuting to the site, indication of average and peak LGVs and when they occur during the construction programme.

Some sections contained within Chapter 18 (Traffic & Transportation) of the EIAR have been updated and revised as part of this Response documentation by DBFL, which are included in the *Environmental Impact*

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Assessment Report Addendum prepared by BSM, and is further set out here for completeness, to respond to the above item 4(d).

- **Breakdown of construction material deliveries:**
 - Based on a preliminary review of the existing survey data and proposed site levels, we estimate that approximately 85,700 m³ of cut being excavated with all of it being reused on site. The TII Carbon Tool included as part of the application documentation gives a detailed breakdown of construction materials.
- **Indication of average and peak no. of HGVs during the construction programme:**
 - The anticipated total duration of the construction phase is 36 months. Following the completion of the initial site clearance works, the generation for HGV movements during the build period is likely to be evenly spread throughout the day and, as such, will not impact significantly during the peak traffic periods. For this scale of development it is not envisaged that HGV vehicle movements will exceed 4 vehicle movements per hour. This may increase slightly to 6-8 HGV vehicle movements per hour during the busiest period of construction activity.
- **Impact assessment of peak HGVs on junctions along the haul route:**
 - In both the AM and PM peak hours there is anticipated to be 2 HGVs travelling towards the subject site and 2 HGVs travelling away from the subject site. As a result there will be an increase of 4 HGV movements at Junction 1 (Proposed Site Access (N) / DDR), Junction 2 (Proposed Site Access (S) / DDR) and Junction 3 (DDR / New Road). All three of these junctions operate well within capacity with a maximum RFC value of 0.19 (19%), a maximum DoS value of 57% and a maximum DoS value of 56% respectively in the opening year 2028. Therefore it is not anticipated that any of these three junctions will be significantly impacted by the additional HGV movements.
 - The table below (Table 18.6 extracted from the EIAR Addendum Report) illustrates the significance of the impacts before the proposed mitigation activities are applied (as described in Section 18.6 of the EIAR). The impacts of the construction phase prior to mitigation will have slight changes to the surrounding junctions.
 - Considering the site's proximity to the strategic road network and following the implementation of the mitigation measures detailed in the CEMP through an appropriately detailed CTMP, it is concluded that construction traffic will not give rise to any significant traffic concerns or impede the operational performance of the local road network and its surrounding junctions.
- **No. of site staff commuting to the site:**
 - Based on experience of similar developments, a development of this type and scale is anticipated to require an overall average of c. 130 operatives across the programme with a peak of c. 265. On-site employees will generally arrive before 08:00, thus avoiding morning peak hour traffic. These employees will generally depart after 16:00. It should be noted that a large proportion of construction workers would arrive in shared transport.
- **Indication of average and peak LGVs and when they occur during the construction programme:**
 - On average the site will generate, no more than c. 40 two-way vehicle trips during the peak AM and PM periods over the period of the phased construction works. The peak requirement of c. 265 operatives on site is expected to occur over a relatively short period of the programme, potentially generating up to c. 80 two-way vehicle movements in the

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peak AM and PM periods. This peak requirement would be anticipated to be approximately 3 months after project commencement.

Table 18.1 Impact significance – Construction Phase (Prior to Mitigation)
extracted from the EIAR Addendum Report

Junction		Sensitivity	Residual Impact		
No.	Name		Quality	Significance	Duration
1	Proposed Site Access (N) / DDR	Low	Negative	Slight Effects	Short Term
2	Proposed Site Access (S) / DDR	Low	Negative	Slight Effects	Short Term
3	DDR / New Road	Low	Negative	Slight Effects	Short Term
4	Chapel View / Main Street	Low	Negative	Slight Effects	Short Term
5	Hearse Road / Main Street (L2170)	Low	Negative	Slight Effects	Short Term
6	Main Street (L2170) / Portrane Road	Low	Negative	Slight Effects	Short Term
7	Portrane Road / The Links	Low	Negative	Slight Effects	Short Term
8	DDR / Portrane Road	Low	Negative	Slight Effects	Short Term

In general, the impact of the construction period will be short-term in nature and less significant than the operational stage. During the construction of the proposed development, all excavated suitable material will be used for construction and fill activities, where possible and appropriate.

There will be traffic generated from deliveries of construction materials and equipment. It should be pointed out that construction traffic generated during the development works tends to be off-peak. Such trips would generally be spread out over the full working day and are unlikely to be higher than the peak hour predicted for the operational stage. Construction traffic access will be via the DDR that runs from north-south to the east of the proposed development. Construction traffic will continue to enter the site via the DDR for the remaining construction phases of the development with construction traffic diverted to internal, temporary haul roads to access construction areas.

The CTMP will be prepared prior to the commencement of construction work. The CTMP will include details of haul routes and working times. It will be prepared in consultation with Fingal County Council in order to reach full agreement upon the traffic management measures and monitoring measures to be adopted during the entire programme of construction activities on-site.

Having regard to the clarifications and additional information provided above, there are no changes to the overall findings of Section 18.5 Predicted Impacts of the Proposed Development, Section 18.6 Mitigation Measures, or Section 18.7 Residual Impacts as detailed in Section 18.5, Section 18.6 and Section 18.7 respectively of Chapter 18 of the EIAR submitted with the original application.

In conclusion, it is considered that the residual impact post mitigation on the surrounding road network, as a result of the proposed development will be slight. It is concluded that the proposals represent a sustainable and viable approach to development on the subject lands and there are no significant traffic or transportation related reasons that should prevent the granting of planning permission for the proposed residential development.

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Likewise, there are no changes to the Conclusion presented in Chapter 18 (Traffic & Transportation) of the EIAR submitted with the original application.

Please refer to the *Environmental Impact Assessment Report Addendum* prepared by BSM.

(e) Regarding Chapter 13 (Noise & Vibration) of the EIAR, the applicant is requested to review the glazing and ventilation requirements so that the internal noise levels as set out in BS8233:2014 'Guidance on Sound Insulation and Noise Reduction for Buildings, Table 4: Indoor Ambient Noise Levels for Dwellings' are met across all dwellings in the development, including road facing houses and apartments. Revised glazing and ventilation proposals should demonstrate compliance with Table 4 internal noise level requirements for all dwellings, including road facing houses and apartments, and ensures adequate mitigation of road traffic noise impacts. The applicant shall not rely on a 5dB relaxation of the standard.

AWN has responded to this Item 4(e) as per the below, and which is also included in the *EIAR Addendum Report* prepared by BSM for completeness.

The measured noise levels across the development site are categorised as low risk in accordance with ProPg 2017 due to the setback distances from the surrounding road network. The highest measured noise levels were recorded at monitoring location UN01 along the DDR R126 road. This monitoring location is representative of the most exposed residential buildings to road traffic noise within the Proposed Development (Apartment blocks BA07, BA08 and the housing facades overlooking the DDR R126 road). The external noise levels assigned to these most exposed building facades (South East) are also categorised as low in accordance with ProPG 2017.

The assessment has determined that when windows are closed with a standard double glazed configuration to the apartment and housing windows, a good internal noise level in accordance with Table 4 'Indoor ambient noise levels for Dwellings' within BS 8233:2014 Guidance on Sound Insulation and Noise Reduction for Buildings, is achieved within all bedrooms during day and night-time periods. The assessment has confirmed that no specific acoustic glazing is required to achieve this scenario over and above standard double glazing (i.e. an SRI of at least 31 dB Rw).

When windows are open, a reduction in façade sound insulation performance will occur as is standard, however, even under this scenario, the predicted internal ambient noise levels are of the order of 33 dB LAeq within bedrooms along the South East façade of apartment blocks BA07, BA08 and the housing facades overlooking the DDR R126 road at night. This noise level achieves a good to reasonable internal noise environment in accordance with ProPg 2017 and BS 8233:2014 guideline ranges with an open window.

It is noted across the remainder of the development site that 'good' internal night time noise levels are achieved with windows open. Reference to ProPg 2017 notes the following:

"Designing the site layout and the dwellings so that the internal target levels can be achieved with open windows in as many properties as possible demonstrates good acoustic design. Where it is not possible to meet internal target levels with windows open, internal noise levels can be assessed with windows closed, however any façade openings used to provide whole dwelling ventilation (e.g. trickle ventilators) should be assessed in the "open" position and, in this scenario, the internal LAeq target levels should not normally be exceeded."

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“2.34: Where the LPA accepts that there is a justification that the internal target noise levels can only be practically achieved with windows closed, which may be the case in urban areas and at sites adjacent to transportation noise sources, special care must be taken to design the accommodation so that it provides good standards of acoustics, ventilation and thermal comfort without unduly compromising other aspects of the living environment. In such circumstances, internal noise levels can be assessed with windows closed but with any façade openings used to provide “whole dwelling ventilation” in accordance with Building Regulations Approved Document F (e.g. trickle ventilators) in the open position (see Supplementary Document 2). Furthermore, in this scenario the internal LAeq target noise levels should not generally be exceeded.”

There are no guidance documents either at a local level or an international level that AWN is aware of which would support the approach of achieving the ideal internal noise levels in the open window scenario across a full development, especially for buildings close to road traffic sources. It is, therefore, considered suitable to provide building façades with a standard level of sound insulation i.e. standard double glazed units and equivalent ventilation, such that with windows closed but vents opened, a good internal acoustic environment is achieved. It is reiterated again this scenario only applies to the most exposed apartment and housing facades discussed above.

To conclude, the glazing and ventilation requirements for all buildings are not required to incorporate any enhanced acoustic specification over and above those associated with standard units in order to achieve the good internal noise criteria set out within Table 4 of BS 8233 (2019).

(f) The OWMP provided as an appendix to Chapter 19 (Material Assets - Waste) of the EIAR is considered deficient. Tables 4.1 -to-4.3 do not detail how many units of each type of accommodation are included (i.e. the number of 1 beds, 2 beds etc. in each apartment block/duplex block). Based on the proposed duplex unit mix and using BS5906:2005, the estimated waste arising would be 9, 320L (9.32m3), however, Tables 4.2 & 4.3 of the OWMP indicate an estimated waste volume of 2.01 m3 for blocks 'BZ04' and 'BZ25', 0.6m3 for 'BZ10' and 0.86m3 for 'BZ16' totalling 3.47m3, which appears inadequate. Some duplexes may have their own individual bins and may not need to be catered for by the shared waste storage areas but this information is not provided. Additionally, Appendix A of the OWMP is illegible and a revised OWMP include detailed drawings of shared waste storage areas is requested.”

With regard to the above, a revised *Operational Waste Management Plan* has been prepared by AWN in light of revisions to the proposed design and in response to this item (see *Environmental Impact Assessment Report Addendum*, Appendix 19.2).

3 Other Design Changes

In responding to some of the Request for Additional Information items, certain design alterations were required to accommodate the changes. The totality of the changes to the proposed development, as a direct result of these additional information items, or otherwise, are detailed in this section.

3.1 Compliance with Planning Policy and Guidelines

Some design changes proposed as part of this Response documentation respond to the following Guidelines, and the Specific Planning Policy Requirements (SPPRs) therein, in order to address the items raised by FCC, and as such, compliance with these guidelines is outlined in the following sections.

3.1.1 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities

3.1.1.1 SPPR 1 - Separation Distances

The proposed development has been revised at certain locations reducing set back distances between units to 16m in accordance with the guidelines to allow for enhanced public open space delivery, however the majority of units have separation distances in excess of 16m. Please refer to drawing nos. 23010-MDO-PZ4X-XX-DR-A01-050004 (Proposed Site Layout Plan – Planning Zone 4) and 23010-MDO-PZ4X-XX-DR-A01-050005 (Proposed Site Layout Plan – Planning Zone 5) prepared by MDO which show the proposed layout including separation distances.

Please see MDO *Architectural Design Statement RFI Response* for further details, in addition to the revised submitted drawings prepared by MDO in this Response documentation.

3.1.1.2 SPPR 2 – Minimum Private Open Space Standards for Houses

The proposed development has been designed in accordance with the guidelines, with all house units provided with private open space in excess of the minimum quantum allowed for under the guidelines, as outlined in **Table 3-1**. Please refer to drawing nos. 23010-MDO-PZ4X-XX-DR-A01-050004 (Proposed Site Layout Plan – Planning Zone 4) and 23010-MDO-PZ4X-XX-DR-A01-050005 (Proposed Site Layout Plan – Planning Zone 5) which details the relevant dimensions.

Please refer to MDO *Housing Quality Audit RFI Response* for further details.

3.1.1.3 SPPR 3 – Car Parking

SPPR 3 defines 3 no. classifications for car parking maximums, depending on the type of residential development (density and proximity to public transport). This ranges from a maximum of 1 no. space per unit for city centre and urban neighbourhood developments (although it is encouraged to minimise or eliminate entirely), to maximum 1.5 no. spaces per unit for accessible locations, and maximum 2 no. spaces per unit for developments in intermediate or peripheral locations.

A summary of the revised proposed car parking provisions can be found in **Section 3.3** below, however more detailed information can be found in the *Parking Note* prepared by DBFL and submitted as part of the subject Response documentation. The revised proposal has been designed in accordance with SPPR 3, with regard to the development standards outlined in the Development Plan also.

3.1.1.4 SPPR 4 – Cycle Parking

SPPR 4 specifies that where a unit does not have access at ground level to private open space, a minimum standard of 1 no. cycle space per bedroom should apply, with visitor bicycle parking provided also.

Please refer to **Table 3-2** which details the revised proposed cycle parking arrangements relative to both FCC Development Plan standards, and SPPR 4. The revised proposed development includes an excess of cycle parking spaces relative to the guidelines.

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Table 3-1: Revised proposed cycle parking quantum

Land Use		No. Units	FCC Development Plan Standards		Compact Settlement Guidelines		Proposed Cycle Parking Provision	
			Long Stay	Short Stay	Long Stay	Short Stay	Long Stay	Short Stay
Houses (End of terrace)	2 Beds	-	-	-	-	"visitor parking should be provided"	0	-
	3 Beds	84	420		252		420	
	4 Beds	12	72		48		72	
Houses (mid terrace)	2 Beds	86	258	-	172		258	-
	3 Beds	48	240		144		240	
	4 Beds	-	-		-		0	
Apartments	1 Bed	115	230	58	115		117	72
	2 Beds	40	120	20	80		80	
	3 Beds		-	-			-	
Duplexes	1 Bed	2	4	1	2		4	1
	2 Beds	24	72	12	48		72	12
	3 Beds	21	105	11	63		105	11
Creche (Classrooms)		4	4	20	-	-	4	4
Community Hall (Sq.m)		211.5	0	4	-	-		
Sub Total			1,525	126	924	-	1,372	100
Total			1,651		924 + visitors		1,472	

3.1.2 Planning Design Standards for Apartments Guidelines for Planning Authorities, 2025

3.1.2.1 SPPR 2 – Minimum Apartment Floor Area

SPPR 2 of the *Planning Design Standards for Apartments Guidelines for Planning Authorities 2025* ('the apartment guidelines') set a minimum floor area for apartment units, depending on the unit type. The floor areas are outlined in **Table 3-3**.

Table 3-2: Minimum Apartment Floor Areas

Apartment Type	Minimum Floor Area
Studio (1-bed)	32 sq.m
1-bed (2 persons)	45 sq.m
2-bed (3 persons)	63 sq.m
2-bed (4 persons)	73 sq.m
3-bed (4 persons)	76 sq.m
3-bed (5-persons)	90 sq.m

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The revised proposed development includes 155 no. apartment units. Please refer to the *Housing Quality Assessment* prepared by MDO Architects which details the floor areas for each apartment unit, demonstrating compliance with SPPR 2.

3.1.2.2 SPPR 3 – Dual Aspect Ratio

SPPR 3 specifies that a minimum of 25% of apartments within a development should be dual aspect. Please refer to the revised *Daylight and Sunlight Analysis Report* prepared by IN2, which provides a detailed overview of the daylight and sunlight exposures of the units. In summary, 37.4% of the proposed apartment units are dual aspect, in excess of the required minimum. Please also refer to the revised *Architectural Design Statement* and accompanying drawings and reports prepared by MDO for more detailed information.

3.2 Residential Unit Quantum and Mix

Overall, there has been an uplift in the number of proposed units from the application stage submission, to this Response stage, from 398 no. units to 433 no. units, an increase of 35 no. units. This is comprised of an increase from 124 no. apartment units to 155 no. units and an increase from 227 no. houses to 231 no. houses.

This results in a revised unit mix as follows:

- Studio: 9%
- 1-bed: 18%
- 2-bed: 35%
- 3-bed: 35%
- 4-bed: 3%

Please refer to the revised architectural inputs prepared by MDO Architects, particularly the *Architectural Design Statement*, and the *Housing Quality Assessment*, for more information.

The additional apartment units were accommodated through the implementation of more flexible design standards introduced by the *Planning and Design Standards for Apartments Guidelines for Planning Authorities, 2025*, compliance with which is outlined in **Section 3.1.2** of this report.

The additional 4 no. houses were accommodated through the implementation of the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities*, which allowed for adjustments of set-back distances. Compliance with these guidelines is outlined in **Section 3.1.1** of this report, and in the *Housing Quality Assessment* prepared by MDO as part of this Response documentation.

3.3 Car Parking Quantum

Having regard to the change in proposed units from the initial planning application, the proposed parking quantum has also been adjusted accordingly. As part of the revised plans, it is now proposed to provide 323 no. car parking spaces, which are shown in a table in **Figure 3-1** of this report, which is extracted from the *Parking Note* prepared by DBFL included as part of the subject Response documentation.

Additional details are provided in the *Parking Note* prepared by DBFL, however in summary, the revised car parking space quantum is in accordance with the Development Plan and Compact Settlement Guidelines.

Car Park Type	Provision
Houses	231
Apartments	31
Duplexes	34
Residential Sub-Total	296
Creche / Community Hall	9
Accessible Spaces (22 kW EV Charger)	1
Accessible Spaces (Ducted for Future EV Provision)	2
Public EV 22kw Spaces (Live Day 1)	5
Public EV 22kw Spaces (Ducted for Future Provision)	10
Sub-total	27
Total	323

Figure 3-1: Table 1-5 from Parking Note prepared by DBFL showing the revised proposed car parking quantum

3.4 Tenure

It is noted that following communication with FCC, it has been decided to change the tenure type of apartment block BA09 from Part V (social housing) to market tenure, and BA07 from market tenure to Part V (social housing). This change is reflected in the revised *Architectural Design Statement* prepared by MDO. In summary, the tenure mix for the proposed development now proposes a marginal change to the mix with 38% affordable housing, 14% social housing and 48% market tenure. Please refer to the *Part V* architectural pack prepared by MDO architects for this Response documentation, for more detailed information.

3.5 Childcare Provision

Resulting from the minor changes in number and types of units proposed in this Response to Request for Additional Information, the following updated *Childcare Demand Analysis* is provided. This is an update of Section 6 of the previously submitted *Schools Demand and Childcare Facilities Assessment*, prepared by BSM (submitted at application stage).

Childcare Demand Analysis

The 2025 Planning Design Standards for Apartments sets out the following in relation to the provision of childcare facilities:

“Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms”.

The proposed development contains 117 no. studio and 1-bedroom units which equates to c. 27% of the development, which should be discounted while calculating childcare as per the Design Guidelines above. This leaves 316 no. units that would be considered to contribute to a requirement for childcare places required:

$$316 \text{ no. units} / 75 \text{ dwellings} = 4.2 \times 20 \text{ (minimum required spaces)} = \text{c.85 no. childcare places.}$$

The proposed development generates the demand for c. 85 no. childcare places.

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As part of the proposed development a childcare facility of c. 567sq.m is now proposed. Using a range of approximately 4-6sq.m per childcare place, this would provide c. 95 - 142 childcare places.

In addition, the permitted Phase 1 of the Ballymastone masterplan lands provide a c. 909sq.m crèche with a capacity to accommodate c.182 no. of children. This permitted childcare facility meets the demand of c.101 no. childcare spaces generated by the Phase 1 permitted development with the remainder c.81 no. places serving future residential development at Phases 2 and 3 of the Ballymastone masterplan lands.

The permitted Phase 2 of the Ballymastone masterplan lands generated an identified childcare place requirement of c. 83 no. places, which was largely met by the permitted Phase 1 creche. In addition, this proposed Phase 3 creche providing between c. 95-142 no. childcare places (or c.114 no. places at 5sqm/childcare place) meets the identified generated demand of Phase 3 (as set out above at c.85 no. childcare places) and will serve additional demand that may be generated.

It is considered that this childcare facility will meet the demand generated by the development ensuring childcare facilities are available to the existing and new residents.

It is noted that there is a marginal reduction in demand for childcare spaces with the amendments made to unit mix in this Response documentation.

We consider the proposed development to be fully in accordance with Government guidance in relation to the Development Plan and the Childcare Guidelines.

4 Conclusion

This report has been prepared by Brady Shipman Martin on behalf of Glenveagh Living Limited in response to the Request for Additional Information issued by Fingal County Council on 17th December 2025 in respect of the proposed Large-Scale Residential Development (LRD) at Ballymastone, Donabate, Co. Dublin.

The report has provided a consolidated and comprehensive response to each of the 4 no. Additional Information items raised by FCC. In response to Item 1, revised plans have been prepared incorporating a community hall of c. 216 sq.m within Apartment Block BA09, the size and location of which have been agreed in principle with FCC. In response to Item 2, the proposed Public Open Space provision has been revised and increased to a total of 1.91ha across 7 no. separate areas, equating to c. 17% of the net site area and exceeding the 15% minimum requirement. In response to Items 3 and 4, a comprehensive suite of documents, including a EIAR Addendum Report, have been prepared to address FCC's queries relating to landscaping, ecology, cultural heritage, daylight and sunlight, traffic and transportation, and waste management.

In responding to the Request for Additional Information, a number of additional design changes were made to optimise the proposed development. These changes include an increase in the total number of residential units from 398 no. to 433 no., comprising 155 no. apartment units and 231 no. houses, facilitated through compliance with the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)* and the *Planning Design Standards for Apartments Guidelines for Planning Authorities (2025)*.

It is submitted that the proposed development, as revised, represents a high-quality, policy-compliant residential scheme. The development continues to accord with the principles and objectives of the Development Plan, the Donabate LAP (now expired), and all other relevant national and regional planning policy. The changes arising from this Response to Request for Additional Information do not fundamentally alter the nature or scope of the proposed development, and the assessment and conclusions contained within the original *Planning Report and Statement of Consistency* prepared by BSM remain materially consistent. It is respectfully requested that the planning authority proceed to grant permission for the proposed development.

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