

BALLYMASTONE PHASE 3

PLANNING REPORT AND STATEMENT OF CONSISTENCY

Large-Scale Residential Development Stage 3
Planning Application

BSM

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Creative
Urban
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Client:

Glenveagh Living Limited

Date:

21 October 2025

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1 INTRODUCTION

Brady Shipman Martin (BSM) has been instructed by Glenveagh Living Limited (the Applicant) to prepare this Stage 3 Large-Scale Residential Development (LRD) *Planning Report and Statement of Consistency* to submit to Fingal County Council (FCC) regarding a proposed LRD at Ballymastone, Donabate, Co. Dublin.

The subject site (hereafter referred to as 'the site') is located to the east of Donabate, Co. Dublin (see **Figure 1-1**) and consists of Phase 3 of the wider Ballymastone masterplan lands. Phases 1 and 2 have been granted permission and are detailed further in **Section 3.1**.

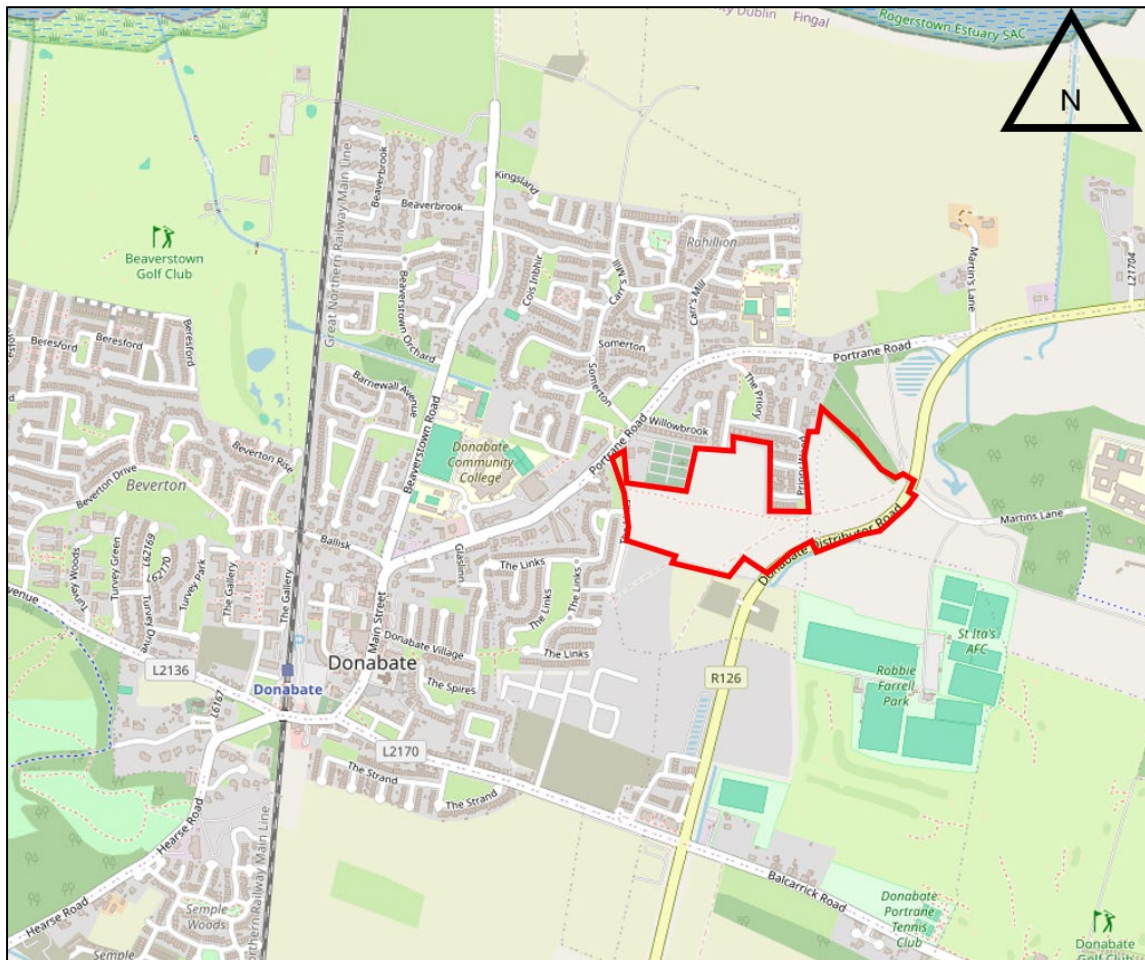


Figure 1-1: Site Location (generally shown in red) Source: OpenStreetMap (annotation added by BSM)

This development is proposed by the Applicant on the basis of a Development Agreement with FCC, as the landowner, to develop the lands. The proposed development complies with the requirements as specified by FCC as part of this procurement process for developing a sustainable mixed tenure residential development, while according with proper planning and sustainable development principles.

The site is identified as Ballymastone in the *Donabate Local Area Plan 2016* (the LAP) which was adopted in March 2016. In March 2021, Councillors approved the extension of the life of the LAP for a further five years, to March 2026. The LAP sets out a detailed strategy for the development of the landbanks zoned for residential development in the Donabate area under the *Fingal Development Plan 2023-2029* (the Development Plan). More detailed information regarding the LAP can be found in **Section 5.4.2**.

The proposed development will provide for 398 no. high-quality units in a mix of residential types, including 1-, 2-, 3-, and 4-bed units in houses, apartments and duplexes. It is also proposed to provide a crèche facility and a community space to accompany the residential elements of the development.

This LRD Application falls under the definition of Large-Scale Residential Development (LRD) as set out under Section 2 of the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 as it is ‘the development of 100 or more houses’. This application has been considered to meet the requirements of a LRD application, as noted in the LRD Opinion issued by FCC on 28th of July 2025.

The site is largely zoned RA ‘Residential Area’ as per the Fingal County Development Plan 2023-2029. As such the use of the site is primarily for residential purposes, which is provided for in the Core Strategy of the Development Plan (See **Section 5.4.1.10** for further detail on land use zoning).

This *Planning Report & Statement of Consistency* prepared by BSM, alongside other relevant reports, accompanies this Stage 3 Large-scale Residential Development Planning Application documentation pack. The wider Design Team for the proposed development is outlined in **Table 1-1**.

Table 1-1: Design Team

Design Team Member	Role
Glenveagh Living Limited (the Applicant)	Applicant
Brady Shipman Martin (BSM)	Planning Consultant (Agent) and Environmental Consultant
MDO Architects (MDO)	Architectural Consultant
DBFL Consulting Engineers (DBFL)	Engineering Consultant
Cunnane Stratton Reynolds Land Planning and Design (CSR)	Landscape Architecture Consultant
IN2 Engineering (IN2)	Daylight and Sunlight Consultant
ENX Engineering (ENX)	Lighting, Utilities and Energy Consultant
John Morris Arboricultural Consultancy	Arboricultural Consultant
Modelworks	Visualisation Consultant
Aramark	Property Management Consultant

The development for which permission is being sought, as per statutory notices, is set out as follows:

“The proposed development will consist of the construction of a residential development, which is a continuation of permitted Ballymastone Phase 1 lands (FCC Ref. LRD0008/S3 & ABP Ref. 315288) and Phase 2 lands (FCC. Ref. LRD0039/S3 & ABP Ref. 320885) and represents Phase 3 of the wider development of the Ballymastone Lands (as identified in the Donabate Local Area Plan 2016 (as extended)), ranging in height from 2- to 6-storeys to accommodate 398 no. residential dwellings (227 no. houses, 47 no. duplex units and 124 no. apartments) and public open space. The site will accommodate 316 total no. car parking spaces, 1,619 total no. cycle parking spaces, pedestrian / cycle links, road connectivity enhancements, storage, services and plant areas. Landscaping will include significant public open space provision and communal amenity areas. The proposed development consists of:

1. *The construction of 398 no. new residential dwellings consisting of 227 no. houses, 47 no. duplex units and 124 no. apartment units set out follows:*
 - *Construction of 227 no. 2-storey houses (81 no. 2-beds, 134 no. 3-beds, 12 no. 4-beds).*
 - *Construction of 47 no. 2- to 3-storey duplex units (2 no. 1-beds, 24 no. 2-beds, 21 no. 3-beds), with balconies on rear elevations.*
 - *Construction of 3 no. apartment blocks, ranging from 3- to 6-storeys in height, with balconies on all elevations, green roofs, and external communal amenity spaces, providing a total of 124 no. apartment units (47 no. 1-beds, 68 no. 2-beds, 9 no. 3-beds);*
2. *Provision of a crèche (c. 646 sq.m) and a community space (c. 100 sq.m) located within the footprint of proposed apartment block to the west of the site;*
3. *Provision of c. 15.3% public open space of the net site area, comprising 3 no. small parks and 4 no. pocket parks which total c. 17,287 sq.m. These parks are generally located centrally within the site providing a series of north-south linear spaces linking to the permitted Ballymastone Phase 2 (FCC Reg. Ref. LRD0039/S3 & ABP Reg. Ref. 320885) with onward connection to the permitted Ballymastone Phase 1 (FCC Reg. Ref. LRD0008/S3 and ABP Reg. Ref. 315288) to the south;*
4. *Provision of a total of 316 no. car parking spaces are provided (combination of in-curtilage and on-street and communal car parking areas);*
5. *Delivery of a total of 1,619 no. cycle spaces (comprising 1,513 no. long-stay/resident spaces and 106 no. short-stay/visitor spaces);*
6. *Provision of vehicular access from The Links road to the west of the site and the Donabate Distributor Road (DDR) to the east of the site;*
7. *Provision of an east-west pedestrian/cycle route is proposed within the site connecting the existing Links Road to the west and DDR to the east, in addition to a connection to the permitted east/west pedestrian/cycle route which forms part of the permitted Ballymastone Phase 2 (FCC. Ref. LRD0039/S3 & ABP Ref. 320885);*
8. *The proposed application includes all site enabling and site development works, infrastructure and utilities, landscaping works and boundary treatments (including at the permitted foul pump station as per FCC Reg. Ref. LRD0039/S3 & ABP Reg. Ref. 320885), solar PV panels, bin and bicycle stores, plant, ESB unit substations, lighting, servicing, signage, surface water attenuation features and all site development works above and below ground.*

An Environmental Impact Assessment Report and a Natura Impact Statement have been prepared in respect of the proposed development."

This report is laid out generally as follows:

1. Introduction;
2. Site Location and Context;
3. Planning History;
4. Pre-Application Consultation;
5. Statement of Consistency;
6. Proposed Development;
7. Part V Requirements;
8. Environmental Considerations; and
9. Conclusion.

2 SITE LOCATION AND CONTEXT

2.1 Site Location

The subject site of c. 11.28ha, is located to the east of Donabate, bounded by the existing residential areas of Willowbrook, The Priory and Priory Wood, and Donabate Burial Ground to the north/northwest, the Donabate Distributor Road (DDR) to the east, permitted Ballymastone Phase 2 (FCC. Ref. LRD0039/S3 & ABP Ref. 320885) to the south, and the Links Road to the west. To the northeast of the site is greenfield land, which forms part of the St. Ita's Hospital Complex Architectural Conservation Area (ACA) under the Fingal Development Plan 2023-2029 (the Development Plan). A portion of the subject site is also within the St. Ita's Hospital Complex ACA.

The lands to the south of the site consist of permitted development for Phases 1 and 2 of the Ballymastone Masterplan (FCC Ref. LRD0008/S3 & LRD0039/S3), which will see the development of a combined c. 796 residential units (Phase 1 of which is currently under construction, with Phase 2 to follow). To the west of the site is the existing residential area, The Links, with Donabate Village Centre further beyond.

Figure 2.1 is an extract of the *Site Location Map Phase 3 1-2500* prepared by MDO.

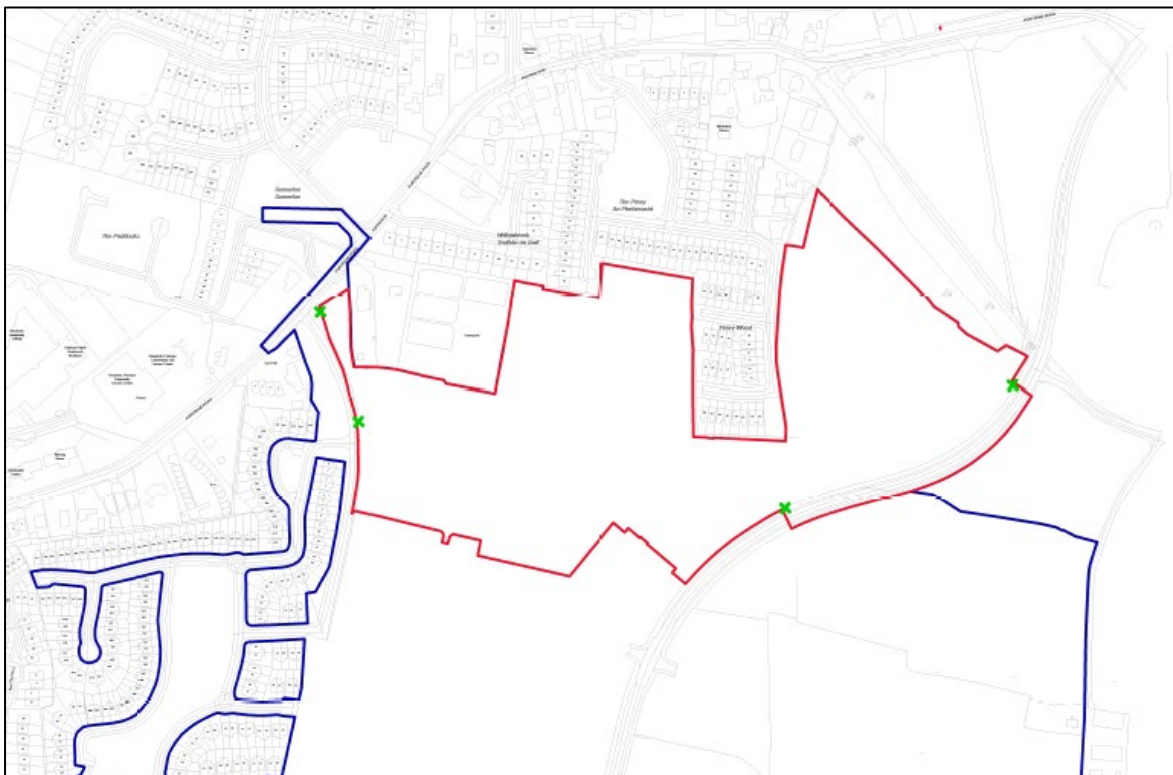


Figure 2-1: Extract from Site Location Map 1-2500 (23010-MDO-ZZZZ-XX-DR-A01-010001)

2.2 Site Context

The site of the proposed development is situated on the eastern edge of Donabate in Co. Dublin, c. 20km north of the Dublin City Centre and c.10km north of Dublin Airport, on the northern edge of the Dublin Metropolitan Area. Dublin City Centre, Swords and Dublin Airport are the primary employment hubs in the wider area, but there are also a number of local industrial and retail parks in the area. **Figure 2-2** shows the location of the proposed development, relative to Dublin City.



Figure 2-2: Location of the Proposed Development, Relative to Dublin City. Source: OpenStreetMap

2.2.1 Transportation

The site is in close proximity to several public transport links including:

- Donabate railway station (c. 1km from the site), which is served by Northern Commuter Rail services;
- 33b bus route (operated by Go-Ahead Ireland, between Portrane and Swords);
- 33t bus route (operated by Go-Ahead Ireland, between Donabate, Portrane, Donabate, and Lusk on college days only);
- 33e bus route (operated by Dublin bus, between Lower Abbey Street and Skerries via Donabate and Portrane, once daily in the morning); and
- 33d bus route (operated by Dublin Bus, between Portrane and St. Stephen's Green/Custom House Quay via the Port Tunnel).

Donabate Railway Station will benefit from future improvements to rail services including DART+ Coastal North, which will see the electrification of existing commuter services, extending the existing DART network, improving frequency. New battery electric DART trainsets are due to enter service in 2026/2027, providing additional capacity before the construction of electrification infrastructure.

Under the BusConnects Dublin network redesign, the 33b will be replaced by the L83 (running between Dublin Airport and Portrane via Swords and Donabate) and the 33d will be replaced by the x83 (running between Portrane and UCD via Donabate and the city centre).

Regarding road connections, the site is located immediately west of the R126 (Donabate Distributor Road), which connects Donabate to the M1 motorway (via a stretch of road also referred to as Hearse Road) at

Junction 4, and also connects to Portrane to the east. The site can also be accessed from The Links road to the west of the site.

More information regarding the accessibility of the site and the transportation options available can be found in the *Traffic and Transportation Assessment* prepared by DBFL.

2.2.2 Donabate Town

Donabate is located on the Donabate peninsula, which is bounded by the Broadmeadow Estuary to the south, Rogerstown Estuary to the north, and the Irish Sea to the east, on the other side of Portrane and Donabate Beach. The wider Donabate area consists of a mix of low-rise residential development, transportation infrastructure and the town centre which features retail and commercial premises, alongside other services and community buildings. The lands surrounding Donabate are largely agricultural/recreational open space.



3 PLANNING HISTORY

There has been relatively little planning activity on the subject site in recent years.

The wider Donabate area has had a significant amount of planning activity, including alongside the site boundaries.

3.1 Ballymastone Lands

3.1.1 FCC Reg. Ref. LRD0039/S3 & ABP Reg. Ref. 320885 (Ballymastone Phase 2)

On 30th April 2024, Glenveagh Living Limited submitted an LRD application to FCC for the development on a site of c. 13.74ha (net area of c. 8.14ha), which represents Phase 2 of the Ballymastone lands. This development is proposed directly south of the subject site.

The development consists of a total of c. 364 no. dwelling units including a mix of 158 no. houses, 124 no. apartments and 82 no. duplexes ranging between 2 – 6 no. storeys. The scheme consists of c. 16.7% of public open space comprising 2 no. small parks and 1 no. pocket parks located along retained hedgerows connecting north and south of the development.

A total number of 278 no. car parking spaces and 1,457 no. cycle parking spaces are provided for residential units. The development also provides for vehicular access to The Links Road, the R126 (DDR) and the permitted Ballymastone Phase 1 (FCC Ref. LRD0008/S3, see **Section 3.1.2**). A north-south pedestrian/cycle route is provided connecting Ballymastone Phase 1 lands to the subject development and the lands to north (subject site for the development of Ballymastone Phase 3).

FCC issued a Notification of Decision to Grant Permission on 28th August 2024, subject to 33 no. conditions, following the submission of Further Information requested from FCC on 21st June 2024. This decision was subject to third-party appeal to An Bord Pleanála (now An Coimisiún Pleanála) from 3 no. appellants: The Links Residents Association, DP Crossroads Committee and Donabate Portrane Community Council. The grounds of the appeals related primarily to:

- Failing to adequately consider the Climate Action Plan 2024 (CAP24);
- Contravention of the Fingal County Development Plan 2023-2029 and the Donabate LAP by means of the proposed density and scale;
- Provision of a link road between New Road and Portrane Road, contravening a policy direction away from car use;
- Lack of detailed assessment of public transport capacity;
- Removal of a modal filter agreed under Phase 1;
- Inadequate assessment of community and social infrastructure;
- Inadequate provision of additional community infrastructure proposed; and
- General concerns related to existing residential amenity.

Having considered the appeals, An Bord Pleanála (ABP) concluded that:

“subject to compliance with the conditions set out below, the proposed development would be consistent with the development objectives and other provisions of both the Fingal Development Plan 2023-2029 and Donabate Local Area Plan (2016) (as extended), would make efficient use of an appropriately zoned site, would positively contribute to an increase in housing stock, would be acceptable in terms of urban design, layout and building height, would be acceptable in terms of pedestrian and traffic safety, and would provide an acceptable form of residential amenity for future occupants. The proposed development would not seriously injure the residential or visual amenities of the area or unduly increase traffic volumes in the area. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.” (page 128 of the Inspector’s Report).

ABP granted permission for the proposed development on 13th January 2025, subject to 30 no. conditions. The decision from ABP was subject to Judicial Review by the DP Crossroads Committee, however this was withdrawn shortly thereafter on 10th April 2025.

3.1.2 FCC Reg. Ref. LRD0008/S3 & ABP Reg. Ref. 315288 (Ballymastone Phase 1)

On 16th September 2022, Glenveagh Living Limited submitted an LRD application to FCC for the development on a site of c. 15.02ha which represents Phase 1 of the Ballymastone lands.

The development consists of a total of c. 432 no. residential dwellings including a mix of 93 no. apartments, 126 no. duplexes and 213 no. houses ranging between 2 – 6 no. storeys. The development also includes a crèche of c. 909sq.m.

The scheme consists of c. 15.6% of public open space comprising 2 no. small parks and 2 no. pocket parks referred to as Baile Uisce Park and Ballisk Park which are located toward the centre of the development.

A total number of 544 no. car parking spaces and 791 no. cycle parking spaces are provided for residential units. The development also includes for vehicular access from New Road via the DDR, upgrade of the existing junction at Portrane Road/ the Links Road (also included as part of this subject application), an east-west cycle pedestrian route connecting the DDR and north of the site and the Ballymastone Recreational and Educational Hub.

FCC granted permission on 11th November 2022, which was subject to 2 no. third-party appeals from Donabate Portrane Community Council and The Links Residents Association. Both appeals were on the grounds of height & density, impact on residential amenity, material contravention of the Development Plan and Donabate LAP, inadequate open space based on population and topics relative to the Environmental Impact Assessment Report (EIAR).

An Bord Pleanála (now An Coimisiún Pleanála) concluded that subject to compliance with conditions, *“the proposed development would not seriously injure the residential or visual amenities of the area or of property in the vicinity, would be acceptable in terms of urban design, height and quantum of development and would be acceptable in terms of traffic and pedestrian safety and convenience.”*

ABP granted permission on 28th March 2023 subject to 27 no. conditions. This decision was subject to Judicial Review, however this was withdrawn shortly thereafter. This Phase 1 permitted development is nearing completion on site.

3.2 Other Lands

3.2.1 FCC Reg. Ref. LRD0064/S3E

On 26th August 2025, Cairn Homes Properties submitted an LRD amendment application to FCC, relating to development permitted under FCC Reg. Ref. LRD0017/S3 (see **Section 3.2.5**).

The proposed amendments relate to part of the main residential development site previously permitted under LRD0017/S3, located north of the Donabate Distributor Road (and to the south of the Ballymastone lands). No changes are proposed to the permitted Nature Park to the south of the road. The amendments include the omission of triplex units, a reduction in duplex units, the introduction of a new back-to-back townhouse type, and a rationalisation of house types. Revised apartment blocks are proposed in generally the same locations as permitted, with Block 2 now six storeys, Blocks 3-5 five storeys, and Blocks 6-7 four storeys in height. Block 4 will provide 65 no. apartments for Independent Living for Older Persons. The Local Centre is revised to retain the same mix of uses (retail, cafés, medical centre and community space) but with an increased gross floor area of 1,430sq.m (previously 730sq.m). Modifications to the public open space network will provide additional areas, increasing total open space from c.3.6ha to c.4.6ha, while Crèche A is repositioned eastwards to facilitate improved access.

Overall, the scheme will deliver 999 no. dwellings, a reduction of 21 no. units compared to the 1,020 no. units permitted, comprising 278 no. apartments (up from 174 no. permitted apartments), 45 no. duplexes (down from 356 no. permitted) and 676 no. houses (up from 490 no., including 182 no. back-to-back townhouses). Car parking provision increases from 902 no. to 922 no. spaces, while bicycle parking increases from 3,013 no. spaces to 3,291 no. spaces. No changes are proposed to the principal access arrangements or main street network, other than minor modifications to cul-de-sac streets.

A decision is due to be issued by FCC by 20th October 2025.

3.2.2 FCC Reg. Ref. F25A/0730E

On 12th August 2025, Grelis Limited submitted a planning application to FCC for the development of a residential scheme of 28 no. units. The scheme provides 9 no. two-storey buildings containing 17 no. one-bedroom apartments and a ground-floor community facility (multi-purpose room with storage), together with a communal garden. The apartments, each with private amenity space and 1 no. parking space, are designed for visually impaired persons in partnership with The National Association of Housing for the Visually Impaired (NAHVI), an Approved Housing Body (AHB). The scheme also includes 11 no. two-storey, three-bedroom terraced houses, each with rear gardens and on-curtilage parking. In addition, 1,018sq.m of open space is provided, along with new internal roads, footpaths, and site access via the existing 'The Paddocks' residential development. The proposal includes all associated landscaping, boundary treatments, drainage, and ancillary works.

On 6th October 2025, FCC issued a decision to refuse planning permission, as the proposal was not compatible with the land use zoning, failed to make efficient use of an existing access road and to provide passive surveillance, and the applicant failed to submit a building lifecycle assessment report.

3.2.3 FCC Reg. Ref. LADP/0001/24 (S179A Proposed Housing Development at New Road, Donabate, Co. Dublin)

FCC intends to carry out a housing development under S179A(5) of the *Planning and Development Act 2000* (as amended) on a c. 4.72ha site at New Road, Donabate, Co. Dublin.

The proposed housing development will include for the construction of 175 no. dwelling units and a single storey crèche of c. 365sq.m. The development will also include 2 no. multi-modal exits onto New Road, 2 no. multi-modal connections to existing and under construction developments to the north and east, 139 no. car parking spaces, cycle parking, bin stores, hard and soft landscaping, PV panels, public and community amenity spaces and all associated site development works.

The proposed development was put to Councillors at a meeting held on 8th April 2024, where the proposal was subject to 5 no. motions proposed by Councillors, summarised as follows:

- Commitment from FCC Chief Executive to identify a location for the provisions of a community, cultural and entertainment space – Proposed by Cllr. A. Henchy, verbal report accepted;
- Examination of the scheme by the Chief Executive with the view to increase community space, alongside the crèche – Proposed by Cllr. A. Henchy, verbal report accepted;
- Deferral of the agenda item to allow for redesign to include a clearly identified site for a dedicated Arts, Cultural and Youth Centre – Proposed by Cllr. P. Mulville, motion fell following roll call vote (5 no. in favour, 24 no. against, 5 no. abstentions);
- Bringing forward of an agreed meeting with the DP Crossroads Committee – Proposed by Cllr. R. O'Donoghue, verbal report accepted; and
- Identification of a suitable council-owned site for an Arts, Cultural and Youth Centre, including scoping of relevant details – Proposed by Cllr. T. O'Leary, verbal report accepted.



The agenda item relating to the proposed development was noted by Councillors, and construction has commenced.

3.2.4 FCC Reg. Ref. F24A/0169

On 29th February 2024, Marshall Yards Development Company Limited applied to FCC for a 7 no. year permission for development on a c. 3.84ha site in Corballis East, Donabate, Co. Dublin.

The proposed development consists of 98 no. residential dwellings, alterations to access road associated with residential development (F22A/0527), internal roads and footpaths, connections to the DDR, 73 no. car parking spaces, bicycle and bin stores, hard and soft landscaping and all associated site development works.

FCC requested Additional Information on 29th February 2024 in relation to design and layout, density, childcare provision and analysis, bicycle storage and facilities, EV parking provision, landscaping, play provision, SuDS, the removal of trees and Natura 2000.

The Applicant responded to said request, which was deemed Significant Further Information, which was then subject to a Clarification of Additional Information on 16th October 2024 regarding matters related to the submitted NIS. FCC then issued a Notification of Decision to Grant Permission on 19th December 2024, with a Final Grant of Permission issued on 28th January 2025.

3.2.5 FCC Reg. Ref. LRD0017/S3

On 12th September 2023, Aledo Donabate Ltd submitted an LRD application to FCC for development on a site of c. 41.9ha directly east of the Dublin-Belfast railway line and south of Donabate. A permission duration of 10-years was requested.

The development consists of a total of 1,020 no. residential dwellings ranging from 1-6 no. storeys in height arranged in 7 no. blocks. The development also includes 2 no. childcare facilities with capacity for c. 237 no. children. 3 no. retail units, 2 no. café units, a community use unit, and a medical centre located at the proposed Local Centre within the site.

As part of the development, an extensive area of open space is provided including the provision of Corballis Nature Park (c. 13ha) to serve the wider Corballis lands including a cycle/ pedestrian connection from the DDR to Corballis Cottages Road.

A total of 902 no. car parking spaces and 3,013 no. cycle parking spaces are provided. Main vehicular access to the site is via 2 no. existing junctions on the DDR and a new vehicular entrance north-east of New Road.

The development also includes for an omission and decommissioning of a temporary pump station (FCC Reg. Ref. F20A/0204 / ABP Reg. Ref. 308446) and all other site development works.

FCC requested Further Information on 6th November 2023 related to matters concerning; the CEMP, EIA mitigation measures and various addenda, the NIS, and archaeology. The applicant responded to this request on 21st December 2023, with FCC issuing a Final Grant on 4th April 2024, which is valid for a period of 10-years from the date of the Final Grant.

3.2.6 FCC Reg. Ref. F23A/0134

St Patrick's GAA Clubhouse Donabate applied for permission for development at St Patrick's GAA, Donabate on 3rd April 2023. The development consists of the extension to the existing single storey clubhouse to provide for additional dressing rooms, shower rooms, toilets, meeting rooms, sports hall, gymnasium, physio room, club offices, club shop and storage at ground and first floor level.

FCC granted planning permission on 5th July 2023 subject to 8 no. conditions.



3.2.7 FCC Reg. Ref. F22A/0686

On 12th December 2022, Cairn Homes Properties Ltd submitted an application to FCC seeking consent for alterations to permitted development under FCC Reg. Ref. F20A/0510 and ABP Reg. Ref. 311447 (see **Section 3.2.13**) consisting of relocation of a permitted ESB substation, rearrangement of 3 no. car parking bays, an increase of the parapet height of apartment block roof level by c. 0.155m and the provision of a lift overrun shaft, revisions to the ground floor level apartments to include private patios in place of balconies, fenestration alterations, minor revisions to roof pitch and levels for all house types permitted, revisions to permitted materials and fenestration on some house types, and any ancillary works required to facilitate said alterations.

FCC granted permission on 22nd March 2023, subject to 7 no. conditions. The expiration date of the parent permission (FCC Reg. Ref. F20A/0510 and ABP Reg. Ref. 311447) was not extended. Construction has largely been completed.

3.2.8 FCC Reg. Ref. F22A/0527

On 29th May 2023, Glenveagh Homes Limited submitted a planning application to FCC for development on a site of c. 3.50ha on lands in Corballis East, Donabate, Co. Dublin.

The development comprises 96 no. residential dwellings and a two-storey crèche, vehicular access from the DDR, internal roads and footpaths, 166 no. car parking spaces, bin and cycle stores, hard and soft landscaping and all associated site development works.

FCC requested Additional Information 24th November 2022, which was deemed significant on 23rd February 2022. On 4th April 2023, FCC sought a Clarification on Further Information and allowed for additional time up and until 31st August 2023 for a response. FCC granted planning permission subject to 39 no. conditions on 30th August 2023.

3.2.9 FCC Reg. Ref. F22A/0165

On 1st July 2022, Glenveagh Homes Limited lodged a planning application to FCC on a site bounded to the north-east by Semple Woods (FCC Reg. Ref. F21A/0056), to the south by the DDR, to the West by Hearse Road with a total site area of c. 3.22ha.

The development consists of amendments to permitted residential development granted under FCC Reg. Ref. F21A/0113 (see **Section 3.2.10**) resulting in an increase of units from 65 no. units to 69 no. units, 6 no. car parking spaces, amendments to private and public open spaces, changes in house type and all associated development works.

FCC granted planning permission on 24th August 2022, with construction largely completed.

3.2.10 FCC Reg. Ref. F21A/0113 & ABP Reg. Ref. 3124858

On 11th November 2021, Glenveagh Homes Limited submitted an application for development on a site of c. 2.48ha bounded by Hearse Road to the west/northwest, Semple Woods to the north (existing residential development) and the DDR to the south.

The development consists of an extension to the Semple Woods housing development to the north of the site, comprising of 76 no. residential dwellings (a mix of two-storey houses and duplex units), vehicular access from Semple Woods, 130 no. car parking spaces, bicycle parking, bin storage, boundary treatment, lighting and other associated ancillary works.

FCC requested Additional Information on 26th April 2021 relating to matters regarding parks and green infrastructure, density, linkages and connectivity, design, transport infrastructure, storm water management, childcare, visual impact, conservation, noise and dust management, and construction access.



The Further Information submitted by the applicant on 6th August 2021 was deemed significant by FCC, with revised notices received on 12th August 2021. A Clarification of Further Information was sought by FCC on 5th October 2021, relating to parks and open space, links to Hearse Road, parking and transport matters, silt management, childcare, and overshadowing.

FCC subsequently issued a Notification of Decision to Grant Permission for the development on 8th December 2021, subject to 32 no. conditions, which ordered the omission of several units, permitting just 65 no. units in total.

The decision from FCC was appealed by the applicant to ABP, however this appeal was withdrawn, resulting in a Final Grant of permission being issued on 2nd February 2022.

3.2.11 ABP Reg. Ref. 311059

Aledo Donabate Limited submitted an SHD (Strategic Housing Development) application to ABP on 9th August 2021 for development on lands at Corballis East, Donabate, Dublin, to the south of the subject site.

The development consisted of 1,365 no. residential units consisting of 346 no. houses and 1,019 no. apartments alongside a crèche and associated site development works.

The application was subject to an Oral Hearing with ABP on 14th December 2021 in order to address the following issues:

9. Clarification and elaboration in respect of the proposed development's interaction with the Belfast Railway line and its existing and proposed new embankments following any expansion of the rail line to accommodate the proposed DART extension.
10. The potential for visual impacts and the requirement for more detailed analysis and justification for the proposed design choice of
11. the apartments to southwest of the site, where the visibility of proposed apartment blocks 6 and 8 and the top storey to blocks 4 and 5 are particularly apparent, and which may potentially have an adverse impact on protected views as outlined in the Fingal Development Plan

ABP granted permission on 10th November 2022. Alternative proposals have since been granted for the subject site under LRD0017/S3 (see **Section 3.2.5**).

3.2.12 FCC Reg. Ref. PARTXI/004/21

On 6th July 2021, FCC Planning and Strategic Infrastructure Department submitted a Part 8 application for consideration to the Planning Department for the development of the Ballymastone Recreational Hub, located on the eastern side of the DDR. The proposed development consists of:

- 1 no. 8-lane 400m all weather athletics track;
- 1 no. grass sports pitch (100m x 64m);
- 1 no. all weather sports pitch (150m x 106m);
- A combined public skatepark and playground;
- A car park (191 no. spaces) and coach park (6 no. spaces);
- 300 no. bicycle parking spaces;
- 3 no. bleacher structures; and
- Associated boundary treatments, landscaping, lighting and site services.

Planning permission was granted on 13th September 2021.

3.2.13 FCC Reg. Ref. F20A/0510 & ABP Reg. Ref. 311447

On 12th October 2020, Cairn Homes Properties Ltd submitted an application to FCC seeking consent for development at a site of c. 1.98ha, bounded by New Road to the south and the DDR to the east. The



proposed development consisted of 36 no. houses, 28 no. apartment/duplex units, 158 no. car parking spaces, 72 no. bicycle parking spaces, 1,800sq.m of open space including a playground, vehicular access from New Road, and all associated site and ancillary works. Temporary permission was also sought for a period of 5 years for 3 no. advertising signs.

On 4th December 2020, FCC requested Additional Information concerning the following matters: revised design of the apartment/duplex blocks, revised layout and tree planting, archaeological assessment, road and access layout, consideration for a proposed foul water pumping station, groundwater management, landscaping and SuDS, open space, and an acoustic assessment.

The applicant furnished FCC with Additional Information on 1st April 2021, which was subject to a Clarification of Additional Information request from FCC on 28th April 2021, relating to cycle parking and footpaths, design of the apartment/duplex blocks, and clarification of land ownership.

The response from the applicant to the request for Clarification of Additional Information (submitted on 15th July 2021) was deemed significant on 27th July 2021, and thus revised notices were received on 30th July 2021. FCC subsequently issued a Notification of Decision to grant permission on 26th August 2021, subject to 28 no. conditions.

The decision from FCC was subject to a third-party appeal by David Fletcher (Donabate Portrane Community Council) relating to matters *inter alia*: flooding, surface water management, public transport capacity, deficit of infrastructure (schools, childcare, ESB capacity, etc), quality of design, loss of hedgerows, and concerns regarding the AA screening.

ABP granted permission for the subject application subject to 23 no. revised conditions, on 14th February 2022. Construction has largely been completed on this site, subject to amendments made under FCC Reg. Ref. F22A/0686 (see **Section 3.2.7**).

3.2.14 FCC Reg. Ref. F17A/0373 & ABP Reg. Ref. 249206

On 30th July 2017, Tilberry Limited applied to FCC for development on lands at New Road, Ballisk, Donabate, Co. Dublin.

The proposed development comprises 151 no. residential units and 1 no. crèche/ childcare facility, 2 no. new pedestrian and vehicular access onto New Road with road upgrade works, private and public open space including 1 no. playground and all associated site development works. Planning permission was also sought for a temporary foul pump station which will be decommissioned following completion of the permanent pumping station.

FCC granted planning permission on 23rd August 2017, and the decision was later subject to third-party appeal to ABP. ABP granted permission for the development on 17th April 2019.

Alternative proposals for this site have since been granted permission under FCC Reg. Ref. LADP/0001/24 (See **Section 3.2.3**).



4 PRE-APPLICATION CONSULTATION

4.1 Section 247 Meeting (LRD Stage 1)

Both the context and approach to the application site and the emerging design rationale for the proposed development, have been subject to considerable consultation with the wider Fingal Team as part of the Development Agreement Process and with the FCC Planning Department under Section 247.

A preliminary S247 meeting was held on 2nd July 2024 with Fingal County Council, following which the project was temporarily paused.

Subsequently, the Stage 1 pre-application meeting for the proposed development was held on 24th March 2025 via Microsoft Teams. Attendees at the meeting are detailed in **Table 4-1**.

Table 4-1: Section 247 Meeting Attendees

Fingal County Council	Applicant and Design Team
Patrick O'Connor (Planning)	Justin Farrelly (Glenveagh Living Ltd)
Shane Campbell (Planning)	Anthony Perrin (Glenveagh Living Ltd)
Alan Fenton (Planning)	Kate Monaghan (MDO)
Colm Kelly (Planning)	Caroline Flynn (MDO)
Shauna Hughes (Housing)	Robert McCauley (MDO)
Phillip Grobler (Water Services)	Pauline Byrne (BSM)
Gemma Carr (Parks)	Tina Varela (CSR)
James Johnson (Transport)	Nikita Mane Awaghade (CSR)
Laura Barton (LRD Administration)	Brendan Manning (DBFL)
Donal Moriarty	Brendan Curran (DBFL)
Ellen Giffney	Donal Commane (ENX)

In summary, the meeting was positive in nature, with FCC providing commentary on matters related to transport, water and drainage, parks and landscaping, design, and general planning matters. The commentary provided by FCC was then considered and taken into account when preparing the LRD Opinion Meeting Request, and the subject LRD planning application.

4.2 Section 32B LRD Opinion Meeting (LRD Stage 2)

On 30th June 2025, the Stage 2 LRD Opinion Meeting was held between the Design Team and a team from FCC, via Microsoft Teams.

Table 4-2: Section 32B Meeting Attendees

Fingal County Council	Applicant and Design Team
Alan Fenton (Planning Section)	Justin Farrelly (Glenveagh Living Ltd)
Patrick O'Connor (Planning Section)	Anthony Perrin (Glenveagh Living Ltd)
Donal Moriarty (Planning Section)	Kate Monaghan (MDO)

Fingal County Council	Applicant and Design Team
Mark Lenehan (Planning Section)	Robert McCauley (MDO)
Ellen Gifney (Parks Section)	Pauline Byrne (BSM)
Gemma Carr (Parks Section)	Shane Duffy (BSM)
Shauna Hughes (Housing Section)	Tina Varela (CSR)
Cian Pigott (Engineering Section)	Nikita Mane Awaghade (CSR)
Philip Grobler (Water and Drainage Section)	Brendan Manning (DBFL)
Shane Comaskey (Engineering / Transport Section)	Brendan Curran (DBFL)
	Aimee Dunne (DBFL)
	Declan O’Leary (CSR)

In summary, the meeting was positive, with FCC providing feedback and comments orally, which were to be followed by a formal LRD opinion. Matters discussed include:

- Planting and existing trees;
- Public open space;
- Site boundaries;
- Details regarding the pump station;
- Interaction with existing residential neighbourhoods and permitted phases;
- SuDS; and
- Phasing.

Detailed feedback and opinions regarding the proposed development as outlined in the meeting request documentation was provided in a written LRD opinion. BSM have prepared a *Response to LRD Opinion Report* which directly addresses each item individually, referring to relevant documentation. Please refer to the *Response to LRD Opinion Report* prepared by BSM for more information.



5 STATEMENT OF CONSISTENCY

5.1 Consistency with National & Regional Planning Policy

The key provisions of national (including relevant Section 28 guidelines) and regional planning policy as it relates to the proposed development is set out in the following sections. The key policy and guidance documents of relevance to the proposed development are as follows:

- Housing For All – A New Housing Plan for Ireland (2021);
- Project Ireland 2040 - National Planning Framework (First Revision);
- Eastern and Midland Regional Assembly - Regional Spatial & Economic Strategy 2019-2031 (RSES) (2019);
- Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024);
- Planning Design Standards for Apartments: Guidelines for Planning Authorities, 2025
- Urban Development and Building Heights Guidelines for Planning Authorities (December 2018);
- Design Manual for Urban Roads and Streets (DMURS) (2019);
- Guidelines for Planning Authorities on Childcare Facilities (2001);
- Transport Strategy for Greater Dublin Area 2022-2042;
- Guidelines for Planning Authorities on 'The Planning System and Flood Risk Management (2009);
- Birds and Habitats Directive – Appropriate Assessment (92/43/EEC)
- EIA Directive (2014/52/EU); and
- Climate Action Plan 2025.

5.2 National Planning Policy

5.2.1 Project Ireland 2040 – National Planning Framework (First Revision)

Project Ireland 2040 contains two key plans: the National Planning Framework (NPF) and the National Development Plan Framework (NDP) which in tandem seek to achieve ten strategic outcomes including:

1. Compact Growth;
12. Enhanced Regional Accessibility;
13. Strengthen Rural Economies and Communities;
14. Sustainable Mobility;
15. A Strong Economy, supported by Enterprise, Innovation and Skills;
16. High-Quality International Connectivity;
17. Enhanced Amenity and Heritage;
18. Transition to a Low Carbon and Climate Resilient Society;
19. Sustainable Management of Water and other Environmental Resources; and
20. Access to Quality Childcare, Education and Health Services.

In April 2025, the Houses of the Oireachtas approved the adoption of the First Revision of the National Planning Framework which builds on the NPF which was initially drafted in 2018, to reflect the changing needs of Ireland in the time that has elapsed since.

One of the key objectives of the revised NPF relates to compact growth. The plan seeks to achieve development in strategic areas in the existing residential footprint of cities, towns and villages in order to achieve effective density and consolidation, rather than more sprawl of urban development. In this regard, the following National Policy Objectives (NPOs) have been included:



NPO 8: *“Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.”*

NPO 9: *“Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints and ensure compact and sequential patterns of growth.”*

NPO 13: *“Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.”*

NPO 20: *“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”*

NPO 42: *“To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.”*

The proposed development seeks to provide sustainable growth in housing within the footprint of Donabate, utilising appropriate compact development, whilst providing high-quality homes, of a suitable mix of tenure and household size.

The NPF requires homes to be constructed in places that can support sustainable development. This includes places that are accessible to a range of local services, can encourage the use of public transport, walking and cycling, and help tackle climate change. The proposed development is responding to the existing strong demand in the area and in location that is highly accessible to both existing local facilities and public transport routes to the City Centre.

The proposed project is consistent with the objectives of the NPF in that it will deliver a high-quality residential development within the Dublin Metropolitan area, in proximity to public transport services providing access to Dublin City.

While the proposed development will be delivered on a greenfield site directly adjacent to an existing settlement, it is situated on lands that have been zoned by FCC for residential development of this nature. It will provide a mix of units in terms of tenure and housing typology, at a density permissible at Donabate, and in accordance with the NPF NPOs.

5.2.2 Planning Design Standards for Apartments: Guidelines for Planning Authorities, 2025

In July 2025, the Minister for Housing, Local Government and Heritage issued the *Planning Design Standards for Apartments: Guidelines for Planning Authorities, 2025* (‘the design standards’) under Section 28 of the Planning and Development Act 2000, as amended. The design standards supersede the previous guidelines in relation to apartment design; *Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2022 (updated July 2023)*, which are now revoked.

The Guidelines are cognisant of the latest updates to the NPF and increasing pressure to accelerate the delivery of housing. The matters dealt with in the guidelines include apartment mix, internal space standards, dual aspect ratios, floor to ceiling heights, apartment to stair/lift core ratios, storage space, and amenity space.

The publication of the design standards occurred when the design of the subject proposed development was substantially progressed. The new design standards generally provide more flexibility for the development of apartments, and the proposed scheme has been designed such that it meets the previous



guidelines that have since been revoked, and thus exceeds the standards set by the current design standards adopted in 2025.

Please refer to the *Housing Quality Audit* prepared by MDO for a detailed demonstration of the compliance of the proposed units with the relevant guidelines, design standards and SPPrs as appropriate.

Further details of the proposed development in accordance with the design standards are set out in **Section 6** of this Report.

5.2.3 Urban Development and Building Heights, Guidelines for Planning Authorities (December 2018)

The Urban Development & Building Height Guidelines for Planning Authorities (the Guidelines) identify that as reflected in *“the National Planning Framework that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas”* and that *“securing compact and sustainable urban growth means focusing on reusing previously developed ‘brownfield’ land, building up infill sites (which may not have been built on before) and either reusing or redeveloping existing sites and buildings, in well serviced urban locations, particularly those served by good public transport and supporting services, including employment opportunities”*.

The Guidelines reference NPO 13 (from the NPF), which states that:

“...in urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected” (page 5).

It recognises that in meeting the challenge set out above new approaches to urban planning and development are required and that securing an effective mix of uses within urban centres is critical. To bring about this increased density and increased residential development in urban centres the Guidelines state that *“significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels”* (page 5).

As identified in the Guidelines:

“newer housing developments outside city and town centres and inner suburbs, i.e. the suburban edges of towns and cities, typically now include town-houses (2-3 storeys), duplexes (3-4 storeys) and apartments (4 storeys upwards). Such developments deliver medium densities, in the range of 35-50 dwellings per hectare net. Such developments also address the need for more 1 and 2 bedroom units in line with wider demographic and household formation trends, while at the same time providing for the larger 3, 4 or more bedroom homes across a variety of building typology and tenure options, enabling households to meet changing accommodation requirements over longer periods of time without necessitating relocation”.

The Guidelines identify that development proposals for more mixed heights can provide for a more attractive streetscape and should move away from 2-storey dominated approaches. The proposed development includes a range of heights from 2- to 6-storeys, focusing denser development along the DDR and to the west of the site, which is in closer proximity to Donabate Railway Station. Please refer to the *Architectural Design Statement* prepared by MDO for more detailed information regarding height, and also **Section 6.3** of this report.



5.2.4 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

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

Since the publication of the Residential Density Guidelines 1999 and subsequent 2009 guidelines, planning authorities have been recommended to promote increased residential densities at appropriate locations. The Guidelines noted that:

“...given the NPF priorities for compact growth [...], the Government considers that it is necessary to expand on the number of density bands contained in the 2009 Guidelines in order to ensure that densities are efficient while, at the same time, tailored to settlement context.” (page 16).

Within the Guidelines, area and density ranges are set out considering factors such as proximity to high-frequency public transport, to maximise the return on public transport investment. The Guidelines further identify the importance of delivering higher densities based on site accessibility. The density of the proposed development reflects the overall size of the site, and the proximity to the railway station, which facilitates denser development. The portion of the site that is within 1km of the railway station has a density of c. 42.5 dwellings per hectare (dph), and the overall site has a density of c.35.3 dph.

Donabate is a Metropolitan Town, being within the Dublin Metropolitan Area, with a population in excess of 1,500 no. people. The subject site can be considered ‘Suburban/Urban Extension’ as per these Guidelines, and as such, densities of 35-50 dph should be applied.

The Guidelines reinforce that the planning authority “*is required to have regard to the policies and objective of the Guidelines and to apply the specific planning policy requirements*” (page 10). Alignment with the following 4 no. SPPRs in relation to separation distances (SPPR 1), minimum private open space standards for houses (SPPR 2), car parking (SPPR 3) and cycle parking and storage (SPPR 4) are demonstrated in **Section 6** of this Report.

For further details on site accessibility with reference to these Guidelines, please refer to the *Traffic and Transportation Assessment* (Section 3.5) prepared by DBFL.

5.2.5 Urban Design Manual – A Best Practice Guide (2009)

The *Urban Design Manual – A Best Practice Guide* (2009) (the UDM) sets out a series of 12 no. criteria which it recommends should be used in the assessment of planning applications. The *Architectural Design Statement* prepared by MDO and submitted as part of the documentation, sets out how the proposed scheme responds to these criteria in detail.

Neighbourhood:

- Context – How does the development respond to its surroundings?
- Connections – How well connected is the new neighbourhood?
- Inclusivity – How easily can people use and access the development?
- Variety – How does the development promote a good mix of activities?

Site:

- Efficiency – How does the development make appropriate use of resources, including land?
- Distinctiveness – How do the proposals create a sense of place?
- Layout – How does the proposal create people friendly streets and spaces?



- Public Realm – How safe, secure and enjoyable are the public areas?

Home:

- Adaptability – How will the buildings cope with change?
- Privacy & Amenity – How does the scheme provide a decent standard of amenity?
- Parking – How will the parking be secure and attractive?
- Detailed Design – How well thought is the building and landscape design?

The criteria above have been given due consideration in the design of the proposed development. A response to the UDM criteria and their relationship to the proposed development is set out in the *Architectural Design Statement* prepared by MDO.

5.2.6 Design Manual for Urban Roads and Streets (2019)

The *Design Manual for Urban Roads and Streets* (DMURS) was adopted by the Department of Transport and the Department of Environment (now Housing) in 2013, and updated in 2019. It sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas.

It is noted that the DMURS has been taken into account in the development of the Donabate LAP. With specific regard to lands at Ballymastone, the LAP states that:

“The Ballymastone lands will evolve to connect coherently to existing and proposed road infrastructure in the vicinity. Connections will be required between residential areas and the proposed Educational and Recreational Campus including a new Campus Link Road from the west. Street networks that are orthogonal in nature are the most effective in terms of permeability and legibility. Important strategic pedestrian and cycleway connections will be necessary from Ballymastone eastwards to St. Ita’s Demesne and westwards to the Spires estate to maximise permeability to the Village.” (p. 28).

The LAP further details how residential streets (local streets), transition zones (areas that slow vehicles entering residential areas), shared surfaces, pedestrian crossings, car and bicycle parking, set-down areas and cycle infrastructure should be delivered across the development lands (pp. 28-31).

Objective 3.5 of the LAP is to *“Seek the implementation of the DMURS to facilitate good quality permeability and places/public realm”* (p. 31).

The street layout of the proposed project is consistent with DMURS and the overall design approach.

The *DMURS Design Statement* prepared by DBFL is submitted as part of this LRD application under separate cover, and provides further detail in respect of the compliance of the proposed project with DMURS.

5.2.7 Guidelines for Planning Authorities on Childcare Facilities (2001)

The *Guidelines for Planning Authorities on Childcare Facilities* (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing developments where planning authorities should require the provision of a minimum of one childcare facility with 20 no. places for each 75 no. dwellings.

Childcare provision across the wider Ballymastone development will be facilitated within the childcare facility provided on Phase 1 lands to the south of the proposed development (FCC Ref. LRD0008/S3 & ABP Ref. 315288) and within the childcare facility proposed. This is in addition to existing and proposed childcare services within the surrounding area.



As such it is considered that the permitted crèche under Phase 1, proposed crèche under this subject LRD planning application and existing and proposed childcare services within the area will meet the demand for childcare facilities over the wider Ballymastone site.

This is further set out in the *Schools Demand and Childcare Facilities Assessment* prepared by BSM, which is submitted as part of this LRD application.

5.2.8 Transport Strategy for Greater Dublin Area 2022-2042

The *Transport Strategy for the Greater Dublin Area 2022-2042*, as prepared by the National Transport Authority (NTA), has arisen from a review of the original 2016 strategy and provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA) over the next two decades. It also provides a transport planning policy around which statutory agencies involved in land use planning, environmental protection, and delivery of other infrastructure such as housing, water and power, can align their investment priorities. It is, therefore, an essential component, along with investment programmes in other sectors, for the orderly development of the Greater Dublin Area over the next 20 years.

The Strategy identifies the challenges for transport in the GDA as being:

- An assumed return to sustained economic growth;
- Substantial population growth;
- Full employment;
- That no one is excluded from society, by virtue of the design and layout of transport infrastructure and services or by the cost of public transport use; and
- That the environment in the GDA is protected and enhanced.

It is considered that since the publication of the Strategy in 2016, economic and population growth has continued to substantially increase and as such the objective of the plan are critical to ensuring a functional GDA region.

Donabate is located within Corridor A which is further divided into 3 segments and is located in the 'Outer Metropolitan A2' segment. The Transport Strategy seeks to provide for a significantly increased capacity transport network along this route. The primary aim for providing increased capacity along corridor A is to provide a long-term public transport solution connecting Dublin City Centre, Dublin Airport and Swords through Metro North (now known as Metrolink), 2 no. high-capacity rail lines and Quality Bus Corridors (QBC).

As such the proposed development is consistent with the objectives of the GDA Transport Strategy by developing residential development in proximity to existing public transport networks with proposed plans for expansion thereby reducing the requirement on the car and encouraging a shift to more sustainable transport methods.

5.2.9 Guidelines for Planning Authorities on The Planning System and Flood Risk Management (2009)

The *Guidelines for Planning Authorities on The Planning System and Flood Risk Management* introduce comprehensive mechanisms for the incorporation of flood risk identification and management into the planning process. In accordance with these guidelines, a *Site-Specific Flood Risk Assessment* (SSFRA) has been prepared for the current LRD application by DBFL. The primary objective of the SSFRA is to inform a site design that can manage the impacts of surface water across the site without negatively impacting areas off the site.

The subject site was subject to SSFRA in accordance with The OPW Flood Risk Management Guidelines. This SSFRA concluded that the subject site has a good level of flood protection up to the 100-year return event



and for pluvial floods exceeding the 100-year capacity of the drainage system then proposed flood routing mitigation measures are recommended.

- Residential development proposed is appropriate for the Site's flood zone category; and
- Planning System and Flood Risk Management Guidelines Sequential Approach is met and the 'Avoid' principal is achieved.

This SSFRA for the proposed development, suggests that the risk of flooding is low across the entire site and no further mitigation measures are necessary. A justification test is not considered to be required as they are required for 'highly vulnerable developments' located in Flood Zones A and B. This is set out in the *Site-Specific Flood Risk Assessment* (SSFRA) prepared by DBFL.

5.2.10 EIA Directive (2014/52/EU)

The EIA Directive 85/337 EEC, amended three times (in 1997, 2003 and 2009) and subsequently codified by Directive 2011/92/EU, which was itself amended in 2014 by Directive 2014/52/EU ('the amended Directive'), is the key legislation in EU Environmental Policy. The EIA Directive aims to determine the likely significant effects of a project on the environment. Screening is the first stage in the EIA process required by Article 4 of the EIA Directive and this process determines whether an EIA is required for a specific project. The Directive outlines in Article 4(1) 24 Annex I projects that require a mandatory EIA. Article 4 (2) outlines Annex II projects that require consideration for EIA further to a case-by-case examination or through thresholds and criteria set out by Member States. In an Irish context, projects requiring a mandatory EIA or consideration for EIA further to a case-by-case examination or thresholds are listed in Parts 1 and 2 of Schedule 5 of the Planning and Development Regulations.

An *Environmental Impact Assessment (EIAR)* has been prepared by BSM as part of this LRD application in accordance with the requirements as set out in the EIA Directive, (2011/92/EU), as amended by Directive 2014/52/EU and relevant guidelines and documentation.

5.2.11 Climate Action Plan 2025

The *Climate Action Plan 2025* (CAP25) is the third Climate Action Plan prepared under the Climate Action and Low Carbon Development (Amendment) Act 2021. CAP25 was published on 15th April 2025 and implements carbon budgets, sectoral emissions ceilings and sets out a roadmap for taking decisive actions to halve emissions by 2030 and ultimately reach net zero emissions no later than 2050.

A supplementary Annex of Actions was approved and published on which sets out the measures and actions that will support the delivery of Ireland's climate action ambition. These actions are set across a range of chapters and disciplines.

The proposed development has been designed to assist in achieving actions and policies as set out in the CAP25 and is set out in documents supporting this LRD application including the *Environmental Impact Assessment Report* prepared by BSM.



5.3 Regional Planning Policy

5.3.1 Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031 (2019)

The vision of the Regional Spatial and Economic Strategy (RSES) is *“To create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all”*. The RSES is a strategic plan that provides guidance in the form of Regional Policy Objectives (RPOs), providing a regional framework which goes on to inform local spatial planning and economic development throughout the Eastern and Midland region.

The RSES is based on three key principles:

2. “Healthy Placemaking: To promote people’s quality of life through the creation of healthy and attractive places to live, work, visit and study in.
3. Climate Action: The need to enhance climate resilience and to accelerate a transition to a low carbon economy recognising the role of natural capital and ecosystem services in achieving this.
4. Economic Opportunity: To create the right conditions and opportunities for the region to realise sustained economic growth and employment that ensures good living standards for all.” (page 4).

In accordance with the requirements of the NPF, the RSES contains a Metropolitan Area Strategic Plan (MASP) for the Dublin Metropolitan Area (DMA), which includes the location of the proposed development. The vision statement for the DMA is to:

“build on our strengths to become a smart, climate resilient and global city region, expanding access to social and economic opportunities and improved housing choice, travel options and quality of life for people who live, work, study in or visit the metropolitan area” (page 100).

The MASP set out an integrated land use and transportation strategy for the sequential development of the DMA. It is stated that this strategy will be focussed on:

- *“Consolidation of Dublin City and suburbs*
- *Key towns of Swords, Maynooth and Bray [and]*
- *Planned development of strategic development areas in Donabate, Dunboyne, Leixlip and Greystones”* (page 100).

The MASP seeks to focus housing delivery along high-quality public transport corridors (existing and planned) which have the capacity to accommodate significant development in an integrated and sustainable fashion. These include the ‘North-South Corridor (DART expansion)’ (now known as DART+ Coastal North), which is identified as having a potential long-term population capacity of 51,000:

*“The DART Expansion Programme, to be delivered by 2027 will increase capacity on the northern commuter line and **support ongoing large-scale urban expansion** of the North Fringe Lands and **Donabate**.”* (page 102, **emphasis** added by BSM).

In this context, Donabate is characterised as a *“strategically located rapidly growing coastal village”* with *“significant residential capacity”*. The MASP identifies enabling infrastructure needed to support large-scale residential development at Donabate, including the DART expansion (now permitted under ABP Ref. 320164), the DDR and railway bridge, social infrastructure, and local water network and storage upgrades.

5.4 Consistency with Local Planning Policy

5.4.1 Fingal Development Plan 2023-2029

The local planning policy framework is set out in the *Fingal Development Plan 2023-2029* (the Development Plan). The development plan governs future development of the subject lands (alongside the *Donabate Local*

Area Plan 2016 (as extended) – please see **Section 5.4.2**), through the setting of planning policies, objectives and design standards. This section discusses the specific provisions of the Development Plan in relation to development management standards, Core Strategy, Land Use Zoning and other general policy considerations relevant to the proposed development.

The Development Plan is underpinned by 4 no. key ‘cross-cutting’ themes:

- *“Climate Action*
- *Healthy Place-making and Sustainable Development*
- *Social Inclusion*
- *High-Quality Design”*. (page 10)

5.4.1.1 Strategic Vision

The Strategic Vision for the County sets out a series of objectives to shape the future growth of Fingal to plan for and support the sustainable long-term development of the County.

In short, the Strategic Vision states that:

“Fingal will embrace healthy placemaking and economic prosperity through building cohesive and sustainable communities, where our cultural, natural and built environment is protected.”
(page 10).

Section 1.4 of the Development Plans sets out the Strategic Policy through 13 No. objectives delivering the main aims of the Development Plan. We wish to highlight the following objectives in particular, which are highly relevant to the subject proposed development:

- **Objective No. 2:** *“Continue the development of a network of well-serviced, well-connected, sustainable neighbourhoods which have a range of facilities, a choice of tenure and universally designed adaptable house types, promote social inclusion and integration of all minority communities.”.*
- **Objective No. 3:** *“Ensure new residential development is of the highest quality, endorsing the principles of healthy placemaking, enabling life cycle choices and physical, community, recreation and amenity infrastructure are provided in tandem, to create sustainable, healthy, inclusive and resilient communities”.*
- **Objective No. 7:** *“Ensure the highest quality of public realm and urban design principles are applied to all new developments, ensuring developments contribute to a positive sense of place and local distinctiveness of an area and facilitate the universal design approach into all developments.”.*
- **Objective No. 12:** *“Protect, conserve and enhance the built and cultural heritage of Fingal, through promoting awareness, utilising relevant heritage legislation and ensuring good quality urban design principles are applied to all new developments. The principle that well planned and integrated development enhances the sustainability, attractiveness and quality of an area should be at the centre of any proposal.”.*

The proposed development supports the achievement of these objectives through design which is of high-quality, is well-connected, provides high-quality public and private open space and links to existing community uses, which will contribute to the creation of a sustainable community, and which fits within the overall Masterplan approach of these lands at Ballymastone.

The proposed development is in direct accordance with the Strategic Vision for Fingal County, by providing a high-quality and well-designed residential development, within the urban envelope of Donabate, with a diverse mix of tenure types and unit sizes to promote social inclusion, in the context of being in close proximity to sustainable transport nodes, and proposed to meet rigorous building standards, reducing operational emissions.



The proposed development is designed to include high-quality public open space, and will create a strong sense of place, with individual and appropriate character, which will create a distinguishing continuation of the previously permitted Phases 1 and 2 of the Ballymastone lands (FCC Reg. Ref. LRD0008/S3 & ABP Reg. Ref. 315288, and FCC Reg. Ref. LRD0039/S3 & ABP Reg. Ref. 320885 respectively).

5.4.1.2 Core Strategy, Settlement Hierarchy and Housing Strategy

Chapter 2 of the Development Plan identifies the quantum, location and phasing of development for the Development Plan period that is consistent with regionally defined population targets and settlement hierarchy (derived from the RSES – please see **Section 5.3.1**). It reflects the availability of existing services, planned investment, sequential development and environmental requirements (i.e. an evidence-based approach in determining the suitability of lands for zoning purposes) and therefore also provides the policy framework for all Local Area Plans (LAPs).

Table 2.20 of the Development Plan identifies Donabate (including Portrane) as a “*Self-Sustaining Growth Town*”, which is defined as follows:

“Self-Sustaining Growth Towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining.” (page 72).

The Development Plan continues to note that Donabate benefits from being aligned with the North-South Strategic Corridor, with existing rail service, which is to be improved through the DART expansion programme (DART+ Coastal North) (now permitted under ABP Ref. 320164). It notes that there has been substantial housing development in recent years, but that there remain significant areas of undeveloped land to the east (in reference to the subject lands) and to the south. The strategy identified for Donabate will “*promote the creation of a vibrant town core by providing a high-quality living environment for existing and future populations and provide all necessary community, commercial, cultural, and social facilities in tandem with new residential development.*” (page 84).

The Development Plan outlines the following policies with regard to Donabate (see **Table 5-1**).

Table 5-1: Self-Sustaining Growth Town Policies and Objectives

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
Policies		
Policy CSP31 – MASP Strategic Development Areas	Deliver strategic development areas identified in the MASP, located at key nodes along high-quality public transport corridors in tandem with the delivery of infrastructure and enabling services to ensure a steady supply of serviced sites and to support accelerated delivery of housing.	The proposed development seeks to deliver residential development in a strategic location, in proximity to Donabate railway station, which will see enhanced rail service, subject to delivery of the permitted DART+ Coastal North Programme.
Policy CSP32 – Donabate LAP	Facilitate development on zoned residential lands within the settlement boundary of Donabate as prescribed in the Donabate LAP. Support the provision of the necessary social and community infrastructure including recreational facilities and strengthen and enhance	The proposed development is in accordance with the provisions of the Donabate LAP (please refer to Section 5.4.2). The proposed development seeks to develop the third phase of the wider Ballymastone residential scheme,

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
	the public realm, providing improved levels of connectivity and permeability.	supporting the sustainable growth of Donabate.
Policy CSP33 – Consolidate Development and Protect Unique Identity of Donabate	Consolidate the development and protect the unique identity of Donabate.	The proposed development seeks to provide additional residential development with the existing envelope of Donabate. The proposed development has been designed taking the unique identity of Donabate into account, including sensitivities of the Architectural Conservation Area (ACA) of the St. Ita's Hospital Complex.
Objectives		
Objective CSO47 – Donabate Peninsula	Develop a continuous network of signed pathways and cycleways as appropriate, around Donabate Peninsula linking Portrane and Donabate to Malahide and Rush via the Rogerstown and Malahide Estuaries whilst ensuring the protection of designated sites and avoiding any routing along the northern boundary of Malahide Inner Estuary by virtue of its ecological sensitivity	The proposed development includes provision for a shared walking/cycling path through the development, facilitating ease of movement through the site for residents of the proposed development, and for neighbouring areas. The proposed connections will link up to permitted pedestrian/cycle facilities in Phases 1 and 2 of Ballymastone, and existing facilities on the DDR.
Objective CSO48 – Pedestrian and Cycleways in Donabate	Provide for a comprehensive network of pedestrian and cycle ways linking residential areas to one another, to the town centre, schools, the recreational campus at Ballymastone and the railway station.	The proposed development includes provision for a shared walking/cycling path through the development, facilitating ease of movement through the site for residents of the proposed development, and for neighbouring areas. The proposed connections will link up to permitted pedestrian/cycle facilities in Phases 1 and 2 of Ballymastone, and existing facilities on the DDR. This will facilitate movement to and from the future (permitted) Recreational Campus at Ballymastone and Donabate Town Centre and onward to the Railway Station.

Having regard to the objectives and policies listed in **Table 5-1** that are relevant to the proposed development, it is highlighted that the proposed development is within the settlement boundary of Donabate as prescribed in the Donabate LAP (see **Section 5.4.2** for more information regarding the LAP) and will provide the necessary social and community infrastructure, including recreational facilities, as identified as necessary in the *Community and Social Infrastructure Report* prepared by BSM, and strengthen and enhance the public realm, providing improved levels of connectivity and permeability for existing and future residents of the area. The proposed development includes a comprehensive network of walking and cycling infrastructure linking to neighbouring areas with onward connectivity to schools and the town centre, in addition to the permitted Ballymastone Recreational Campus (FCC Reg. Ref. PARTXI/004/21, see **Section 3.2.12**).

Having regard to the above, it is put forward that the proposed development is consistent with the core strategy of the Development Plan.

5.4.1.3 Sustainable Placemaking and Quality Homes

This portion of the Development Plan outlines principles to the “*successful placemaking and ensure quality housing within Fingal over the lifetime of this Plan and into the future*”. The Development Plan provides an extensive number of policies and objectives in this regard, and thus in the interests of brevity, only relevant policies and objectives relative to the proposed development are outlined in **Table 5-2**.

Table 5-2: Sustainable Placemaking and Quality Homes Relevant Policies and Objectives.

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
Policies		
Policy SPQHP1 – Healthy Placemaking	The Council will support the development and creation throughout Fingal of successful and sustainable settlements which endorse the principles of healthy placemaking and which through a multi-faceted approach to planning, design and management continue to ensure the development of attractive high-quality places to live, work, recreate, visit and invest in, served by a range of local services, provision of quality public realms, diverse and accessible community facilities for all genders, non-binary or none and open spaces for the benefit of the community.	The proposed development seeks to create a sustainable neighbourhood, integrating into the existing urban envelop of Donabate. The proposed development integrates the principles of healthy placemaking, and high-quality design, creating a diverse and vibrant community, support by existing, permitted and proposed facilities. Please refer to the <i>Architectural Design Statement</i> prepared by MDO for more detail regarding the design of the proposed development.
Policy SPQHP5 – Quality Placemaking	Add quality to the places where we live, work, and recreate by integrating high quality design into every aspect of the Plan, ensuring good quality accessible public realms, promotion of adaptable residential buildings, and by ensuring development contributes to a positive sense of place, local distinctiveness and character.	The proposed development includes high-quality public realm, designed in accordance with good placemaking principles, including appropriate provisions of universal access homes and homes that can be adapted for future needs. The proposed development has been designed to mesh with existing and permitted development

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
		appropriately, whilst having a distinctive character that is sympathetic to the architecture of the St. Ita's Hospital Complex ACA (where it overlaps with the subject site).
Policy SPQHP20 – Adaptable and Flexible Housing	Promote all new housing to be designed and laid out in an adaptable and flexible manner to meet the needs of the homeowner as they age as set out in Section 5.2 Flexibility and Adaptability Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities 2007 published by the Department of Environment, Heritage and Local Government.	The proposed development has been designed such that the homes can be adjusted, adapted and changed to meet the needs of the household over time, promoting flexibility for growing families, and aging in place, in accordance with relevant guidelines and policies. Please refer to the <i>Architectural Design Statement</i> prepared by MDO.
Policy SPQHP30 – Social, Affordable and Cost Rental Housing	Promote the provision of social, affordable and cost rental housing in accordance with the Fingal County Council Housing Strategy, Part V of the Planning and Development Act 2000, (as amended) by the Affordable Housing Act 2021 and government policy as outlined by the Department of Housing Local Government and Heritage Housing for All – A new Housing Plan for Ireland to 2030.	The proposed development is mixed tenure in nature, including social, affordable and private tenures, in accordance with an agreed Development Agreement between the Applicant and Fingal County Council. Please refer to the Part V pack prepared by MDO for more information regarding the agreed social housing element of the proposed development.
Policy SPQHP35 – Quality of Residential Development	Promote a high quality of design and layout in new residential developments at appropriate densities across Fingal, ensuring high-quality living environments for all residents in terms of the standard of individual dwelling units and the overall layout and appearance of developments. Residential developments must accord with the standards set out in the <i>Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas</i> , DEHLG 2009 and the accompanying <i>Urban Design Manual – A Best Practice Guide and the Sustainable Urban Housing; Design Standards for New Apartments (DHLGH as updated 2020)</i> and the policies and objectives contained within the <i>Urban Development and Building Heights</i>	The proposed development has been designed with a density of 35.3 dph, taking the overall site density for the wider Ballymastone scheme to 37.3 dph, which is in accordance with all relevant policies and guidelines. The proposed development's design will promote high-quality living standards and public environments. Within Ballymastone Phase 3, there is a portion of the proposed development within 1km of Donabate Railway Station, which has a density of 42.5 dph. The density of the portion of the proposed development outside of

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
	<i>Guidelines (December, 2018).</i> Developments should be consistent with standards outlined in Chapter 14 Development Management Standards.	1km of Donabate Railway Station is 32.7 dph.
Policy SPQHP36 – Private and Semi-Private Open Space	Ensure that all residential development within Fingal is provided with and has access to high quality private open space and semi-private open space (relative to the composition of the residential scheme) which is of a high-quality design and finish and integrated into the design of the residential development	The proposed development includes high-quality private open space for all residents, in the form of private gardens, terraces or balconies, depending on the unit type. Apartment blocks and duplex blocks are also provided with communal open space, the use of which is limited to apartment/duplex unit residents only. Please refer to the <i>Landscape Strategy Submission</i> prepared by CSR for more information about open space within the proposed development.
Policy SPQHP39 – Co-Ordinated Development	Promote residential development addressing shortfalls in housing provision and meeting target guidance figures through a co-ordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant and underutilised sites.	The proposed development will see the development of appropriately zoned and serviced land in accordance with the objectives of the Development Plan, in coordination with Fingal County Council per the agreed Development Agreement. The proposed development will address, in part, the need for housing in the county more widely.
Objectives		
Objective SPQHO1 – Sustainable Communities	Ensure that proposed residential development contributes to the creation of sustainable communities and accords with the <i>Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG 2009</i> (and any superseding document) and companion <i>Urban Design Manual – A Best Practice Guide, DEHLG 2009</i> and the <i>Design Manual for Urban Roads and Streets (DMURS)</i> (as revised).	The proposed development has been designed in accordance with all relevant policies and guidelines including the Urban Design Manual, the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities, and DMURS, amongst others. Please refer to Section Error! Reference source not found. of this report.
Objective SPQHO2 – Key Principles	Support development which enhances the quality of the built environment, promotes public health, and supports the	The proposed development has been designed in accordance with all relevant guidelines and policies,

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
	development of sustainable, resilient communities. In particular development which supports the following key principles will be supported: ■ Demonstrates compliance with the Guiding Principles for the creation of healthy and attractive places as set out in Healthy Placemaking, Regional Spatial and Economic Strategy (RSES) 2019–2031. ■ Promotes the development of healthy and attractive places to live, work, socialise and recreate through the delivery of high-quality public realms and open spaces which encourage physical activity and support wellbeing. ■ Is inclusive of all members of society, all genders, non-binary or none, irrespective of age, or levels of mobility. ■ Advocates a universal design approach and is socially inclusive. ■ Prioritise sustainable, active transport modes by e.g. providing safe cycle lanes and by facilitating public transport services in conjunction with State agencies to meet the needs of the community and to provide access to local services. ■ Encourages the development of car free neighbourhoods and streets, where appropriate. ■ Contributes to our climate goals.	such that it embodies principles of healthy placemaking, attractive and pleasant public realm and public open space, inclusive design, all whilst promoting the creation of a sustainable community. The proposed development minimises the need for car use and promotes active travel and public transport use.
Objective SPQHO10 – New Residential Development	Focus new residential development on appropriately zoned lands within the County, within appropriate locations proximate to existing settlement centres where infrastructural capacity is readily available, and along existing or proposed high quality public transport corridors and active travel infrastructure in a phased manner, alongside the delivery of appropriate physical and social infrastructure. Active travel options should also be considered while liaising with the National Transport Authority and Transport	The proposed development is located on appropriately zoned lands (please refer to Section 5.4.1.10), which is in close proximity to the existing settlement of Donabate. Infrastructure is either in place, or permitted and under construction as part of earlier phases that will complement delivery of Ballymastone Phase 3. Donabate is served by the 33b, 33d 33t and 33e with varying frequencies, and rail service from

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
	Infrastructure Ireland to ensure public transport options to and from new developments to local amenities such as shops and libraries.	Donabate railway station. Rail service is due to be enhanced with the introduction of new battery electric DART rolling stock due to enter service in 2026/2027, to be followed by electrification of the line as far as Drogheda as part of the DART+ Coastal North programme, which has been approved by An Coimisiún Pleanála. The proposed development includes permeability measures for walking and cycling, including connections to and from the subject site, and all residents will have access to bicycle storage in accordance with all relevant policies and guidelines. Please refer to the <i>Traffic and Transportation Assessment</i> prepared by DBFL for more information relating to public transport, access and active travel.
Objective SPQHO12 – Fingal Settlement Strategy	Ensure that all proposals for residential development accord with the Fingal Settlement Strategy and are consistent with Fingal's identified hierarchy of settlement centres.	The proposed development has been designed in accordance with the relevant settlement strategies and any other appropriate guidelines and strategies.
Objective SPQHO16 – Implementation of Local Area Plans, Masterplans and Framework Plans	Implement existing Local Area Plans, Masterplans and Framework Plans for areas designated on Development Plan maps in co-operation with relevant stakeholders, and actively seek the achievement of the specific objectives within.	The proposed development is in accordance with the Donabate LAP (please refer to Section 5.4.2) and seeks to develop the subject site in accordance with the specific objectives as set forth in the subject LAP.
Objective SPQHO31 – Variety of Housing Types	Encourage the creation of attractive, mixed use and sustainable residential communities which contain a wide variety of housing and apartment types, sizes, tenures and typologies in accordance with the Fingal Housing Strategy, the HNDA with supporting community facilities, amenities and services.	The proposed development will form an attractive sustainable residential community, including a variety of housing and apartment types and tenures. Please refer to the <i>Housing Quality Audit</i> prepared by MDO and the <i>Architectural Design Statement</i> also prepared by MDO for additional detail.
Objective SPQHO33 – New Residential	Ensure new residential development incorporates energy efficiency measures	The proposed development will incorporate energy efficiency

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
Development and Energy Efficiency	and promotes innovative renewable energy opportunities, for example by passive solar design, natural ventilation, and vegetation (green roofs etc) on buildings and makes most effective and sustainable use of water, aggregates and other resources.	measures such that it meets or exceeds all relevant building standards. Blocks have been orientated to take advantage of solar exposure. Please refer to the <i>Architectural Design Statement</i> prepared by MDO, the <i>Climate Action Energy Statement</i> prepared by ENX and the <i>Daylight Sunlight Analysis</i> prepared by IN2 for more information.
Objective SPQHO34 – Integration of Residential Development	Encourage higher residential densities where appropriate ensuring proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area with a target minimum amount of 15% (except in cases where the developer can demonstrate that this is not possible, in which case the 12% to 15% range will apply) amount of green space, tree coverage and public space associated with every residential area.	The proposed development includes appropriate densities given the relative proximity to Donabate town centre and railway station. Overall, the proposed densities can be summarised as follows: ■ Overall Ballymastone Masterplan Density (including phases 1, 2 and 3): 37.3 dph; ■ Ballymastone Phase 3 (within 1km of Donabate Railway Station): 42.5 dph; ■ Ballymastone Phase 3 (beyond 1km of Donabate Railway Station): 32.7 dph; and ■ Overall Ballymastone Phase 3: 35.3 dph. It is proposed to include c. 15.3% open space across the subject site, which is provided in the form larger public open space areas and pocket parks, including outdoor gym and play equipment.
Objective SPQHO43 – Contemporary and Innovative Design Solutions	Promote the use of contemporary and innovative design solutions subject to design respecting the character and architectural heritage of the area.	The proposed development is designed using contemporary standards and materials, whilst respecting the character of the local area and architectural styles of the St. Ita's Hospital Complex ACA, in which part of the proposed development is located.

The proposed development is fully aligned with the relevant policies and objectives set out in the Development Plan. It supports the creation of a high-quality, sustainable, and inclusive residential environment through its thoughtful design and layout, which fosters a strong sense of place and community, whilst respecting sensitivities such as the St. Ita's Hospital Complex ACA. The development provides for a mix of housing types and tenures, facilitating flexibility and adaptability to meet the diverse needs of current and future residents, including those of varying ages, mobility levels, and family compositions.

The proposed development ensures integration with surrounding infrastructure and makes efficient use of appropriately zoned lands. It promotes active and sustainable modes of transport and encourages access to high-quality public realm and open spaces that enhance physical and mental well-being. High standards of design, energy efficiency, and environmental performance are central to the proposal, ensuring it contributes positively to climate resilience and resource efficiency.

Overall, the development demonstrates a comprehensive and coordinated approach that is consistent with the principles of healthy placemaking, delivers a high standard of residential amenity, and supports the long-term goal of creating sustainable and vibrant communities within Fingal.

5.4.1.4 Community Infrastructure and Open Space

Section 4 of the Development Plan outlines objectives and policies that support the development of community infrastructure and open space. Relevant policies and objectives have been listed in **Table 5-3**.

Table 5-3: Community Infrastructure and Open Space Relevant Policies and Objectives

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
Policies		
Objective CIOSO5 – 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.	The proposed development includes provision of a community space (c. 100 sq.m) which will be made available to residents and community groups. This space is incorporated into the block containing the crèche space to the northwest of the site. Please refer to Section 6.9 of this report.
Policy CIOSP8 – Sports Facilities	Ensure that all communities in the County are facilitated with a variety of sporting facilities that are fit for purpose, accessible and adaptable.	The proposed development is in close proximity to the permitted Ballymastone Recreation Hub, and is due for delivery by FCC. Furthermore, the subject site is located near to several other existing sports facilities. Please refer to the <i>Community and Social Infrastructure Report</i> prepared by BSM for more detailed information.
Policy CIOSP10 – Childcare Facilities	Support the provision of appropriate childcare facilities.	The proposed development includes provision of a childcare facility of sufficient size to accommodate the childcare needs generated by future residents.

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
		Please see the <i>Schools Demand and Childcare Facilities Assessment</i> prepared by BSM, the <i>Architectural Design Statement</i> prepared by MDO and relevant architectural drawings, also prepared by MDO.
Objectives		
Objective CIO27 – Optimum Childcare Locations	Encourage the provision of childcare facilities in appropriate locations, including residential areas, town and local centres, areas of employment and areas close to public transport nodes. Encourage the co-location of childcare facilities and community facilities where appropriate, such as community centres and schools, with an emphasis on community and not for profit childcare facilities where appropriate.	The proposed development includes provision of a childcare facility of sufficient size to accommodate the childcare needs generated by future residents. Please see the <i>Schools Demand and Childcare Facilities Assessment</i> prepared by BSM, the <i>Architectural Design Statement</i> prepared by MDO and relevant architectural drawings, also prepared by MDO.
Objective CIO28 – Childcare Facilities and New Development	Require the provision of appropriate childcare facilities as an essential part of new residential and mixed-use developments in accordance with the provisions of the Childcare Facilities Guidelines for Planning Authorities 2001 or any superseding Guidelines, or as required by the Planning Authority. Such facilities should be provided in a timely manner and be an integral part of the development proposal.	The proposed development includes provision of a childcare facility of sufficient size to accommodate the childcare needs generated by future residents. The design and sizing of the proposed crèche have been determined in accordance with the Childcare Facilities Guidelines for Planning Authorities 2001. Please see the <i>Schools Demand and Childcare Facilities Assessment</i> prepared by BSM, the <i>Architectural Design Statement</i> prepared by MDO and relevant architectural drawings, also prepared by MDO.
Objective CIO38 – Public Open Space Provision	Require a minimum public open space provision of 2.5 hectares per 1000 population. For the purposes of this calculation, public open space requirements are to be based on residential units with an agreed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.	The proposed development includes 222 no. units with two or fewer bedrooms, and 176 no. units with three or more bedrooms. As such, using the quantities noted in the objective, the expected population for the purposes of open space requirements is c.949 no. people. This would require c.2.37ha of Class 1 (75% - 1.77ha) and Class 2 (25% - 0.6ha) public

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
		open space. It is proposed to provide c.1.73ha of Class 2 public open space on the site. Please refer to the <i>Landscape Strategy Submission</i> and accompanying landscape drawings prepared by CSR.
Objective CIO5041 – Accessible and Safe Open Space	Ensure public open space is accessible and safety is prioritised by incorporating passive surveillance.	The proposed development includes extensive public open space that is accessible to all residents, including play equipment and outdoor exercise equipment, with safety prioritised using adequate public lighting and passive surveillance achieved by siting active frontage face public open spaces. Please refer to the <i>Landscape Strategy Submission</i> prepared by CSR for further information regarding the design of the public open space.
Objective CIO5044 – Playgrounds	Facilitate the provision of appropriately scaled children's playground facilities within new and existing residential development in line with the Council's Play Policy.	The proposed development includes provision of appropriately scaled children's play areas, designed in accordance with FCC play policy. Please refer to the <i>Landscape Strategy Submission</i> prepared by CSR.
Objective CIO5051 – Permeability	Ensure permeability and connections between public open spaces including connections between new and existing spaces, in consultation with residents.	The proposed development includes provision of key permeability links between public open space, proposed residential areas, and existing spaces. Please refer to the <i>Traffic and Transportation Assessment</i> prepared by DBFL for details regarding site permeability.
Objective CIO5052 – Trees	Protect, preserve and ensure the effective management of trees and groups of trees.	The proposed development seeks to preserve and protect as much of the existing tree cover and vegetation as is practical and seeks to introduce additional planting in public open space, communal residential space, private residential amenity areas, buffer

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
		areas and street tree planting. Please refer to the <i>Landscape Strategy Statement</i> prepared by CSR and the arboricultural documentation prepared by John Morris Arboricultural Consultancy.
Objective CIO53 – Open Space and Privacy	Ensure all areas of private open space have an adequate level of privacy for residents through the minimisation of overlooking and the provision of screening arrangements.	The proposed development has been designed with regard to all relevant guidelines and policies regarding set-back distances, privacy and overlooking, to ensure that private open space has adequate levels of privacy. Please refer to the <i>Architectural Design Statement</i> prepared by MDO and the <i>Housing Quality Audit</i> also prepared by MDO.

The proposed development reflects a strong commitment to the delivery of a crèche, community space, public open space, and cycle and pedestrian links throughout the development, supporting both the proposed residential development and neighbouring permitted and existing developments. A *Community and Social Infrastructure Report* has been prepared by BSM. It considers appropriate community facilities in line with the scale of the development and local context, ensuring that the necessary services and amenities are either provided on-site or that sufficient existing capacity is available nearby. The development supports a comprehensive and inclusive approach to infrastructure provision, informed by good planning practice.

Childcare provision is appropriately addressed within the development, ensuring facilities are located where they can best serve the local population, with a particular emphasis on accessibility, integration with other community services, and long-term viability. As such, a crèche is proposed, with an internal area of c. 646.3 sq.m and external play space. Please refer to the *Schools Demand & Childcare Facilities Assessment* prepared by BSM.

Public open space is thoughtfully planned and meets the required quantitative and qualitative standards. It is accessible, well-distributed throughout the development, and designed to be safe, inviting, and suitable for all age groups, with dedicated children's play areas incorporated where appropriate.

The development prioritises permeability and connectivity, enhancing links within the scheme and to the wider area, such as The Links, the DDR and the wider Ballymestone development, while also safeguarding privacy and residential amenity. Existing trees and natural features are respected and integrated into the landscape design where possible, contributing to environmental quality and the sense of place. Overall, the proposal supports the development of a cohesive, well-served, and socially sustainable community in accordance with FCC's policies and objectives regarding community infrastructure and open space.

5.4.1.5 Climate Action

It is important to consider the impacts of any development as it relates to climate change. The Development Plan integrates the need to take climate action by stipulating a series of policies and objectives that support national and regional climate action goals and objectives, "focusing on the various elements of mitigation and adaptation such as compact and sustainable settlement patterns, a resilient built environment, green

infrastructure, energy efficiency and clean energy and sustainable transport”, those of which are relevant to the subject development, are outlined in **Table 5-4**.

Table 5-4: Climate Action Relevant Policies

Policy Number and Title	Policy	Consistency of Proposed Development with Policy/Objective
Policies		
Policy CAP3 – Climate Resilient Settlement Patterns	Promote sustainable settlement and transport strategies within the county and identify measures, including targets for modal shift, to reduce energy use, GHG emissions and adaptation to climate change.	The proposed development seeks to support the sustainable settlement and transport strategies within Fingal County, and proposes to provide residential development within the urban influence of Donabate, in proximity to sustainable transport links including local bus routes and Donabate Railway Station (please refer to the <i>Traffic and Transportation Assessment</i> prepared by DBFL). It is also proposed to provide key walking and cycling links throughout the site, connecting with The Links road, Ballymastone Phases 1 and 2, and the DDR, within onward connection to the permitted Ballymastone Recreation Centre (pending construction by FCC). This will assist in promoting sustainable travel and reducing energy use.
Policy CAP5 – Climate Mitigation and Adaptation in the Built Environment	Ensure the built environment is equipped for the impacts of climate change by supporting climate change mitigation and adaptation measures as part of new and existing developments.	The proposed development has been designed taking climate change impacts into account – for example SuDS features have been included throughout the site to ensure the sustainable management of surface water drainage, and this has been calculated to include allowance for 20% increase in rainfall as a result of expected climate change impacts. Please refer to the <i>Infrastructure Design Report</i> and <i>Site-Specific Flood Risk Assessment</i> prepared by DBFL.
Policy CAP10 – Climate Mitigation Actions in the Built Environment	Promote low carbon development within the County which will seek to reduce carbon dioxide emissions and which will meet the highest feasible environmental standards during construction and occupation. New development should generally demonstrate/provide for:	The proposed development has been designed such that the layouts take advantage of daylight and aspect benefits (please refer to the <i>Daylight and Sunlight Analysis</i> prepared by IN2).

Policy Number and Title	Policy	Consistency of Proposed Development with Policy/Objective
	a. Building layout and design which maximises daylight, natural ventilation, active transport and public transport use; b. Sustainable building/services/site design to maximise energy efficiency; c. Sensitive energy efficiency improvements to existing buildings; d. Energy efficiency, energy conservation, and the increased use of renewable energy in existing and new developments; e. On-site renewable energy infrastructure and renewable energy; f. Minimising the generation of site and construction waste and maximising reuse or recycling; and g. The use of construction materials that have low to zero embodied energy and CO2 emissions.	The subject site is in proximity to active travel links, including those provided in Phases 1 and 2 of Ballymastone, and existing facilities on the DDR. The proposed development will further expand on the active travel opportunities through expanded provision of connections and bicycle parking for all future residents. The proposed development also takes advantage of existing public transport in the area, including the existing 33b, 33d, 33t, 33e and rail services from Donabate Railway Station. Bus services are due to be improved as part of the BusConnects Dublin programme and rail services are to be expanded as part of the wider DART+ programme. Please refer to the <i>Traffic and Transportation Assessment</i> prepared by DBFL. The proposed development will be constructed in accordance with all relevant building standards and specifications ensuring an energy efficient and comfortable living environment for residents. A <i>Preliminary Construction & Environmental Management Plan</i> has been prepared by DBFL and submitted as part of the subject LRD planning application.
Policy CAP11 – Climate Adaptation Actions in the Built Environment	Development proposals should demonstrate sustainable design principles for new buildings/ services/site. The Council will promote and support development which is resilient to climate change. This would include: a. Measures such as green roofs and green walls to reduce internal overheating and the urban heat island effect; b. Ensuring the efficient use of natural resources (including water) and	The proposed development has been designed to include the provision of green roofs where possible (including for example flat roofs on the proposed apartment blocks). The overall site of the proposed development has been designed to take advantage of existing planting and biodiversity and also includes effective use of SuDS features to sustainably manage surface water run-off through nature-based solutions. Pollution via surface water

Policy Number and Title	Policy	Consistency of Proposed Development with Policy/Objective
	making the most of natural systems both within and around buildings; c. Minimising pollution by reducing surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems (SuDS); d. Reducing flood risk, damage to property from extreme events—residential, public and commercial; e. Reducing risks from temperature extremes and extreme weather events to critical infrastructure such as roads, communication networks, the water/drainage network, and energy supply; f. Promoting and protecting biodiversity and green infrastructure.	drainage will be managed in accordance with relevant guidance and standards, through features such as tree pit drainage, petrol interceptors, etc. Please refer to the <i>Infrastructure Design Report</i> prepared by DBFL. A <i>Site-Specific Flood Risk Assessment</i> has also been prepared by DBFL. The proposed development seeks to promote and protect biodiversity and green infrastructure. Please refer to the <i>Landscape Strategy Submission</i> prepared by CSR, <i>Natura Impact Statement</i> prepared by BSM and arboricultural inputs prepared by John Morris Arboricultural Consultancy.
Policy CAP12 – Climate Action Energy Statements	All new developments involving 15 residential units and/or more than 1,000 sq. m. of commercial floor space, or as otherwise required by the Planning Authority, will be required to submit a Climate Action Energy Statement as part of the overall Design Statement to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development.	A standalone <i>Climate Action Energy Statement</i> has been prepared by ENX and submitted as part of the subject LRD planning application.
Policy CAP30 – Natural Flood Risk Mitigation	Encourage the use natural flood risk mitigation or nature-based solutions including integrated wetlands, green infrastructure, and Sustainable Drainage Systems (SuDS) as part of wider adaptation and mitigation responses to achieve flood resilience.	The proposed development has been designed to incorporate natural flood risk mitigation measures, including nature-based solutions and SuDS features. Please refer to the <i>Infrastructure Design Report</i> prepared by DBFL and the <i>Landscape Design Strategy</i> prepared by CSR and all relevant engineering and landscaping drawings prepared by both DBFL and CSR.

The proposed development demonstrates a clear commitment to climate action and environmental sustainability, aligning with the policies aimed at promoting climate resilience and low-carbon development in Fingal. It incorporates measures that support sustainable settlement patterns, encourages a modal shift

towards active and public transport, and reduces dependence on fossil fuels, working meaningfully toward the reduction of greenhouse gas emissions and energy consumption.

Through its design and construction, the development includes climate mitigation and adaptation features that enhance its environmental performance and resilience. These include building layouts that maximise natural daylight and ventilation and the integration of energy-efficient systems.

Adaptation strategies have been incorporated into the proposal to future-proof the development against climate-related risks. These include the use of SuDS to manage surface water and reduce flood risk, as well as green infrastructure features such as permeable surfaces, green roofs (where possible), and landscaping that support biodiversity and help mitigate the urban heat island effect.

In accordance with the relevant requirements, a *Climate Action Energy Statement* has been prepared by ENX and submitted to demonstrate how the development adopts low-carbon heating and energy solutions and considers energy conservation from the earliest design stages. The development also addresses flood risk through site-specific assessments and, where applicable, employs nature-based solutions to enhance flood resilience. A *Site-Specific Flood Risk Assessment* has been prepared by DBFL to accompany the LRD planning application.

Overall, the scheme contributes to FCC's goals for sustainable, climate-resilient urban development and reflects best practice in energy efficiency, environmental protection, and climate change adaptation, and is consistent with the outlined policies.

5.4.1.6 Connectivity and Movement

The Development Plan addresses the need for careful development and management of mobility infrastructure and behaviours, in accordance with national and regional plans and strategies such as the National Transport Authority's (NTA) *Transport Strategy for the Greater Dublin Area 2022-2042* and the *National Sustainable Mobility Policy*. The Development Plan sets out a series of policies and objectives relating to mobility under the following headings, those of which are relevant, are listed in **Table 5-5**:

- The role of transportation policy in addressing climate change;
- Demand management;
- Integration of land-use and transport;
- Area based transport assessment;
- Mobility management;
- A sustainable and integrated transport network;
- Public transport;
- Car parking management;
- Protection of strategic transport connections; and
- Roads network.

Table 5-5: Connectivity and Movement Relevant Policies and Objectives

Policy/Objectives Number and Title	Policy/Objective	Consistency of Development Policy/Objective Proposed with
Policies		
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	The proposed development includes measures to both decarbonised motorised transport and facilitate modal shift. All houses will be constructed to facilitate the installation of an at-

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
	policy and guidance, while supporting an efficient and effective transport system.	home EV charger if required by the residents. Public EV chargers will be installed in accordance with the proposal contained within the <i>Traffic and Transportation Assessment</i> prepared by DBFL. Walking and cycling connections are provided throughout the site, including appropriate public lighting and passive surveillance to promote public safety. All residents will be provided with appropriate cycle storage in accordance with the Development Plan and national policy. The proposed development is located in proximity to local bus service and rail services from Donabate Railways station. Bus service is due to be enhanced as part of the BusConnects Dublin programme, and rail service is due to be enhanced as part of the wider DART+ programme, including new battery-electric DART trainsets and electrification of line infrastructure (permitted development as part of DART+ Coastal North – ABP Reg. Ref. 320164).
Policy CMP2 – Managing Demand for Travel	Concentrate compact growth around existing and planned transport services ensuring that transport and land-use are integrated to the greatest extent possible so that the demand for travel in general and for car-based travel is reduced.	The proposed development is located in proximity to local bus service and rail services from Donabate Railways station. Bus service is due to be enhanced as part of the BusConnects Dublin programme, and rail service is due to be enhanced as part of the wider DART+ programme, including new battery-electric DART trainsets and electrification of line infrastructure (permitted development as part of DART+ Coastal North – ABP Reg. Ref. 320164).

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
Policy CMP12 – Public Realm	Support and facilitate the provision of high-quality and attractive public realm that is accessible for all with a focus on improving connectivity and permeability in accordance with best practice public realm and guidance documents.	The proposed development features high-quality public realm that is attractive, utilising high-quality materials, landscaping and planting. The site includes walking and cycling connections and permeability throughout ensuring good accessibility in accordance with relevant guidance and documentation. For more details regarding the design of the public realm and streets, please refer to the <i>Landscape Strategy Submission</i> prepared by CSR and the <i>DMURS Design Statement</i> prepared by DBFL.
Policy CMP14 – Permeable Neighbourhoods	Implement the provisions of the Design Manual for Urban Roads and Streets 2019 (DMURS) and the DMURS Interim Advice Note – Covid 19 Pandemic Response 2020 in relation to the delivery of safe streets and overall best practice design and promote the principle of filtered permeability in new developments to ensure that all pedestrian entrances are opened as soon as any new development is occupied where feasible and seek opportunities to improve permeability in existing developed areas in accordance with NTA's Permeability Best Practice Guide.	The proposed development, including the proposed streets and public realm, have been designed in accordance with best practice guidance, including DMURS. Please refer to the <i>DMURS Design Statement</i> prepared by DBFL.
Objectives		
Objective CMO3 – Integration of Public Transport and Development	Support and facilitate high-density, mixed-use development and trip intensive uses along public transport corridors and to ensure the integration of high-quality permeability links and public realm in conjunction with the delivery of public transport services through plan frameworks to generate and reinforce sustainable patterns of compact growth and development in the County.	The proposed development is located in proximity to local bus service and rail services from Donabate Railways station. Bus service is due to be enhanced as part of the BusConnects Dublin programme, and rail service is due to be enhanced as part of the wider DART+ programme, including new battery-electric DART trainsets and electrification of line infrastructure (permitted development as part of DART+

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
		Coastal North – ABP Reg. Ref. 320164).
Objective CMO6 – Improvements to the Pedestrian and Cyclist Environment	Maintain and improve the pedestrian and cyclist environment and promote the development of a network of pedestrian/cycle routes which link residential areas with schools, employment, recreational destinations and public transport stops to create a pedestrian/cyclist environment that is safe, accessible to all in accordance with best accessibility practice.	The proposed development includes provision of walking and cycling infrastructure that provides connection to existing and permitted facilities, including Ballymastone Phases 1 and 2, the DDR with onward connection to the Ballymastone Recreational Hub (permitted, subject to the delivery by FCC). The site includes permeable connections, allowing for links between the subject site and schools, areas of employment, recreation destinations and public transport.
Objective CMO16 – Public Realm and Development	Encourage and facilitate the delivery of high-quality public realm in tandem with new developments throughout the County through the Development Management process and the retrospective provision in existing developments, including the provision of a pedestrianised core in town centres where appropriate.	The proposed development includes provision of high-quality public realm, which is shown throughout the LRD planning application documentation, including the <i>Landscape Strategy Submission</i> and accompanying landscape drawings prepared by CSR, the <i>CGI Image Book</i> and associated architectural drawings including proposed site layout plans prepared by MDO and <i>Verified Photomontages</i> prepared by Modelworks.
Objective CMO32 – Car Parking Standards	Implement appropriate car parking standards for a range of land-use types, where provision is based on factors such as site location, level of public transport accessibility and impact of parking provision on local amenity.	The proposed quantity of parking spaces for the development is noted in the <i>Traffic and Transportation Assessment</i> prepared by DBFL, and is in accordance with relevant guidelines and policies, including the Development Plan and S28 Guidelines.
Objective CMO43 – Roads and Street Proposals and Green Infrastructure	Ensure that all new roads and streets are designed to enhance insofar as feasible, the County's Green Infrastructure network by ensuring adequate	The proposed roads and streets associated with the proposed development have been designed with green infrastructure including

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
	replacement and additional planting of native species and pollinators and to ensure that SuDS approaches are used to treat surface water run-off.	tree planting, landscaping, permeable paving (where appropriate) and other SuDS features including tree pits. The proposed planting includes native species planting and pollinator friendly planting. Please refer to the <i>Landscape Design Strategy</i> and drawing no. 19164-2-3171 (Planting Strategy), both prepared by CSR.
Objective CMO45 – Design Manual for Urban Roads and Streets	Design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within DMURS. ■ Junctions will be designed with corner radii that reduce pedestrian crossing distances to the minimum allowable by DMURS wherever possible. ■ The narrowest carriageway widths allowable by DMURS will be the default standard in Fingal wherever possible.	The proposed streets and roads have been designed in accordance with the principles, approaches and standards contained within DMURS. Please refer to the <i>DMURS Design Statement</i> prepared by DBFL.
Objective CMO48 – Roads and Streets and Green Infrastructure	New roads and streets to incorporate green Infrastructure elements such as sustainable drainage infrastructure, planting of native trees, hedgerows and pollinator species in medians and on roadside verges, as appropriate to the location.	The proposed development sees green infrastructure elements including SuDS features, native tree planting, hedgerow retention and infill planting, and provision of pollinator-friendly species. Please refer to the <i>Landscape Design Strategy</i> and drawing no. 19164-2-3171 (Planting Strategy), both prepared by CSR.

The proposed development is fully consistent with FCC's sustainable transport and mobility policies and objectives. It promotes a compact, well-connected urban form that supports a reduction in car dependency and encourages a shift towards more sustainable modes of transport, such as walking, cycling, and public transport. The location and layout of the development reflect a strong integration of land use and transportation, minimising the need for private vehicle travel and supporting active and low-carbon mobility options. The proximity to the town centre of Donabate, and the railway station encourages active travel and public transport use.

High-quality pedestrian and cycle infrastructure is prioritised throughout the scheme, creating a safe, accessible, and attractive environment for people of all ages and abilities. These routes are designed to connect key destinations within and beyond the site, including public transport nodes, and local amenities,

in line with best practice guidance. The development incorporates permeability principles that facilitate ease of movement and encourage active travel, in accordance with the *Design Manual for Urban Roads and Streets* (DMURS) and associated national guidelines.

The public realm is designed to a high standard, with a strong focus on accessibility, placemaking, and connectivity. Streets and open spaces are planned to enhance the user experience while also contributing to green infrastructure through integrated planting, use of pollinator-friendly species, and sustainable drainage features (SuDS elements).

New road and street infrastructure within the development will adhere to DMURS principles, including reduced carriageway widths, which contribute to safer and more pedestrian-friendly environments (please refer to the *DMURS Design Statement* prepared by DBFL). Green infrastructure elements are included throughout the design, with the inclusion of native planting, SuDS features, and streetscape enhancements that align with both mobility and environmental objectives.

The proposed development includes a sustainable approach to urban mobility, land use, and street design, and supports the delivery of an accessible, climate-resilient, and vibrant community. As such, the proposed development is consistent with the connectivity and movement policies and objectives.

5.4.1.7 Green Infrastructure and Natural Heritage

Green infrastructure and natural heritage are deeply connected to planning policy, and the Development Plan aims to address relevant environmental issues and protect and preserve the natural heritage of the county. As Donabate is in close proximity to important natural heritage areas, it is prudent to consider any relevant policies and objectives, which are outlined in **Table 5-6**.

Table 5-6: Green Infrastructure and Natural Heritage Relevant Policies and Objectives

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
Policies		
Policy GINHP3 – Greening of Developments	Encourage measures for the ‘greening’ of new developments including the use of green roofs, brown roofs, green walls and water harvesting. Where feasible require new developments to incorporate greening elements such as green roofs, brown roofs, green walls, green car parking and SuDs (e.g. clean water ponds fed by rainwater via downpipes).	The proposed development includes provision of greening measures including green roofs and SuDS elements. Please refer to drawing nos. 19164-2-3121 (Public Open Space, Communal Open Space & SUDS) and 19164-2-0121 (Green Infrastructure Plan), both of which have been prepared by CSR, for more detailed information.
Policy GINHP6 – Multi-Functionality	Ensure delivery of multifunctional green and civic spaces that meet community needs, promote active and passive recreation, flood and surface water management and local habitat improvements. The multi-functionality of spaces will be balanced against the need to protect and enhance local habitat and the recreational and functional requirements of parks.	The green spaces proposed as part of Ballymastone Phase 3 are intended to be multi-use, meeting community recreation, play and exercise needs, whilst also supporting sustainable management of surface water drainage and biodiversity. The proposed landscaping seeks to protect and enhance local habitats. Please refer to the <i>Landscape</i>

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
		<i>Design Strategy</i> and drawing no. 19164-2-3171 (Planting Strategy), both prepared by CSR.
Policy GINHP21 – Protection of Trees and Hedgerows	Protect existing woodlands, trees and hedgerows which are of amenity or biodiversity value and/ or contribute to landscape character and ensure that proper provision is made for their protection and management in line with the adopted Forest of Fingal-A Tree Strategy for Fingal.	The proposed development layout has been designed to ensure that as much woodland, trees and hedgerows have been protected and preserved, providing important biodiversity value and amenity. Please refer to the <i>Landscape Strategy Submission</i> prepared by CSR and the arboricultural documentation prepared by John Morris Arboricultural Consultancy.
Policy GINHP22 – Tree Planting	Provide for appropriate protection of trees and hedgerows, recognising their value to our natural heritage, biodiversity and climate action and encourage tree planting in appropriate locations.	The proposed development seeks to preserve and protect existing trees and hedgerows insofar as possible. Please refer to the arboricultural inputs prepared by John Morris Arboricultural Consultancy and drawing no. 19164-2-3120 (Vegetation Retention and Removal) prepared by CSR.
Objectives		
Objective GINHO3 – Biodiversity in Open Space	Make provision for biodiversity within public open space and include water sensitive design and management measures (including SuDS) as part of a sustainable approach to open space design and management.	The proposed development includes notable provision for biodiversity in public open space, seeking to maintain existing woodland area alongside the existing development of Priory Wood and hedgerows elsewhere on the site. SuDS measures have also been proposed to sustainably manage surface water drainage.
Objective GINHO7 – Provision of Open Space	Provide a range of accessible new parks, open spaces and recreational facilities accommodating a wide variety of uses (both passive and active), use intensities and interests.	The proposed development regarding parks and play spaces provides for a wide range of uses, including play, exercise, recreation, and spaces for young people to socialise. Please refer to the series of public open space drawings and play provision drawings prepared by CSR.

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
Objective GINHO12 – Green Infrastructure Requirements	Ensure the provision of new green infrastructure addresses the requirements of functional flood storage, the sustainable management of coastal erosion, and links with provision for biodiversity, Sustainable Drainage Systems (SuDS) and provision for parks and open space wherever possible and appropriate.	The proposed development includes the provision of extensive green infrastructure, including protection and preservation of existing hedgerows and woodland, new landscaping and planting, green roofs, SuDS features, pocket parks and small park areas, street tree planting, etc. Please refer to drawing no. 19164-2-0121 (Green Infrastructure Plan) prepared by CSR.
Objective GINHO15 – SuDS	Limit surface water run-off from new developments through the use of appropriate Sustainable Urban Drainage Systems (SuDS) using nature-based solutions and ensure that SuDS is integrated into all new development in the County.	The proposed development design incorporates SuDS features as appropriate, serving to reduce run-off rates from the site, using detention, attenuation, and soaking (where relevant). Please refer to the <i>Infrastructure Design Report</i> prepared by DBFL and relevant engineering drawings, in addition to relevant landscape drawings including drawing no. 19164-2-3121 (Public Open Space, Communal Open Space & SUDS) prepared by CSR.
Objective GINHO17 – Fingal Heritage Plan	Protect, conserve and enhance landscape, natural, cultural and built heritage features, and support the objectives and actions of the Fingal Heritage Plan.	Please refer to Chapter 15 of the <i>Environmental Impact Assessment Report</i> prepared by BSM. The proposed development seeks to conserve and enhance the natural, cultural and built heritage of the area. Please also refer to the <i>Architectural Design Statement</i> prepared by MDO, which includes items relating to the regard paid to architectural heritage of the surrounding area.
Objective GINHO28 – Protection of Natural Heritage Areas	Ensure that development does not have a significant adverse impact on proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves, Refuges for Fauna, Habitat Directive Annex I sites and Annex II species contained therein, and on rare	The proposed development has been screened for any possible impacts with regard to the heritage areas and environmental designations. Please refer to the <i>Environmental Impact Assessment Report</i> prepared by BSM and the

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
	and threatened species including those protected by law and their habitats.	<i>Natura Impact Assessment</i> also prepared by BSM.
Objective GINHO32 – Development and Invasive Species	Ensure that proposals for development do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are or were previously present, the applications will be required to submit a control and management program for the particular invasive species as part of the planning process and to comply with the provisions of <i>European Communities (Birds and Natural Habitats) Regulations 2011</i> and <i>EU Regulations 1143/2014</i> .	Please refer to the <i>Environmental Impact Assessment Report</i> prepared by BSM for information regarding management of invasive species, in accordance with relevant guidelines and regulations.
Objective GINHO35 – Appropriate Assessment	In accordance with Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities 2010, any plans or projects that are likely to have a significant effect on a Natura 2000 site, either individually or in combination with other plans or projects, are subject to a screening for Appropriate Assessment unless they are directly connected with or necessary to the management of a Natura 2000 site.	A <i>Natura Impact Statement</i> prepared by BSM has been provided with respect to the subject proposed development.
Objective GINHO46 – Tree Removal	Ensure adequate justification for tree removal in new developments and open space management and require documentation and recording of the reasons where tree felling is proposed and avoid removal of trees without justification.	It is proposed to retain, protect and preserve the existing trees and hedgerows on site. Some existing trees and hedgerow (outlined in drawing no. 19164-2-3120 Vegetation Retention and Removal prepared by CSR) are required to be removed. Please refer to the arboricultural inputs prepared by John Morris Arboricultural Consultancy for more information with regard to justification for removal.
Objective GINHO57 – Development and Landscape	Ensure development reflects and, where possible, reinforces the distinctiveness and sense of place of the landscape character types, including the retention of important features or characteristics, taking into account the various elements which contribute to their distinctiveness	Please refer to the <i>Architectural Design Statement</i> prepared by MDO and the <i>Landscape Strategy Submission</i> prepared by CSR. The proposed development is designed to reinforce both the natural and built heritage of the surrounding

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
	such as geology and landform, habitats, scenic quality, settlement pattern, historic heritage, local vernacular heritage, land-use and tranquillity.	area, taking in Donabate and surrounding environs, the St. Ita's Hospital Complex (an ACA) and Portrane.
Objective GINHO61 – Landscape/Visual Assessment	Require a Landscape/Visual Assessment to accompany all planning applications for significant proposals that are likely to affect views and prospects	<i>Verified Photomontages</i> have been prepared by Modelworks, showing existing, proposed and cumulative views from key viewpoints.

The proposed residential development is consistent with the relevant policies and objectives, as identified. It reflects a considered and integrated approach to green infrastructure, biodiversity, sustainable design, and landscape sensitivity.

The scheme includes a range of measures, such as the use SuDS, tree planting, and biodiversity-friendly open space design. Where necessary, tree/vegetation removal is justified and documented appropriately, and existing natural features of value have been retained and protected wherever feasible.

Open spaces provided as part of the development are multifunctional and accessible, supporting a mix of passive and active recreational uses while also contributing to flood management and ecological enhancement. These spaces are designed with biodiversity in mind, contributing positively to the wider green infrastructure network.

The development has been shaped by a strong awareness of the local landscape character, to ensure the proposals respect and reinforce the sense of place.

FCC provides a number of Green Infrastructure Maps (Map Sheet 14, 15 and 16) alongside the Development Plan. We note the following objectives which are reflected on these maps in **Table 5-7**.

Table 5-7: Green Infrastructure Map Objectives

Map	Objectives
Green Infrastructure 1 - Map 14	Map 14 does not identify any specific objectives with regard to green infrastructure on the subject site.
Green Infrastructure 2 - Map 15	Map 15 does not identify any specific Green Infrastructure in relation to Fingal's Ecological Network.
Green Infrastructure 3 - Map 16	Map 16 does not illustrate any flooding on site as part of the Strategic Flood Risk Assessment SFRA.

Green Infrastructure 1 – Map 14 sets out Landscape Character Areas for the County. In relation to these areas, Policy GINHP9 – Landscape Character sets out:

“Ensure green infrastructure provision responds to and reflects landscape character including historic landscape character, conserving, enhancing and augmenting the existing landscapes and townscape of Fingal which contribute to a distinctive sense of place.”

The subject site, as shown below in **Figure 5-1**, is within Low Lying Agricultural landscape character lands and the Development Plan notes “the main settlements located within the area include Oldtown, Ballyboghil

and Lusk and parts of Malahide and Donabate.”. This landscape character is modest in landscape value and low in landscape sensitivity.

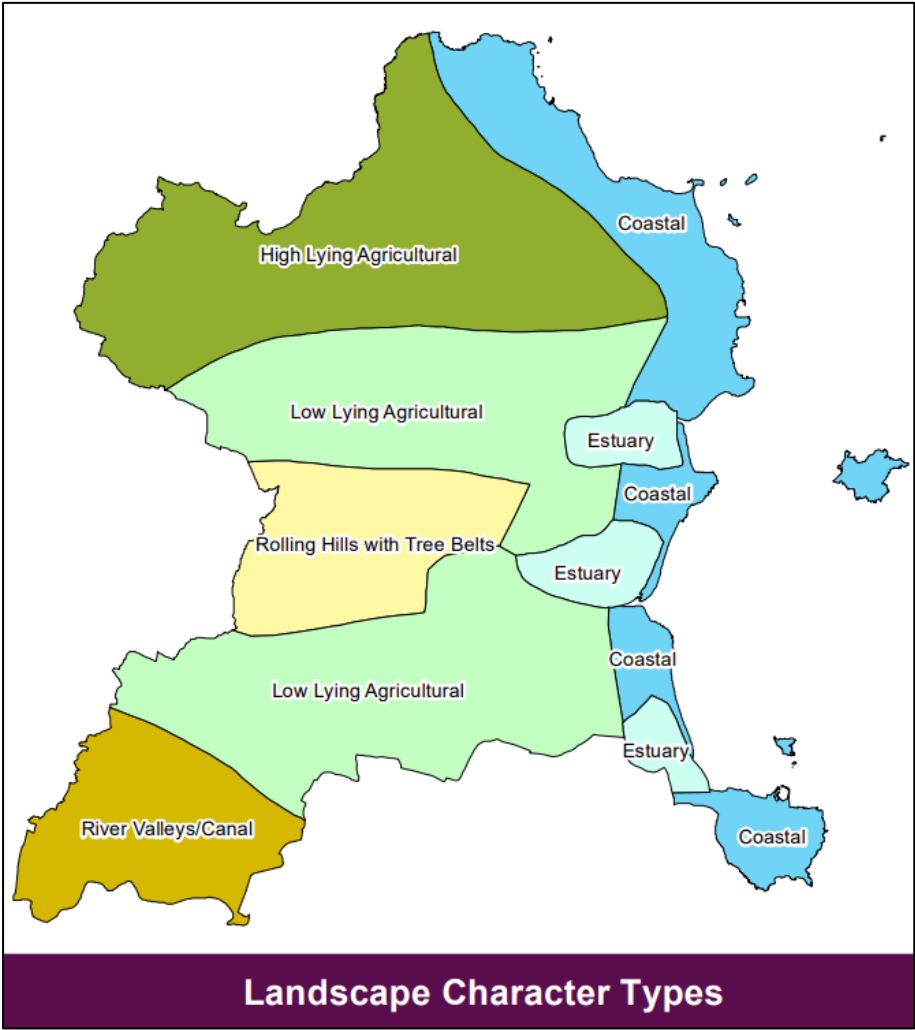


Figure 5-1: Landscape Character Types as per Fingal Development Plan 2023-2029 – indicative location of subject site in red.

Having regard to the above, it is set forth that the proposed development is consistent with the relevant policies and objectives concerning green infrastructure and natural heritage.

5.4.1.8 Heritage, Culture and Arts

The Development Plan clearly outlines the priorities of Fingal County with regard to the preservation, protection and enhancement of heritage, culture and arts, particularly with regard to future proposed development. A portion of the subject site is within the St. Ita’s Hospital Complex ACA, and as such, it is important to have sufficient regard to the policies and objectives related to heritage (particularly architectural heritage) for the proposed development. Relevant policies and objectives in this regard are outlined in Table 5-8.

Table 5-8: Heritage, Culture and Arts Relevant Policies and Objectives

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
Policies		



Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
Policy HCAP14 – Architectural Conservation Areas	Protect the special interest and character of all areas which have been designated as an Architectural Conservation Area (ACA). Development within or affecting an ACA must contribute positively to its character and distinctiveness and take opportunities to protect and enhance the character and appearance of the area and its setting wherever possible. Development shall not harm buildings, spaces, original street patterns, archaeological sites, historic boundaries or features, which contribute positively to the ACA.	A portion of the subject site is within the St. Ita's Hospital Complex Architectural Conservation Area (ACA). As such, the proposed design has considered the architectural vernacular of the existing buildings within the ACA and seeks to positively contribute to the character of the area through complimentary material selection. Please refer to the <i>Architectural Design Statement</i> prepared by MDO for more detailed information regarding the architectural design rationale.
Objectives		
Objective HCAO11 – Impacts of large-scale development	Ensure that proposals for large scale developments and infrastructure projects consider the impacts on the archaeological heritage and seek to avoid them	The proposed development is considered to be large-scale, and has been designed with appropriate consideration to archaeological heritage. Please refer to Chapter 15 of the <i>Environmental Impact Assessment Report</i> prepared by BSM for more detailed information.
Objective HCAO24 – Alteration and Development of Protected Structures and ACAs	Require proposals for any development, modification, alteration, extension or energy retrofitting affecting a Protected Structure and/or its setting or a building that contributes to the character of an ACA are sensitively sited and designed, are compatible with the special character, and are appropriate in terms of the proposed scale, mass, height, density, architectural treatment, layout, materials, impact on architectural or historic features.	A portion of the subject site is within the St. Ita's Hospital Complex ACA, and as such the proposed development within this extent has been design sensitively to integrate with the character of the area, through the use of appropriate material selection, scaling, height, etc. Please refer to the <i>Architectural Design Statement</i> prepared by MDO for more detailed information.
Objective HCAO25 – Architectural Heritage Impact Statement	Require an Architectural Heritage Impact Statement as part of the planning documentation for development that has the potential to affect the relationship between the Protected Structure and any complex of adjoining associated buildings, designed landscape features,	The proposed development does not contain and is not in immediate proximity to any Protected Structures under the Development Plan. Please refer to Chapter 15 of the <i>Environmental Impact Assessment Report</i> prepared by

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
	or designed views or vistas from or to the structure. This particularly relates to large landholdings such as country estates, institutional complexes, and industrial sites where groups of structures have a functional connection or historical relationship with the principal building	BSM for further information with regard to architectural heritage.
Objective HCAO63 – Naming of Residential Schemes	Ensure that the naming of mixed residential and mixed-use schemes reflect local history, folklore and/or place names and are stated in the Irish language.	The proposed naming of streets, areas, etc. will be decided in agreement with FCC following planning consent, which is consistent with the approaches of Phases 1 and 2 of the wider Ballymastone development.
Objective HCAO64 – Townland Names	Encourage the use and promotion of historical and current townland names in the urban and rural environment in both the Irish and English languages, with a view to supporting the provision of townlands' place names markers/signage.	The proposed naming of streets, areas, etc. will be decided in agreement with FCC following planning consent, which is consistent with the approaches of Phases 1 and 2 of the wider Ballymastone development.

The proposed residential development is consistent with the identified policies and objectives, demonstrating a sensitive and respectful approach to its historic and architectural context. It preserves and enhances the character and distinctiveness of the surrounding ACA, St. Ita's Hospital Complex, by carefully considering scale, massing, materials, and design in harmony with the neighbouring existing built environment (please refer to the *Architectural Design Statement* prepared by MDO). The proposed units within the ACA (to the north of the subject site) have been designed with a material palette that is aligned with the materials of the St. Ita's Hospital complex. Please see the *Architectural Design Statement* prepared by MDO for more detailed information regarding the design of the proposed development.

The proposal addresses the potential impact on archaeological and architectural heritage and incorporates relevant assessments, which informs its design. The development will support cultural and historical continuity through the thoughtful integration of local naming conventions, including the use of Irish language and reference to townland names, reinforcing a strong sense of place and community identity (in agreement with FCC).

5.4.1.9 Infrastructure and Utilities

The Development Plan makes provision for consideration of the services available for potential development, whilst also ensuring any proposed development does not preclude future infrastructure development that is planned. The subject site is supported by existing and/or permitted service arrangements (as permitted under Phases 1 and 2 of the wider Ballymastone development). Any relevant policies and objectives from the Development Plan related to infrastructure and utilities are listed in **Table 5-9**.

Table 5-9: Infrastructure and Utilities Relevant Policies and Objectives

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
Policies		
Policy IUP10 – Water Conservation and SuDS	Promote the inclusion of water conservation and SuDS measures in all developments, to reduce the level of surface water run-off, improve water quality and contribute to adaptation to climate change through natural solutions.	The proposed development includes provision of SuDS measures to reduce the level of surface water run-off, improve water quality and contribute to climate change adaptation. Please refer to the <i>Infrastructure Design Report</i> prepared by DBFL and associated drainage and attenuation engineering drawings also prepared by DBFL.
Policy IUP28 – Promote Energy Efficient Development	Promote more energy efficient development through the location of housing and employment along public transport/cycling corridors, where people can choose to use less energy intensive public transport or cycling, rather than being dependent on the car.	The proposed development is cited in close proximity to local bus service, and close to Donabate Railway station. The proposal also includes walking and cycle connections to neighbouring existing areas and roads, and to Phases 1 and 2 of the wider development. Additionally, safe and secure covered cycle parking is provided for all residents, in addition to visitor bicycle parking, to facilitate more sustainable mobility. Please refer to the <i>Traffic and Transportation Assessment</i> and relevant accompanying engineering drawings, all of which is prepared by DBFL.
Objectives		
Objective IUO3 – Water Services Infrastructure	Ensure that all new developments in areas served by a public foul sewerage network connect to the public sewerage system and comply with the requirements of the Uisce Éireann Foul Sewer specification (where applicable).	The proposed development will connect to the public foul sewerage network. This has been agreed with Uisce Éireann (see <i>Statement of Design Acceptance</i> letter from Uisce Éireann). Please refer to the <i>Infrastructure Design Report</i> and the associated drainage engineering drawings prepared by DBFL for further information.

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
Objective IUO4 – Separate Foul and Surface Water Drainage Systems	Require all new development to provide separate foul and surface water drainage systems and to prohibit the connection of surface water outflows to the foul drainage network where separation systems are available, and vice versa (foul to surface), where separation systems are available.	The proposed development includes provision of separate foul and surface water drainage systems. Please refer to the <i>Infrastructure Design Report</i> and associated drainage engineering drawings prepared by DBFL for further detail.
Objective IUO7 – Buffer Zones around Pumping Stations	Establish an appropriate buffer zone around all pumping stations suitable to the size and operation of each station. The buffer zone should be a minimum 35 metres – 50 metres from the noise/odour producing part of the pumping station to avoid nuisance from odour and noise. For small scale developments (less than 15 houses) a smaller buffer zone may be agreed with the Planning Authority.	A foul pumping station is located to the north of the site (permitted under FCC. Reg. Ref. LRD0039/S3 & ABP Reg. Ref. 320885). The proposed development has been designed such that all structures (including their curtilage) at least 35m away from the vent of the station. This setback is noted in the <i>Architectural Design Statement</i> prepared by MDO. Please also refer to relevant drainage engineering drawings (including drawing no. 20003-DBF-XXXX-XX-DR-C01-133002) prepared by DBFL, which indicate where appropriate a line showing the buffer.
Objective IUO11 – SuDS in New Developments	SuDS shall be incorporated into all parts of a development (open spaces, roads, footpaths, private areas), and have regard to the FCC SuDS Guidance Document – Green/ Blue Infrastructure for Development, as amended (Appendix 11), and shall ensure: ■ That the design of SuDS enhances the quality of open spaces and when included as part of any open space provision, it must contribute in a significant and positive way to the design and quality of the open space. ■ Open space areas shall not be dominated by SuDS features. ■ Underground tanked systems, whether concrete or plastic, are the least favoured means for surface water management and shall only be used	The proposed development has been designed to include SuDS features throughout, including in open spaces, roads, footpaths and private areas, and has been design with regard to the FCC SuDS guidance document. Please refer to the <i>Infrastructure Design Report</i> prepared by DBFL, and relevant drawings including drainage and attenuation, also prepared by DBFL.

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
	when green solutions have proven not feasible. See also Appendix 11 (SuDS Guidance Document), and Chapter 14 Development Management Standards (Section 14.20.3 SuDS).	
Objective IUO12 – Green Roofs	Require the use of Green Roofs particularly on apartment, commercial, leisure and educational buildings as part of the overall surface water management strategy for each development, where appropriate.	The proposed development includes the provision of green roofs on the proposed apartment blocks. Please refer to the architectural drawings prepared by MDO relating to the proposed apartment blocks. Please also refer to the <i>Infrastructure Design Report</i> prepared by DBFL.
Objective IUO13 – Surface Water Run-Of	Require that all surface water run-off from new / extended domestic driveways, repaired/ replacement driveways and vehicular entrances (where such development is not exempted from the requirement to obtain planning permission) is managed using SuDS, ensuring no increase in surface water discharges to the public drainage network.	The majority of the proposed private parking spaces associated with the proposed houses are designed to utilise permeable paving to ensure that this does not increase surface water discharge to the street and associated drainage network. Please refer to drawing nos. 20003-DBF-XXXX-XX-DR-C01-133000 (PROPOSED OVERALL DRAINAGE LAYOUT) and 20003-DBF-XXXX-XX-DR-C01-533005 (TYPICAL PRIVATE DRAINAGE DETAILS) prepared by DBFL.
Objective IUO15 – Surface Water Management Plan	Require the preparation of a Surface Water Management Plan as part of all new developments which shall include the following: Identify and assess the existing surface water movements through the development before considering and developing a surface water management system using SuDS, having regard to our Fingal Guidance Document – Green/ Blue Infrastructure for Development, as amended (Appendix 11).	A Surface Water Management Plan has been included as part of the <i>Infrastructure Design Report</i> prepared by DBFL in accordance with relevant guidance.

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
	■ Incorporate SuDS along the route of the water movement to enhance the water quality effects of nature-based systems at the different stages – Treatment Train approach from source to discharge.	
Objective IUO16 – OPW Flood Risk Management Guidelines	Have regard to the OPW Flood Risk Management Guidelines 2009, as revised by Circular PL 2/2014, when assessing planning applications and in the preparation of statutory and non-statutory plans and to require site specific flood risk assessments to be considered for all new developments within the County. All development must prepare a Stage 1 Flood Risk Analysis and if the flooding risk is not screened out, they must prepare a Site-Specific Flood Risk Assessment (SSFRA) for the development, where appropriate.	A <i>Site-Specific Flood Risk Assessment</i> has been prepared by DBFL and included as part of the subject LRD planning application pack.
Objective IUO21 – Precautionary Principle in OPW Guidelines	Require all developments in the County to be designed and constructed in accordance with the 'Precautionary Principle' as detailed in the OPW Guidelines and to minimise the flood risk in Fingal from all potential sources of flooding as far as is practicable, including coastal, pluvial, fluvial, reservoirs and dams, and the piped water system.	The proposed development has been designed (and will be constructed) in accordance with the precautionary principle as detailed in relevant OPW guidelines. Please refer to the <i>Infrastructure Design Report</i> and the <i>Site-Specific Flood Risk Assessment</i> , both prepared by DBFL.
Objective IUO34 – Waste Management in New Developments	Require the provision of appropriate, well designed, accessible space to support the storage, separation and collection of as many waste and recycling streams as possible in all new commercial and residential developments within the County. See also Chapter 14, Development Management Standards (Section 14.20.12: Waste Management)	The proposed development includes provision for waste segregation and storage, either in rear gardens, external bin stores, and internal bin stores depending on the unit type. Please refer to Chapter 19 of the <i>Environmental Impact Assessment Report</i> prepared by BSM, in addition to the <i>Operational Waste Management Plan</i> prepared by AWN, which is included as Appendix 19.2 of the EIAR.

Policy/Objectives Number and Title	Policy/Objective	Consistency of Proposed Development with Policy/Objective
Objective IUO45 – Undergrounding of Utility Infrastructure	Require that the location of local utility services such as electricity, telephone and television cables be located underground wherever possible, and to promote the undergrounding of existing overhead cables and associated equipment, where possible, in the interests of visual amenity and improved public realm	It is proposed that all utilities are to be located underground. Please refer to <i>Utility Report</i> prepared by ENX, which confirms the same.
Objective IUO64 – Design of Lighting Schemes	Require that the design of lighting schemes minimises the incidence of light spillage or pollution into the surrounding environment and new schemes shall ensure that there is no unacceptable adverse impact on neighbouring development, visual amenity and biodiversity in the surrounding areas	The proposed public lighting scheme has been designed to minimise light spillage, whilst ensuring the development is adequately light, without unacceptable adverse impact on neighbouring development, visual amenity and biodiversity. Please refer to the public lighting drawings prepared by ENX, and Chapter 8 of the <i>Environmental Impact Assessment Report</i> prepared by BSM.
Objective IUO65 – Lighting: New Developments	Require that new developments are appropriately lit and that all public and external lighting in new residential and commercial developments use highly energy efficient luminaires, with the use of energy saving strategies (such as dimming in line with nationally agreed tariffs) encouraged.	The subject LRD planning application pack includes a public lighting strategy prepared by ENX. Please refer to the relevant ENX inputs. It is proposed to use 100% energy-efficient lighting (please refer to the <i>Climate Action Energy Statement</i> prepared by ENX.

The proposed development aligns with the relevant policies and objectives by incorporating sustainable, energy-efficient, and climate-resilient design solutions. It prioritises the use of SuDS and green infrastructure to effectively manage surface water, improve water quality, and reduce flood risk, supporting long-term environmental resilience. The development ensures connection to appropriate foul and surface water drainage systems and maintains necessary buffer zones around infrastructure such as the pumping station to the north of the site. Energy efficiency is further promoted through strategic siting along sustainable transport corridors, reducing reliance on private vehicles.

The scheme also includes appropriate waste management facilities and underground utility infrastructure to enhance both environmental performance and visual amenity. Additionally, the development adopts high-quality lighting design that limits light pollution, protects biodiversity, and employs energy-efficient technologies, reinforcing the commitment to sustainability and responsible urban design.

5.4.1.10 Land Use Zoning

The subject site is zoned RA 'Residential Area' under the Development Plan and is highlighted as 'Subject to Local Area Plan' (Donabate LAP 2016, as extended), as shown in **Figure 5-2**. A small portion of the land is zoned RS 'Residential', however there is no development proposed on these lands, which are included within the site boundary for access and service connections.

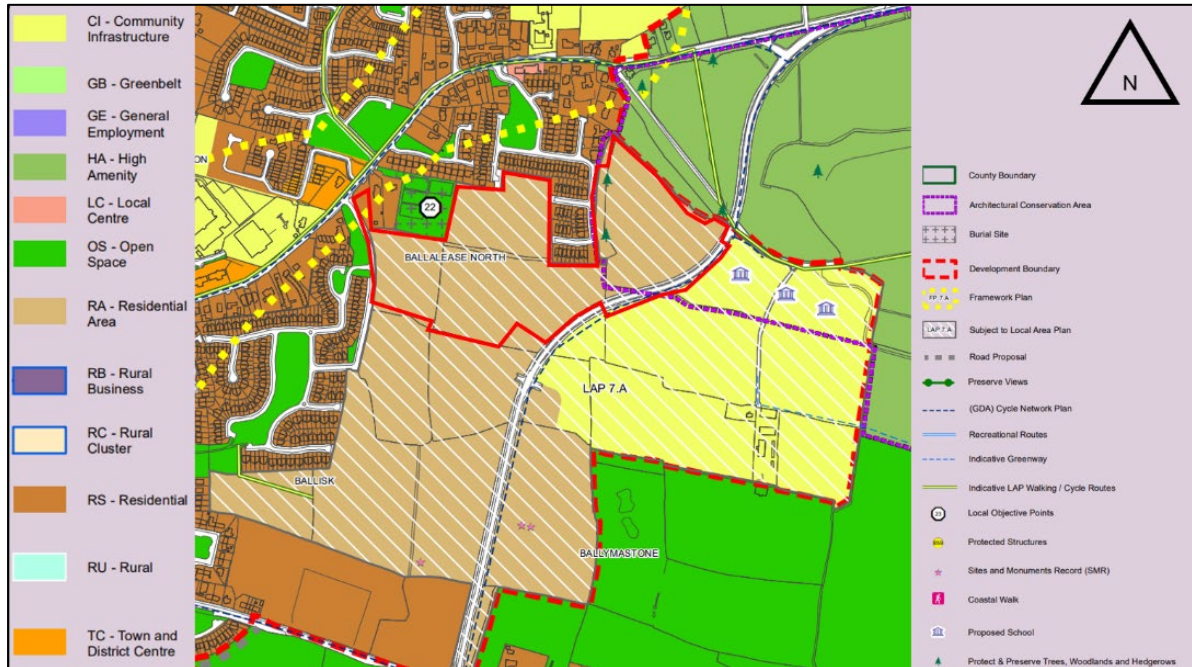


Figure 5-2: Indicative Subject Site (shown in red) Land Use Zoning Map (Source: FCC Sheet No. 7, BSM Annotation)

The objective of RA zoned lands is to “provide for new residential communities subject to the provision of the necessary social and physical infrastructure”. Given the primary purpose of the subject application is to provide for residential uses, the proposed development is clearly consistent with the land-use zoning objective.

Further detail provided by the Development Plan states: “Ensure the provision of high quality new residential environments with good layout and design, with adequate public transport and cycle links and within walking distance of community facilities. Provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.”.

It is also important to note that the north-eastern portion of the site is within the St. Ita’s Hospital Complex ACA. Matters relating to architectural heritage are examined in **Section 5.4.1.8**.

It is also noted that there are 2 no. trees to the north of the site that are marked as ‘Protect and Preserve Trees’. This designation does not have the same statutory backing as a Tree Preservation Order (TPO) under the *Planning and Development Act 2000* (as amended), however, nevertheless these trees will be incorporated into the proposed public open space at this location.

5.4.1.11 Development Management Standards

Chapter 12 of the Development Plan sets out the development management standards for all development proposals. Given the nature of the proposal, the most important and relevant section of the chapter is 14.6 – Design Criteria for Residential Development in Fingal. This is accompanied by Section 14.7 – Apartment Development/Standards and Section 14.8 – Housing Development Standards. These objectives, in addition to any others outside of this section that are deemed relevant are listed in **Table 5-10**.

Table 5-10: Development Management Standards Relevant Objectives

Objective Number and Title	Objective	Consistency of Proposed Development with Objective
Objectives		
Objective DMSO1 – Screening for Appropriate Assessment	Ensure that all plans and projects in the County which could, either individually or in combination with other plans and projects, have a significant effect on a European site or sites are subject to Screening for Appropriate Assessment.	The proposed development has been screened for potential impacts on European sites, and a <i>Natura Impact Statement</i> has been prepared by BSM.
Objective DMSO2 – Screening for Environmental Impact Assessment	Ensure that all development projects within the County that are below the mandatory thresholds for Environmental Impact assessment, which could individually or in combination with other projects have significant effects on the environment are subject to EIA Screening.	An <i>Environmental Impact Assessment Report</i> has been prepared by BSM to accompany the subject LRD planning application.
Objective DMSO4 – Key Principles to consider in the achievement of Healthy Placemaking	■ The design and layout of a development, the public realm and supporting infrastructure should incorporate Universal Design insofar as is feasible. ■ Development should be well-designed and attractive to all users including children, people with disabilities, the elderly as well as accommodating cyclists and pedestrians. ■ The relationship between the proposed scheme and its site context, including between proposed buildings and the adjoining streets, existing site features, pedestrian and cycle paths, as well as levels of active and passive surveillance should be carefully considered. ■ There must be meaningful interaction between individual units within the scheme and the public realm. ■ Creation of areas of distinction where communities can foster a sense of identity, irrespective of scale. ■ Importance of the public realm as an area for passive and active use where the community can congregate. ■ High quality finishing materials to proposed buildings and to the public realms, including seating, lighting, landscaping, tree planting, and green infrastructure.	■ The proposed development has been designed to incorporate universal design insofar as possible. Please refer to the <i>Architectural Design Statement</i> prepared by MDO and the <i>Landscape Strategy Submission</i> prepared by CSR. ■ The development is well-design and attractive to all users, accommodating a wide range of needs. ■ The proposed development has been designed such that comprehensive passive surveillance is provided through the incorporation of active frontage where possible. ■ The proposed development is laid out such that there is appropriate meaningful interaction between units within the scheme, and the public realm. ■ The proposed development is designed with distinctive character to facilitate the fostering of a sense of

Objective Number and Title	Objective	Consistency of Proposed Development with Objective
	■ Consideration of shelter, sunlight/daylight and shadowing. ■ The provision of safe environments for all users where the principles of DMURS are utilised and active travel modes such as walking and cycling are favoured over car use.	identity. Please refer to the <i>Architectural Design Statement</i> prepared by MDO. ■ The public realm includes significant public open space, which is subject to passive surveillance through the incorporation of active frontage, where the community can congregate. It is also proposed to deliver a community space (c. 100 sq.m). ■ High-quality materials have been selected for the proposed development, the palette of which provides visual interest and is in accordance with the character of the St. Ita's Hospital Complex ACA (where appropriate). ■ A <i>Daylight and Sunlight Analysis</i> has been prepared by IN2. ■ The principles of DMURS have been incorporated throughout the proposed development. Please refer to the <i>DMURS Design Statement</i> prepared by DBFL.
Objective DMSO5 – Design Statement	All medium to large scale planning applications (in excess of 5 residential units or 300 sq m of retail/ commercial/office development in urban areas) or as otherwise required by the Planning Authority shall be accompanied by a Design Statement to address the contextual and design issues which have been taken into consideration as part of the scheme. A Design Statement shall: ■ Explain the design principles and design concept of the scheme. ■ Demonstrate how the twelve urban design criteria (as per the Urban Design Manual – A Best Practice Guide) have	An <i>Architectural Design Statement</i> has been prepared by MDO and is included as part of the subject LRD planning application pack. The ADS has been prepared in accordance with objective DMSO5 of the Development Plan.

Objective Number and Title	Objective	Consistency of Proposed Development with Objective
	been considered when designing schemes in urban areas. Each of the twelve criteria is of equal importance and must be considered in an integrated manner. ■ Outline how the development meets the Development Plan Objectives, and the objectives of any Local Area Plan, Masterplan, Framework Plan or other similar Plan affecting the site. ■ Include photographs of the site and its surroundings. ■ Include other illustrations such as photomontages, perspectives, sketches. ■ Outline detailed proposals for open space and ensure the provision of open space is designed in from the beginning when designing a new scheme. ■ Outline a detailed high quality open space and landscape design plan including specifications, prepared by suitably qualified professionals. ■ Outline how Green Infrastructure integrates into the scheme. ■ Demonstrate how the proposed scheme contributes in a positive manner to the public realm and to the local context. ■ Provide detail in relation to all intended finishing materials to be applied throughout the scheme, including an overall materials palette demonstrating suitability for the scheme, its context and the streetscape.	
Objective DMSO19 – New Residential Development	Require that applications for residential developments comply with all design and floor area requirements set out in: ■ Quality Housing for Sustainable Communities – Best Practice Guidelines 2007 ■ Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009, the companion Urban Design Manual – A Best Practice Guide, DEHLG 2009, ■ Sustainable Urban Housing: Design Standards for New Apartments 2020.	The proposed development is in accordance with the relevant guidelines and policies, including S28 Ministerial Guidelines. Please refer to the <i>Housing Quality Audit</i> prepared by MDO.

Objective Number and Title	Objective	Consistency of Proposed Development with Objective
Objective DMSO20 – Schedule of Accommodation	All planning applications for residential development shall be accompanied by a Schedule of Accommodation to demonstrate compliance with housing and apartment standards.	A schedule of accommodation has been prepared and is included as part of the <i>Housing Quality Audit</i> prepared by MDO.
Objective DMSO21 – Floor Plans for Residential Development	Require that all planning applications for residential development include floor plans for each room indicating typical furniture layouts and door swings.	A full set of architectural drawings have been prepared by MDO and included as part of the subject LRD planning application pack.
Objective DMSO22 – Daylight and Sunlight Analysis	Require Daylight and Sunlight analysis for all proposed developments of 50+ units or as required by the Planning Authority, depending on the context of the site and neighbouring property as well as the design of the development.	A <i>Daylight and Sunlight Analysis</i> has been prepared by IN2 and included as part of the subject LRD planning application pack.
Objective DMSO23 – Separation Distance	A separation distance of a minimum of 22 metres between directly opposing rear first floor windows shall generally be observed unless alternative provision has been designed to ensure privacy. In residential developments over three-storeys in height, minimum separation distances shall be increased in instances where overlooking or overshadowing occurs.	The separation distances provided between units is in accordance with relevant planning guidance and policy, including S28 Ministerial Guidelines. Please refer to the <i>Architectural Design Statement</i> and set of architectural drawings prepared by MDO.
Objective DMSO26 – Separation Distance between Side Walls of Units	Ensure a separation distance of at least 2.3 metres is provided between the side walls of detached, semi-detached and end of terrace units. (Note: This separation distance may be reduced on a case-by-case basis in relation to infill and brownfield development which provides for the regeneration of under-utilised lands and subject to the overall quality of the design and the schemes contribution to the streetscape. A statement demonstrating design mitigation and maintenance arrangements shall be submitted in such cases)	Appropriate separation distances have been provided between units in accordance with all relevant policies, objectives and guidelines. Please refer to the relevant architectural inputs prepared by MDO for more detailed information.
Objective DMSO27 – Minimum Private Open Space Provision	Ensure a minimum open space provision for dwelling houses (exclusive of car parking area) as follows: 3 bedroom houses or less to have a minimum of 60 sq. m. of private open	The proposed development has been designed to ensure that all houses are provided with appropriate private open space per Objective DMSO27. Please

Objective Number and Title	Objective	Consistency of Proposed Development with Objective
	space located behind the front building line of the house. Houses with 4 or more bedrooms to have a minimum of 75 sq. m. of private open space located behind the front building line of the house. Narrow strips of open space to the side of houses shall not be included in the private open space calculations	refer to the <i>Landscape Strategy Submission</i> prepared by CSR.
Objective DMSO51 – Minimum Public Open Space Provision	Require a minimum public open space provision of 2.5 hectares per 1000 population. For the purposes of this calculation, public open space requirements are to be based on residential units with an agreed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.	Please refer to the <i>Landscape Strategy Submission</i> prepared by CSR, which responds to Objective DMSO51 in more detail.
Objective DMSO52 – Public Open Space Provision	Public open space shall be provided in accordance with Table 14.12. ¹	15.3% of the net site has been provided as public open space. Please refer to drawing no. 19164-2-3121 (Public Open Space, Communal Open Space & SUDS) prepared by CSR.
Objective DMSO68 – Playground Facilities within Residential Development	Provide appropriately scaled children's playground facilities within residential development. Playground facilities shall be provided at a rate of 4 sq m per residential unit. All residential schemes in excess of 50 units shall incorporate playground facilities clearly delineated on the planning application drawings and demarcated, built and completed, where feasible and appropriate, in advance of the sale of any units.	A public playground is proposed for inclusion as part of SP05, which is a small park at the centre of the proposed development. Other play spaces and equipment have been provided elsewhere within the site. Please refer to drawing nos. 19164-2-3138 (Play Spaces) and 19164-2-3139 (Play Spaces) prepared by CSR.
Objective DMSO69 – Requirements for Equipped Playgrounds	Ensure that in the instance of an equipped playground being included as part of a specific facility, it shall occupy an area of no less than 0.02 hectares. A minimum of one piece of play equipment shall be provided for every 50 sq. m of playground.	The areas of the proposed play spaces are detailed in drawing nos. 19164-2-3138 (Play Spaces) and 19164-2-3139 (Play Spaces) prepared by CSR and are in accordance with the requirements of Objective DMSO69.

¹ 12% - 15% of site area for new residential development on greenfield sites/LAP lands.

Objective Number and Title	Objective	Consistency of Proposed Development with Objective
Objective DMSO71 – Overshadowing of Private Open Space	Ensure private open spaces for all residential unit types are not unduly overshadowed.	The layout of the proposed development has been designed such that it ensures private amenity space is not unduly overshadowed.
Objective DMSO72 – Boundary Treatment to Private Open Space	Ensure boundary treatment associated with private open spaces for all residential unit types is designed to protect residential amenity and visual amenity.	The proposed boundary treatments are detailed in drawing no. 19164-2-3123 (Boundary Treatment Plan) prepared by CSR.
Objective DMSO74 – Screening of Private Open Space	Require balconies, ground floor private open space, roof terraces or winter gardens be suitably screened in a manner complimenting the design of the building so as to provide an adequate level of privacy and shelter for residents.	The proposed development provides appropriate privacy screening in accordance with relevant guidelines and policies. Please refer to the <i>Architectural Design Statement</i> prepared by MDO and the <i>Landscape Strategy Submission</i> prepared by CSR.
Objective DMSO78 – Community and Social Infrastructure Audit	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. ■ 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.	A <i>Community and Social Infrastructure Report</i> has been prepared by BSM to accompany the subject LRD planning application, which has been prepared in accordance with Objective DMSO78 and commentary received from FCC (S247 meeting and LRD opinion). A community space is proposed within the envelope of the proposed apartment building to the west of the subject site (c. 100 sq.m).

Objective Number and Title	Objective	Consistency of Proposed Development with Objective
	Where new community facilities are required, they shall have regard to Objective DMSO79 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, parking, noise or loss of privacy of adjacent resident. ■ Community facilities shall be provided in conjunction with residential/mixed use development. ■ Community facilities shall be accessible by a range of travel modes with an emphasis on walking, cycling and public transport use, while providing appropriate car parking facilities to meet anticipated demand of non-local visitors to the centre.	
Objective DMSO79 – Applications for Childcare Facilities	Any application for childcare facilities shall have regard to the following: ■ Suitability of the site for the type and size of facility proposed. ■ Adequate sleeping/rest facilities. ■ Adequate availability of indoor and outdoor play space. ■ Convenience to public transport nodes. ■ Safe access and convenient off-street car parking and/or suitable drop-off and collection points for customers and staff. ■ Local traffic conditions. ■ Intended hours of operation.	The proposed crèche has been designed with regard to the appropriate sizing (per relevant guidelines). The proposed facility includes adequate sleeping/rest facilities, indoor and outdoor play space. The proposed crèche is cited in close proximity a nearby bus stop, which is served by the 33b, 33d, 33t and 33e (please refer to the <i>Traffic and Transportation Assessment</i> prepared by DBFL) and is within reasonable proximity to Donabate Railway Station. The crèche is sited in a such a location to allow for safe pick up and drop off during the hours of operation.
Objective DMSO109 – Bicycle Parking	Ensure that all new development provides high quality, secure and innovative bicycle parking provision in accordance with the bicycle parking standards set out in Table 14.17 and the associated design criteria for bicycle parking provision set out in this Plan,	Sufficient cycle parking has been provided to meet the needs of residents and visitors. Please refer to the <i>Traffic and Transportation Assessment</i> prepared by DBFL for more

Objective Number and Title	Objective	Consistency of Proposed Development with Objective
	where feasible, practical and appropriate, having regard to local, national and international best practice.	detailed information with regard to the proposed cycle provision.
Objective DMSO113 – Traffic and Transport Assessment	Require the provision of a Traffic and Transport Assessment where new development is likely to have a significant effect on travel demand and the capacity of the surrounding transport network including the road network and public transport services network.	A <i>Traffic and Transportation Assessment</i> has been prepared by DBFL and accompanies the subject LRD planning application pack.
Objective DMSO124 – Integrated Green Infrastructure Plan	Require the submission of an Integrated Green Infrastructure Plan as part of planning applications for residential developments over 50 units and all commercial developments over 2000 sqm.	A Green Infrastructure Plan (drawing no. 19164-2-0121) has been prepared by CSR.
Objective DMSO125 – Management of Trees and Hedgerows	Protect, preserve and ensure the effective management of trees and groups of trees and hedgerows.	The proposed development seeks to protect, preserve and effectively manage existing trees and hedgerows. Please refer to the <i>Landscape Strategy Submission</i> and drawing no. 19164-2-3120 (Vegetation Retention and Removal) prepared by CSR.
Objective DMSO127 – Use of Native Species in New Developments	Require the use of native species where appropriate in new developments in consultation with the Council.	The proposed development landscaping includes extensive planting, including native species, as outline in the <i>Landscape Strategy Submission</i> and drawing nos. 19164-2-3171 (Planting Strategy) and 19164-2-3172 (Tree Planting Strategy) prepared by CSR.
Objective DMSO129 – Tree Selection	Consider in tree selection the available rooting area and proximity to dwellings or business premises particularly regarding shading of buildings and gardens.	The trees selected for use as part the proposed development landscaping have been carefully considered regarding rooting and structure proximity by the Design Team landscape architects.
Objective DMSO131 – Street Tree Planting Plans	Street tree planting plans shall accompany developments over 50 units. Constructed tree pits will be required where trees are planted in hard surfaces and grass verges	It is proposed to include the planting of street trees as part of the proposed development. Please refer to drawing no.

Objective Number and Title	Objective	Consistency of Proposed Development with Objective
	less than 1.2m wide. These plans will include the location of each constructed tree pit of a minimum rooting volume of 16 cubic metres, lamp standards and underground services. The location of tree planting in proximity to built features including footpaths must refer to BS5837:2012 Trees in Relation to Design, Demolition and Construction – Recommendations. The width of grass verges where tree planting is proposed must be labelled on landscape plans.	19164-2-3172 (Tree Planting Strategy) prepared by CSR which has been designed in accordance with relevant guidelines and standards. Please refer to the landscape drawing pack prepared by CSR for additional information and dimensions.
Objective DMSO134 – Site Summary of Specimen Removal, Retention and Planting	Regardless of development size or type, applicants must submit an overall site summary quantifying and detailing the following: “ tree and hedgerow removal; “ tree and hedgerow retention; and “ new tree and hedgerow planting. This information will be submitted in a digital format agreed with the Council to allow amalgamation and reporting on tree and hedgerow cover within the County over time	Drawing nos. 19164-2-3120 (Vegetation Retention and Removal), 19164-2-3171 (Planting Strategy) and 19164-2-3172 (Tree Planting Strategy) have prepared by CSR and provide relevant details.
Objective DMSO136 – Tree Selection within Developments	Tree planting within developments shall adhere to the 30:20:10 rule in relation to tree selection in order to prevent an over reliance on certain genera or species in the existing stock and to combat climate change. Species and varieties will be selected to meet the requirements of the 30:20:10 rule – no more than 30% of trees from any one family, 20% from a single genus or 10% from a single species.	The species selected for the proposed landscaping have considered the criteria set by Objective DMSO136. Please refer to the <i>Landscape Strategy Submission</i> and drawing nos. 19164-2-3171 (Planting Strategy) and 19164-2-3172 (Tree Planting Strategy) prepared by CSR.
Objective DMSO162– Landscape / Visual Assessment	Require a landscape/Visual assessment to accompany all planning applications for significant proposals that are likely to affect views and prospects.	A <i>Verified Photomontage</i> booklet has been prepared by Modelworks and are considered in the <i>Environmental Impact Assessment Report</i> prepared by BSM.
Objective DMSO184 – Architectural Heritage Impact Assessment	Where necessary, the Planning Authority shall require a detailed Architectural Heritage Impact Assessment for an application for works to a Protected Structure. This shall be carried out in accordance with Table 14.23 and Appendix B of the Department of the Arts Heritage	Please refer to Chapter 15 of the <i>Environmental Impact Assessment Report</i> prepared by BSM, which considers cultural heritage, archaeology and architectural heritage.

Objective Number and Title	Objective	Consistency of Proposed Development with Objective
	and Gaeltacht's Architectural Heritage Protection Guidelines for Planning Authorities.	
Objective DMSO187 – Planning Applications within an ACA	All planning applications for works in an Architectural Conservation Area shall have regard to the information outlined in Table 14.24 ² .	The proposed development, particularly the portion of the subject site with the St. Ita's Hospital Complex ACA, has been designed with careful regard to the architectural character and heritage of the area. Please refer to the <i>Architectural Design Statement</i> prepared by MDO.
Objective DMSO202 – SuDS	SuDS shall incorporate nature-based solutions and have regard to the objectives set out in Fingal's Guidance Document – Green/ Blue Infrastructure for Development, as amended. (Appendix 11).	The proposed development incorporates the objectives set out in the relevant guidance. Please refer to the <i>Infrastructure Design Report</i> prepared by DBFL.
Objective DMSO203 – FCC SuDS Guidance Document	SuDS shall be incorporated into all parts of a development (open spaces, roads, footpaths, private areas), and have regard to the FCC SuDS Guidance Document – Green/ Blue Infrastructure for Development, as amended (Appendix 11), and shall ensure: ■ That the design of SuDS enhances the quality of open spaces and when included as part of any open space provision, it must contribute in a significant and positive way to the design and quality of the open space. ■ Open space areas shall not be dominated by SuDS features. ■ Underground tanked systems, whether concrete or plastic, are the least favoured means for surface water management and shall only be used when green solutions have proven not feasible. See also Appendix 11 (SuDS Guidance Document) and Chapter 11, Infrastructure and Utilities (Section 11.5.2: Surface Water and Flood Risk Management).	SuDS features are incorporated throughout the proposed development including open spaces, roads, footpaths and private areas, having regard to the FCC SuDS Guidance Document. Please refer to drawing no. 19164-2-3121 (Public Open Space, Communal Open Space & SUDS) prepared by CSR, and the <i>Infrastructure Design Report</i> prepared by DBFL.

² Refers to Direction for Proposed Development within Architectural Conservation Areas.

Objective Number and Title	Objective	Consistency of Proposed Development with Objective
Objective DMSO235 – Communal Refuse Storage Provision	In the case of communal refuse storage provision, the collection point for refuse should be accessible both to the external collector and to the resident and be secured against illegal dumping by non-residents. In the case of individual houses, the applicant shall clearly show within a planning application the proposed location and design of bin storage to serve each dwelling, and having regard to the number of individual bins required to serve each dwelling at the time of the application and any possible future requirements for refuse storage/collection. The following criteria will be considered in the assessment of the design and siting of waste facilities and bring facilities: ■ The location and design of any refuse storage or recycling facility should ensure that it is easily accessible both for residents and/or public and for bin collection, be insect and vermin proofed, will not present an odour problem, and will not significantly detract from the residential amenities of adjacent property or future occupants. ■ Provision for the storage and collection of waste materials shall be in accordance with the guidelines for waste storage facilities in the relevant Regional Waste Management Plan and the design considerations contained in Section 4.8 and 4.9 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, DHLGH 2020. ■ Refuse storage for houses should be externally located, concealed / covered and adequate to cater for the size and number of bins normally allocated to a household. For terraced houses, the most appropriate area for bins to be stored is to the front of the house, which should be located in well-designed enclosures that do not detract from visual amenity.	The communal refuse storage and collection areas have been designed to ensure they are externally accessible for waste collection operatives, whilst being secure to prevent illegal dumping by non-residents. Please refer to the plan drawings relating to the proposed apartment and duplex blocks prepared by MDO, and additionally drawing nos. 23010-MDO-BX23-XX-DR-A01-070001 (Block BX23 - BZ08 Bin & Bicycle Store - Plans, Elevations & Section) and 23010-MDO-BX24-XX-DR-A01-070001 (Block BX24 - Bin Store - Plans, Elevations & Section). Please also refer to Chapter 19 of the <i>Environmental Impact Assessment Report</i> prepared by BSM, in addition to the <i>Operational Waste Management Plan</i> prepared by AWN, which is included as Appendix 19.2 of the EIAR.

Objective Number and Title	Objective	Consistency of Proposed Development with Objective
	- All applications shall clearly identify the waste storage and collection points and detail the anticipated waste collection schedule having regard to the impact on road users both within the development and the surrounding area. - Access to private waste storage in residential schemes should be restricted to residents only.	
Objective DMSO236 – Segregation and Collection of Waste	Ensure all new large-scale residential and mixed-use developments include appropriate facilities for source segregation and collection of waste.	Please refer to Chapter 19 of the <i>Environmental Impact Assessment Report</i> prepared by BSM, in addition to the <i>Operational Waste Management Plan</i> prepared by AWN, which is included as Appendix 19.2 of the EIAR. The proposed development is designed to ensure all residents have appropriate facilities for source segregation and collection of waste.
Objective DMSO239 – Refuse Storage Areas	Ensure all new residential schemes include appropriate design measures for refuse storage areas, details of which should be clearly shown at pre-planning and planning application stage. Ensure refuse storage areas are not situated immediately adjacent to the front door or ground floor window, unless adequately screened or other such mitigation measures are provided.	Refuse storage areas have been clearly indicated on all relevant drawings and have been situated such that they are not immediately adjacent to front doors or ground floor windows unless adequately screened.
Objective DMSO241 – Construction and Demolition Waste Management Plan	Require that Construction and Demolition Waste Management Plans be submitted as part of any planning application for projects in excess of any of the following thresholds: - New residential development of 10 units or more. - New developments other than above, including institutional, educational, health and other public facilities, with an aggregate floor area in excess of 1,250 sqm. - Demolition / renovation / refurbishment projects generating in excess of 100m³ in volume of C&D waste.	A <i>Preliminary Construction & Environmental Management Plan</i> has been prepared by DBFL and submitted as part of the subject LRD planning application pack. This document will be developed in consultation with FCC post-planning consent.

Objective Number and Title	Objective	Consistency of Proposed Development with Objective
	Civil engineering projects in excess of 500m³ of waste materials used for development of works on the site.	
Objective DMSO242 – Guidance for Construction and Demolition Waste Management Plans	Require that Construction and Demolition Waste Management Plans include the following: - Hours of operation. - Construction/phasing programme. - Traffic Management Plan including employee parking and movements. - Noise, Vibration, Air Quality and Dust Monitoring and Mitigation Measures. - Details of any construction lighting including appropriate mitigation measures for lighting specifically designed to minimise impacts to biodiversity, including bats. - The management of construction and demolition waste included as part of a Construction and Demolition Waste Management Plan. - Containment of all construction-related fuel and oil within specially constructed bunds to ensure that fuel spillages are fully contained (such bunds shall be roofed to exclude rainwater). - A water and sediment management plan, providing for means to ensure that surface water runoff is controlled such that no silt or other pollutants enter local water courses or drains.	A <i>Preliminary Construction & Environmental Management Plan</i> has been prepared by DBFL and submitted as part of the subject LRD planning application pack. This document will be developed in consultation with FCC post-planning consent. The preliminary plan has been developed considering the items noted under Objective DMSO242 of the Development Plan.
Objective DMSO248 – Design of Lighting Schemes	Require that the design of lighting schemes minimises the incidence of light spillage or pollution into the surrounding environment. New schemes shall ensure that there is no unacceptable adverse impact on neighbouring residential or nearby properties; visual amenity and biodiversity in the surrounding areas.	The proposed public lighting scheme has been designed such that it minimises the incidence of light spillage or pollution into the surrounding environment. The potential impacts of public lighting are considered in Chapter 8 of the <i>Environmental Impact Assessment Report</i> prepared by BSM.
Objective DMSO261 – Climate Action Energy Statements	All new developments involving 15 residential units and/or more than 1,000 sq. m. of commercial floor space, or as otherwise required by the Planning	A <i>Climate Action Energy Statement</i> has been prepared by ENX and submitted as part of the

Objective Number and Title	Objective	Consistency of Proposed Development with Objective
	Authority, will be required to submit a Climate Action Energy Statement as part of the overall Design Statement to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development.	subject LRD planning application pack.

There is an extensive number of objectives related to development management, which ensure that any proposed development is designed to a high standard to provide a high level of residential amenity. The proposed development has been designed taking these objectives into account, ensuring consistency throughout, in relation to matters ranging from the residential mix, floor area, childcare and community infrastructure provision, accompanying assessments and documentation, landscaping, climate action and environmental matters, etc.

5.4.2 Donabate Local Area Plan 2016 (as extended)

The subject site is identified as Ballymastone in the *Donabate Local Area Plan 2016* (the LAP), which was adopted in March 2016 by FCC. In March 2021, the Council Elected Members approved the extension of the life of the LAP for an additional five years, through to March 2026. The LAP sets out a detailed strategy for the development of the landbanks zoned for residential development in the Donabate area under the Development Plan, and the site is subject to the contents of the LAP.

The LAP provides for a phased development of the lands, with a portion of the subject site at Ballymastone forming part of the final phase (Phase 3) lands, whose development is predicated on the completion and operation of the DDR and the growth of the settlement in general. The DDR has been delivered, allowing these lands to be developed.

It is noted that Strategic Environmental Assessment (SEA), AA and Flood Risk Assessment (FRA) have been carried out in respect of the LAP.

The proposed development has been designed in accordance with the LAP, and where the LAP does not provide details or contrasts with other guidelines, the *Fingal Development Plan 2023-2029* has been considered (see **Section 5.4.1**).

5.4.2.1 Vision and Development Strategy

The vision for the Donabate LAP is as follows:

“The ambition of the LAP is to provide for the structured development of the identified new residential areas of Donabate such that they integrate into the established village and support the continued growth of a vibrant and attractive town for existing and future residents. New development will be accompanied by the required community, educational, transport, drainage and recreational infrastructure to ensure the protection and enhancement of local amenities and the continued growth of local services in Donabate.” (page 1).

With the aim of delivering this vision, the LAP also includes the following strategic aims for the development of Donabate:

- *“Provide a framework for a growing population with phased development of new housing delivered in tandem with supporting community and physical infrastructure.*

- *Support Donabate Village as the primary location for commercial, retail, community and cultural development serving the Town and Peninsula generally.*
- *Provide infrastructural investment to address traffic, pedestrian safety and movement challenges including the early delivery by FCC of a new road & bridge providing an alternative access to Donabate and Portrane.*
- *Protect and enhance the existing natural amenities of Donabate and improve access to established local amenity areas through the creation of a network of designated green routes.” (page 1).*

The third of the above-listed strategic aims relates to the DDR, which was proposed to “*serve the new development lands to the south and east of the existing settlement (Corballis East and Ballymastone)*” (page 25). The DDR was completed in 2020 and thus this strategic aim can be considered as achieved. The DDR bounds the subject site to the east, and the proposed development will be accessed from the east from the DDR.

The LAP states that the lands earmarked for residential development at Donabate have a capacity of approx. 4,000 no. units. It is noted that this figure also includes for two small parcels of residential zoned lands that are outside of the LAP boundaries.

There are four distinct landbanks which are the subject of the LAP:

1. Corballis;
2. Ballymastone ;
3. Rahillion; and
4. Turvey.

These development lands have a combined area of approx. 138ha. The site of the proposed project falls within the Ballymastone lands. The extent of the lands is shown in **Figure 5-3**. In terms of the urban design strategy, it is stated that the “*A key aim is to ensure integration between the new LAP areas and the existing community, in an effort to create a network of inter-connected areas and to strengthen and enhance the Village core as the primary focus in Donabate*” (page 2). The LAP seeks to deliver a range of house types and styles, catering for all members of society at all life stages, and providing a ‘sustainable social mix’. It is envisaged that building heights will be predominantly two-storeys (with single storey units appropriate at certain locations) but also noted that “*Increased heights may be appropriate at locations where higher buildings would make a contribution to the streetscape or would provide overlooking of open space / recreation areas (i.e. closest to the Village and Railway Station)*” (page 2).



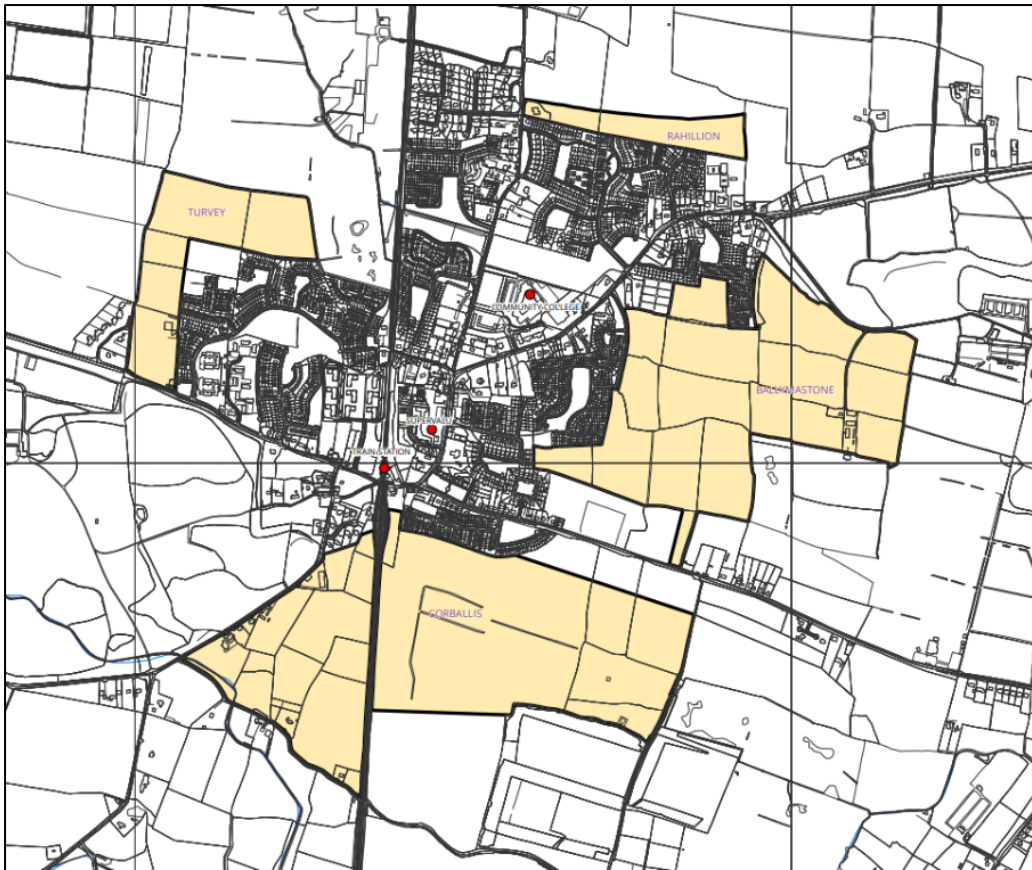


Figure 5-3: Donabate LAP lands (Donabate Local Area Plan 2016 as extended, Figure 2.1)

It is noted that lands in the eastern portion of the Ballymastone lands (which fall outside the site of the proposed development) are used by St. Patrick's (St. Pat's) GAA Club and St. Ita's Football Club.

2 no. future school sites are designated for the Ballymastone development lands – one in the southern section and another in the north-eastern section (to form part of a planned educational / recreational campus, outside of the site of the proposed development). However, it is noted that, in the Ballymastone Framework Plan (2018), the school objective as per the LAP, is no longer planned at this location (and this is reflected in the current Development Plan). This school is instead programmed to be provided within the Educational Hub to the east of the proposed development. As shown on the Donabate Map Sheet 7 of the *Fingal Development Plan 2023-2029*, 3 no. schools are proposed within the Educational Hub (see **Figure 5-2**).

Noting the above, the proposed development is in accordance with the Vision and Development Strategy of the LAP, and seeks to develop a portion of the residential lands, given that the DDR has been delivered, in accordance with the principles of sustainable development and proper planning.

5.4.2.2 Movement and Transport Strategy

The LAP considers the transport options available to existing and future residents of Donabate, including the existing bus and rail service, and planned improvements. Since the adoption of the LAP, the DART+ Coastal North project has progressed, with a Railway Order (RO) submitted to An Coimisiún Pleanála by Iarnród Éireann (ABP Reg. Ref. 320164), which has been recently granted. Enhanced railway services are expected to begin in 2026/2027, with the introduction of new battery-electric rolling stock, which will allow for DART-style services in advance of the construction of overhead electrification infrastructure.

The provision of the Donabate Distributor Road (DDR) also forms a key part of the transportation and movement strategy of the LAP. The DDR has now been constructed, facilitating the development of the Ballymastone lands.

With regard to internal road and street layout, the LAP states the following regarding the lands at Ballymastone:

“The Ballymastone lands will evolve to connect coherently to existing and proposed road infrastructure in the vicinity. Connections will be required between residential areas and the proposed Educational and Recreational Campus including a new Campus Link Road from the west. Street networks that are orthogonal in nature are the most effective in terms of permeability and legibility. Important strategic pedestrian and cycleway connections will be necessary from Ballymastone eastwards to St. Ita’s Demesne and westwards to the Spires estate to maximise permeability to the Village.” (page 28).

The proposed development has been designed with permeability for pedestrians and cyclists in mind, particularly toward the town centre to the west of the subject site. The proposed development will also have good connectivity to the permitted development to the south (Phases 1 and 2) and to the existing residential areas to the west/northwest. Connections to the DDR will also facilitate movement to the permitted Recreation Campus to the east, and the future educational campus.

More details regarding transportation and movement for the proposed development can be found in the *Traffic and Transportation Assessment* prepared by DBFL.

5.4.2.3 Green Infrastructure

The LAP seeks to create a green infrastructure network of high-quality amenity and other green spaces that permeate through the plan lands, while incorporating and protecting the natural heritage and biodiversity value of the lands. The LAP sets out a strategy and series of objectives.

Some relevant objectives include are outlined in **Table 5-11**.

Table 5-11: Donabate LAP 2016-2022 Green Infrastructure Objectives

Objectives Number	Objective	Consistency of Proposed Development with Objective
Objective 4.6	Provide appropriately scaled children’s playground facilities and youth activity spaces within residential development, having regard to relevant Fingal County Development Plan policy, Department of Environment guidance and best practice.	The proposed development includes several play spaces for children, including a playground in SP05 toward the centre of the site. Please refer to drawing nos. 19164-2-3121 (Public Open Space, Communal Open Space & SUDS), 19164-2-3138 (Play Spaces) and 19164-2-3139 (Play Spaces), all of which are prepare by CSR. Within SP05, it is also proposed to provide a ‘teen zone’, which is shown on drawing no. 19164-2-3131 (Public Open Space – Small Parks) prepared by CSR.
Objective 4.7	To provide a large multi-functional playground at Ballymastone with a range of facilities to cater for a variety of age-groups (toddlers to teens).	The permitted and proposed Ballymastone developments (Phases 1,2 and now 3) incorporate a series of connected parks and playgrounds. It is proposed to include a large playground within SP05, which is located toward the centre of the site.

Objectives Number	Objective	Consistency of Proposed Development with Objective
		It is also proposed to provide a multi-use games area, outdoor fitness equipment and a 'teen zone'. Phase 1 has seen the development to the large Baile Uisce Park, incorporating significant play areas. Please refer to drawing no. 19164-2-3138 (Play Spaces) and drawing no. 19164-2-0101 (Overall Landscape Master Plan) prepared by CSR, and their Landscape Strategy Submission.
Objective 4.10	Provide an integrated network of open spaces, pocket parks and pedestrian / cycle routes through the implementation of the Open Space Strategy outlined in the LAP.	A significant amount of public open space is provided as part of the proposed development, which consists of c. 15.3% of the net site area, which exceeds the quantity required under the Development Plan, and is in accordance with the Open Space Strategy of the LAP. Please refer to drawing no. 19164-2-3121 (Public Open Space, Communal Open Space & SUDS), the <i>Landscape Strategy Submission</i> prepared by CSR and any other relevant landscape drawings also prepared by CSR.
Objective 4.11	Require a detailed high quality open space and landscape design plan including specifications, prepared by suitably qualified professionals, to be submitted with all planning applications for developments in excess of 10 residential units.	A <i>Landscape Strategy Submission</i> has been prepared by CSR and is submitted as part of the subject LRD planning application.

The *Landscape Strategy Submission* prepared by CSR (and accompanying drawings) and the *Architectural Design Statement* (and accompanying drawings) prepared by MDO set out the public and private open space provision and the design intent of high-quality public realm provision.

5.4.2.4 Landscape

The LAP carefully considers the nature of the existing landscape, and how future development might impact the landscape. Generally, it is noted that development should be sympathetic to the receiving environment, ensuring that protected views are not impacted adversely and that existing flora and fauna are not displaced. This includes minimising the loss of trees and hedgerows.

Additionally, the St. Ita's Hospital Complex ACA is considered, which covers a portion of the subject lands, to the north.

Details regarding the proposed developments landscaping and architectural design can be found in the *Landscape Strategy Submission* prepared by CSR and the *Architectural Design Statement* prepared by MDO. The proposed development has been designed to thoughtfully integrate into the receiving environment, using high-quality materials and extensive landscaping and planting, all whilst retaining, preserving and protecting existing trees and hedgerows insofar as possible.

5.4.2.5 Community Infrastructure

The LAP notes that provision is made for a Recreational and Educational Hub at Ballymastone. To date, the Recreational Hub has been permitted (see **Section 3.2.12**) and is awaiting construction by FCC. A *Community and Social Infrastructure Report* has been prepared by BSM, examining the existing and permitted community infrastructure, ensuring there is sufficient capacity for the proposed development, to support a thriving and sustainable community.

The proposed development includes public open space, play areas and a crèche with an internal area of c. 646 sq.m and a community space of c. 100 sq.m.

5.4.2.6 Water and Drainage

The LAP notes that the site is served by both water mains and wastewater services (which are treated at the nearby Portrane WWTP, south of the St. Ita's complex). Regarding drainage, the site is split between drainage to the Beaverstown Stream, and the Ballalease Stream. The catchment areas per the LAP are shown in **Figure 5-4**.

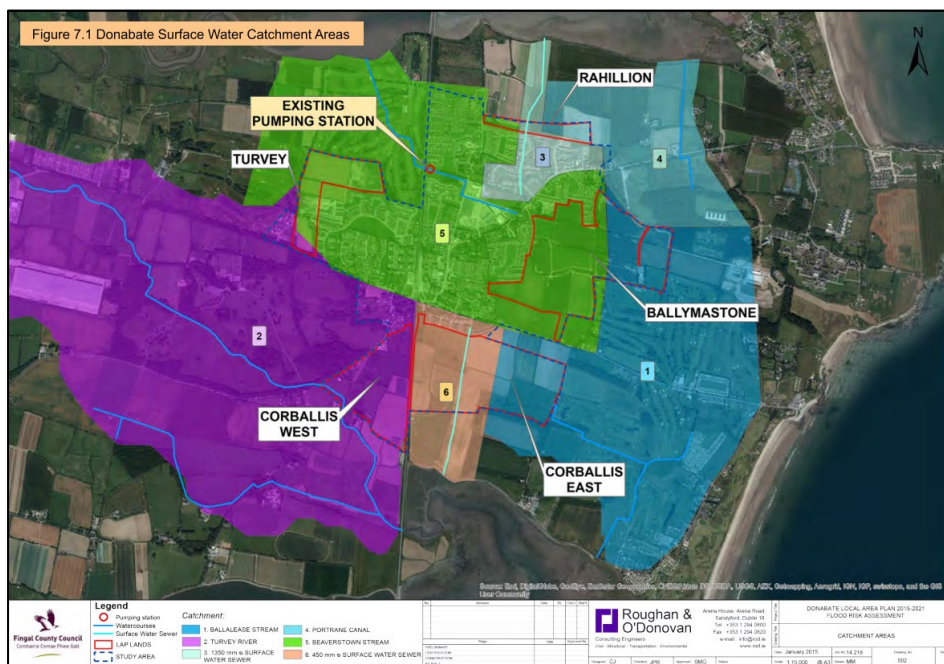


Figure 5-4: Drainage Catchment Areas (Donabate LAP 2016-2022, as extended)

The LAP notes that new development in Ballymastone should prioritise the implementation of SuDS to better manage surface water drainage. The proposed development integrates SuDS throughout the site, as outlined in the *Infrastructure Design Report* and *Site-Specific Flood Risk Assessment*, both prepared by DBFL, and the *Landscape Strategy Submission*, prepared by CSR. Further detail regarding the SuDS features proposed can be found in the accompanying engineering and landscape drawings prepared by DBFL and CSR respectively. The proposed development is consistent with the water and drainage element of the LAP.

The LAP notes that an Urban Design Appraisal should accompany each planning application for the lands governed by the LAP. This relates to the contents of the *Urban Design Manual – A Best Practice Guide*. Such appraisal is contained in the *Architectural Design Statement* prepared by MDO.

The proposed development has a density of c. 42.5 dwellings per hectare (dph) in the portion of the site within 1km of the railway station, and the portion of the site beyond 1km of the railway station is at a density of c. 32.7 dph. This brings the overall density of Ballymastone Phase 3 to 35.3 dph. The majority of the area of the site will consist of 2 storey development with 3-storey duplex units, and with denser areas located appropriately along the DDR and in closer proximity to the railway station. This density is in alignment with the permitted Ballymastone Phases 1 and 2, the Development Plan, the LAP and the *Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities*.

5.4.2.8 Phasing and Implementation

[illegible]

Figure 5-5: Phasing of Development (Donabate LAP 2016-2022 as extended)

Ballymastone Phase 1, permitted under FCC Ref. LRD0008/S3 & ABP Ref. 315288 (see **Section 3.1.2**), is delivered on lands to the south, spanning Phases 2 and 3 of the LAP approach (Spires East and Ballymastone) and as part of the application various infrastructure was delivered to provide for future phases of development. Phase 2 of the development of the Ballymastone lands has also been permitted (FCC. Reg. Ref. LRD0039/S3 and ABP Reg. Ref. 320885, see **Section 3.1.1**), which also spans Phases 2 and 3 of the LAP approach. On this basis that the phasing infrastructure has been delivered (the DDR/ Permitted Ballymastone Educational Hub and Recreational Campus), it is considered that the proposed development may proceed in accordance with the LAP.

5.4.2.9 Ballymastone Framework Plan

Following the preparation of the Donabate LAP, the *Ballymastone Framework Plan* (the Framework) was completed by FCC in February 2018. The *Ballymastone Framework Plan* (the Framework Plan) sets out the strategy for the sustainable development of the lands within the Donabate LAP 2016, ensuring proper sustainable development of the area in tandem with the continued development of Donabate as a growing town centre in North County Dublin. An extract from the vision of the Framework is as follows:

“The Ballymastone lands will also contribute to the creation of a more socially inclusive, equal and culturally diverse society by providing for appropriate community infrastructure, quality public realm and improving access throughout Donabate. In particular, the eastern portion of the lands are identified as an appropriate location for an ‘Education and Recreation Hub’, which will include the consolidation of the established sporting amenities and will be co-located with proposed new school facilities. Two primary schools and one post-primary school will be provided on the Ballymastone lands.” (page 8)

The Framework Plan provides the broad design principles and outlines guidelines for development of the lands. The Framework sets out the first step in the design process in line with the objectives of the LAP.

In line with the LAP, this Framework Plan identified the inclusion of 1 no. post-primary school and 2 no. primary schools to be consolidated as part of the Education and Recreational Hub. As part of the approval of the Part 8 process for the Recreational Hub, a masterplan for the wider educational lands was included. The proposed development responds to the intent of the LAP and the Ballymastone Framework Plan accordingly.



6 PROPOSED DEVELOPMENT

6.1 Design Rationale

This LRD planning application forms the third and final phase of the Ballymastone lands as part of the three-phase masterplan, and provides a direct continuation to Ballymastone Phases 1 and 2 lands (FCC Reg. Ref. LRD0008/S3 & ABP Reg. Ref. 315288, and LRD0039/S3 & ABP Reg. Ref. 320885 respectively) which has permission for 432 no. dwellings and 1 no. crèche, and 364 no. dwellings respectively, for a total of 796 no. dwellings permitted to date on the Ballymastone lands.

The proposed development will provide for 398 no. high-quality residential units in a mix of 1-, 2-, 3- and 4-bed units, across a mix of apartments (124 no. units across 3 no. blocks), duplexes (47 no. units across 5 no. blocks) and houses (227 no. units). The design has been focused on promoting active uses including own-door units and inviting open spaces, which have been integrated into the design approach, connecting back into the permitted Phases 1 and 2, and complementing the permitted development in its character and open space strategy.

The vision for the proposed development at the Ballymastone lands, is to create a high-quality new residential environment in close proximity to the centre of Donabate, while being well-connected to local amenities and facilities, through a series of pedestrian and cycle routes, and gives effect to the objectives of the Donabate Local Area Plan and the Ballymastone Framework Plan.

The proposed development provides vehicular access from Portrane Road (L2170) via The Links road, with additional vehicular access points from the Donabate Distributor Road (DDR) (R126) from the east, New Road via permitted Phases 1 and 2 (FCC. Reg. Ref. LRD0008/S3 and FCC Reg. Ref. LRD0039/S3 respectively) from the south, as well as pedestrian and cycle links to all surrounding access points and connecting to the permitted Ballymastone Phases 1 and 2 development to the south.

The overall layout and landscaping design will provide a high level of amenity for the future residents, helping to create an individual sense of character within the development, and having regard to the architectural sensitivities of the St. Ita's Hospital Complex ACA. The proposed open spaces including communal open spaces, parks and pocket parks are extensively landscaped in order to ensure a high level of amenity for future residents.

For a complete design rationale please refer to the *Architectural Design Statement* prepared by MDO Architects.

6.2 Residential Mix

The proposed development comprises a total of 398 no. dwellings, consisting of 227 no. houses, 47 no. duplexes (across 5 no. blocks), and 124 no. apartments (across 3 no. blocks). **Table 6-1** details the provided mix in terms of bedrooms per dwelling.

Table 6-1: Unit Type Breakdown

Unit Type	Quantity Proposed	% of Overall Proposed Development
4-Bed	12	3.0%
3-Bed	164	41.2%
2-Bed	173	43.5%
1-Bed	49	12.3%
Total:	398	100%

All the houses, duplexes and apartment units have been designed to ensure a high standard of residential amenity, including minimising overlooking, ensuring good separation distances, variation in house types to ensure a varied streetscape, etc. This is comprehensively set out in the *Architectural Design Statement* prepared by MDO.

The proposed unit mix contributes positively to the overall housing mix on the Ballymastone masterplan lands. Please refer to the *Housing Quality Assessment* prepared by MDO for further details of the overall housing mix.

6.3 Height

The proposed development consists of a mix of building types, at various heights, with a predominance of 2-storey houses, with 3-storey duplex units. Please refer to page no. 8 of the *Architectural Design Statement* prepared by MDO.

The proposed apartment blocks range from 4 to 6-storeys, using gradual stepped design to provide visual interest, creating a diverse and attractive façade and massing. This design and approach is in accordance with the permitted height strategy under Ballymastone Phases 1 and 2 (FCC. Reg. Ref. LRD0008/S3 and FCC Reg. Ref. LRD0039/S3 respectively). These apartment blocks are primarily located alongside the DDR (to the east of the site), defining the edge, and continuing the height strategy as per Phases 1 and 2. In addition, apartment block BA09 which includes the crèche and community space on the ground floor, is located on the north-western entrance to the site, defining the vehicular gateway along the existing Links Road. This design approach is in accordance with the Donabate LAP and the Ballymastone Framework Plan height strategy, in addition to the Urban Development & Building Height Guidelines. Please see **Section 5.4** for additional information regarding compliance with local planning policy.

6.4 Open Space and Play Provision

The proposed development seeks to create 3 no. small parks and 4 no. pocket parks which total c. 17,288 sq.m, equipped with play equipment, fitness equipment and other amenity opportunities for residents. **Figure 6-1** shows the locations of the proposed public open spaces. The proposed layout creates a network of open space, and links together with open space provided under Ballymastone Phases 1 and 2 to the south. The detailed design of the proposed public open space is provided in the *Landscape Strategy Submission* prepared by CSR and the accompanying landscape drawings.

A key characteristic of the proposed development is the retention of the existing mature hedgerows and woodland insofar as possible, which will provide a sense of maturity and place to the landscape, whilst also providing natural divisions and protecting biodiversity integrity. As such, the proposed open spaces have been designed to retain as much of the existing hedgerows and trees as possible.

Approximately 15.3% (c.1.73ha) of the net site area is provided as public open space, which is in excess of the 15% stipulated by FCC in the Development Plan.

The proposed open space is also delivered in accordance with Objective CIO38 of the Fingal Development Plan which states:

“Require a minimum public open space provision of 2.5 hectares per 1000 population. For the purposes of this calculation, public open space requirements are to be based on residential units with an agreed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.”

The proposed development includes 222 no. units with two or fewer bedrooms, and 176 no. units with three or more bedrooms. As such, using the quantities noted in the objective, the expected population for the



purposes of open space requirements is c.949 no. people. This would require c. 2.37ha of Class 1 (75% - 1.77ha) and Class 2 (25% - 0.6ha) public open space. It is proposed to provide c. 1.73ha of Class 2 public open space on the site. Class 1 Open Space will be supplemented by the permitted Ballymastone Recreational and Educational Hub which provides extensive and accessible facilities.

Please refer to *the Landscape Strategy Submission* and accompanying landscape drawings prepared by CSR.

In addition to the public open space provided, it is proposed to provide 4 no. communal amenity spaces (shown in orange), which are shown alongside the public open space (shown in green and blue) provision in **Figure 6-1**. In total, c. 1,159 sq.m of communal amenity space is required for the proposed apartment/duplex blocks, and it is proposed to provide c. 2,893.5 sq.m of communal amenity space.

A breakdown of the open space area proposed is included in **Table 6-2**.

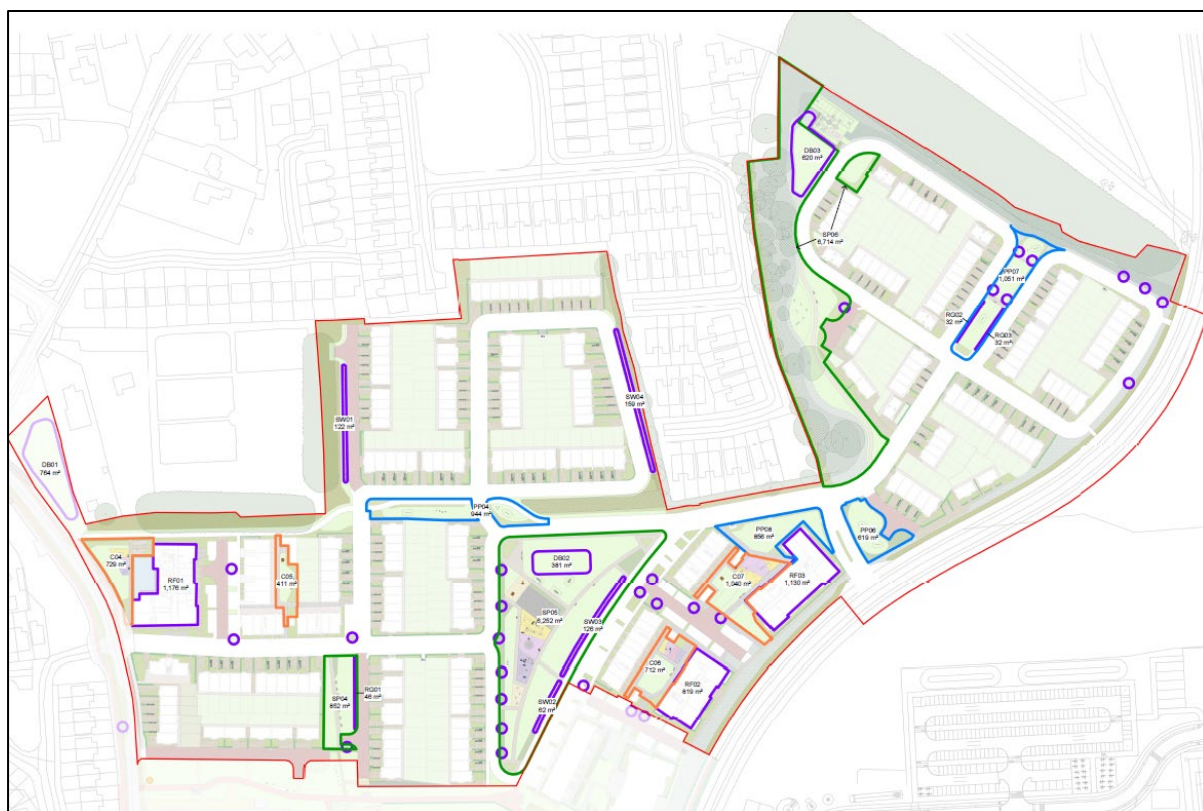


Figure 6-1: Extract from drawing no. 19164-2-3121 (Public Open Space, Communal Open Space & SUDS) prepared by CSR

Table 6-2: Area of Open Space Proposed

Public Open Space	Area	Communal Amenity Space	Area
SP04	c. 851.8 sq.m	C05	c. 411.5 sq.m
SP05	c. 6252.1 sq.m	C06	c. 712.4 sq.m
SP06	c. 6714 sq.m	C07	c. 1040.3 sq.m
PP04	c. 943.9 sq.m	C04	c. 729.4 sq.m
PP06	c. 619.3 sq.m		
PP07	c. 1050.9 sq.m		

Public Open Space	Area	Communal Amenity Space	Area
PP08	c. 856.3 sq.m		
Total:	c. 17,288.3 sq.m	Total:	c. 2893.5 sq.m

As part of the proposed development of open space, c. 1,095 sq.m of Local Equipped Area for Play (LEAP) will be provided (consisting of c. 425 sq.m in communal amenity spaces and c. 670 sq.m in small park areas), alongside c. 2,790 sq.m of Local Area for Play (LAP) (between pocket parks and small parks). Play areas are also provided throughout the communal gardens for apartment residents.

SP05 also contains a Multi-Use Games Area (MUGA) of c. 336.6 sq.m and a ‘teen zone’ of c. 333.5 sq.m. The wide range of types of play space and recreational areas provide recreation opportunities for all ages, from small children through to teenagers. Outdoor fitness equipment is also provided as part of the proposed development, which caters for a wide range of residents and other users. The play strategy aims to provide a diverse range of play opportunities throughout the development’s open spaces, this includes dedicated play spaces for different ages and abilities. This is in accordance with the *Planning Design Standards for Apartments: Guidelines for Planning Authorities, 2025*, which recommend small play spaces (85-100 sq.m) for the specific needs of toddlers and children up to the age of six, and recommend play areas (200-400 sq.m) for older children and young teenagers.

In accordance with the Development Plan requirements, 4 sq.m of play area per residential unit (398 no. units) is required, resulting in a total of c.1,592 sq.m of play area. This means that the proposed development exceeds the requirements set out in the Development Plan, providing a total of c. 3,885sq.m of play area (LEAP and LAP) (an excess of c. 2,293 sq.m).

For further details on the proposed open space strategy please refer to the *Landscape Strategy Submission* and landscape drawings prepared by CSR.

6.4.1 Trees and Arboriculture

Trees provide both valuable amenity and wildlife habitat. They provide visual interest and amenity to an area, softening the visual impact of development on the landscape, while also fulfilling an important role in the improvement of air quality in urban areas, providing wildlife habitats, and screening noise. *The Forest of Fingal – A Tree Strategy for Fingal* sets out the Council’s policy for street tree planting, management and maintenance, which has been considered during the preparation of this application.

Surveying by a qualified arborist has taken place, and a detailed pack of arboricultural inputs, which have been prepared by John Morris Arboricultural Consultancy. The proposed development seeks to protect, preserve and incorporate existing trees, hedgerows and vegetation into the proposed scheme, whilst providing additional mixed tree planting and maintaining existing hedgerows where possible. Figure 6-2 shows an extract from drawing no. 19164-2-3120 (Vegetation Retention and Removal) prepared by CSR, which illustrates the existing trees and vegetation that is intended to be retained and removed. The trees and hedgerows retained are proposed to be incorporated into the proposed landscape scheme as outlined in CSR landscape drawings and the *Landscape Strategy Submission* also prepared by CSR.



Figure 6-2: Extract from drawing no. 19164-2-3120 (Vegetation Retention and Removal) prepared by CSR

6.5 Access, Car Parking and Bicycle Parking

The proposed development is located in close proximity to the centre of Donabate (west of the subject site), and as such takes advantage of access opportunities to town facilities and transport options. The proposed development includes several walking/cycling connections to neighbouring existing developments, as well as permitted development, including to The Links (existing) to the west of the site, and Phases 1 and 2 of Ballymastone (permitted) to the south, and eastwards to the permitted Ballymastone Recreational Hub, to be delivered by Fingal County Council.

Vehicular access to the proposed development is proposed at 2 no. locations: The Links road to the west of the site and the R126 (DDR) to the east.

Between the access provided by the dedicated pedestrian and cycle connections, and general vehicular access, the proposed development is highly permeable, and facilitates easy active travel between the site, Donabate town centre, and onward to the railway station.

Donabate railway station is a c. 15-minute walk from the western side of the development, or a c. 5-minute cycle. The railway station is currently served by northern commuter rail services and is due to benefit from increased service from 2026/2027 following the introduction of battery-electric DART trainsets, which will be introduced in advance of the electrification of the line with overhead line equipment (OHLE) as part of the DART+ Coastal North project, which has recently been granted (ABP Reg. Ref. 320164).

The site also enjoys proximity to the 33b, 33d, 33e and 33t bus services. The primary route serving the area is the 33b which runs along the Portrane Road (L2170/R126) to the north of the subject site, connecting Portrane and Swords via Donabate, running every 30 minutes generally, Monday – Friday, with marginally reduced frequency on Saturday and Sunday. Under the BusConnects Dublin plan, the L83 will supersede the 33b, and will maintain similar frequency, with some improvements, including a new terminus at Dublin Airport. The 33d currently runs from Portrane to the city centre via Donabate and the Port Tunnel, once per day in each direction.

Please see the *Traffic and Transportation Assessment* prepared by DBFL for more detailed information about the current public transport arrangements and future plans and projects.

6.5.1 Car Parking

The proposed development provides sufficient car parking spaces, in accordance with the Development Plan (see **Section 5.4.1**) and the 2024 *Sustainable Residential Development and Compact Settlement Guidelines* (SPPR3).

Figure 6-3 shows an extract from the *Traffic and Transport Assessment* prepared by DBFL, detailing the proposed car parking quantities, along with the ratio used to calculate these quantities. A detailed breakdown of requirements, considering all relevant guidelines regarding car parking can be found in the *Traffic and Transportation Assessment* prepared by DBFL. It is noted that **Figure 6-3** does not include public EV charging provision. In total, including public EV charging provision, it is proposed to provide 316 no. parking spaces, the quantity of which is broken down in **Figure 6-4**.

Land Use		No. Units	Proposed Car Parking Ratios	Proposed Car Parking Provision	
				Long Stay	Drop Off
Houses	2 Beds	81	1 space / unit	81	-
	3 Beds	134	1 space / unit	134	-
	4 Beds	12	1 space / unit	12	-
Apartments	1 Bed	47	0 space / unit	0	-
	2 Beds	68	0.3 space / unit	19	-
	3 Beds	9	1.0 space / unit	9	-
Duplexes	1 Bed	2	0 space / unit	0	-
	2 Beds	24	0.5 space / unit	12	-
	3 Beds	21	1 space / unit	21	-
Creche	Classroom	4	1 / classroom	5 (Staff)	5 (Drop-off)
Community Hall	sqm	100.4	1 / 100m ²		
Total				293	5

Figure 6-3: Extract from *Traffic and Transportation Assessment* (Table 4-3) regarding parking requirements

Details of the proposed EV charging strategy is included in Section 4.4 of the *Traffic and Transportation Assessment* prepared by DBFL. In summary, the Development Plan requirements for EV charging have been rationalised considering the charging capabilities of different types and charging capacities of chargers (7.4kW chargers versus 22kW chargers), and as such, it is proposed to provide 6 no. 22kW fast charging spaces, which exceeds the charging capacity of 15 no. spaces equipped with standard EV charging equipment, which would be required under the Development Plan provisions without rationalisation. Additionally, 12 no. further parking spaces will be ducted for future expansion of similar EV charging provisions (i.e 22kW chargers), as noted in **Figure 6-4**.

3 no. spaces (5%) of the off-curtilage parking quantity (60 no. spaces for apartments and duplexes) are accessible spaces, in accordance with best practice, noting the Development Plan has no specification for mobility accessible spaces for residential development. As noted in **Figure 6-4**, 1 no. of the accessible spaces will be provided with EV charging equipment, with the remaining 2 no. spaces being ducted for future provision of charging equipment.

Car Park Type	Provision
Houses	227
Apartments	28
Duplexes	33
Residential Sub-Total	288
Creche / Community Hall	10
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	28
Total	316

Figure 6-4: Extract from Traffic and Transportation Assessment (Table 4-4) regarding proposed parking quantities

6.5.2 Bicycle Parking

The proposed development seeks to provide a total of 1,619 no. bicycle parking spaces, of which 1,513 no. are long-term residents bicycle parking spaces and 106 no. are short-term visitor bicycle parking spaces. The breakdown of the bicycle parking spaces proposed are shown in **Figure 6-5**, which also includes the requirements for bicycle parking per the Development Plan and the Compact Settlement Guidelines for context.

Bicycle parking for residents of the apartment/duplex units will be provided by a mix of internal and external storage areas throughout the development, providing safe, secure and weather protected environments for bicycle storage, using tiered racks, in addition to accessible/cargo bicycle parking at ground level (provided at a rate of 5%). Bicycle stores will also contain lockers to store residents bicycle equipment.

Mid-terrace houses are proposed to include a combined bin/bicycle storage structure incorporated into the front curtilage of the unit, to avoid the need for residents to move bicycles through the house to access the rear garden. The remaining houses will have direct access to a rear garden, providing safe and secure bicycle parking.

Cycle parking provision and storage meets the requirements of the 2024 *Sustainable Residential Development and Compact Settlement Guidelines*.

More details about bicycle parking provision can be found in the *Traffic and Transportation Assessment* and the *Mobility Management Plan* prepared by DBFL, and in the *Architectural Design Statement* prepared by MDO, alongside relevant architectural drawings.

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	86	430		258		430	
	4 Beds	12	72		48		72	
Houses (mid terrace)	2 Beds	81	243	-	162		243	-
	3 Beds	48	240		144		240	
	4 Beds	-	-		-		0	
Apartments	1 Bed	47	94	24	47		94	24
	2 Beds	68	204	34	136		204	34
	3 Beds	9	45	5	27		45	5
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	20
Community Hall (Sqm)		100.4	0	2	-	-		
Sub Total			1,513	108	935	-	1,513	106
Total			1,621		935 + visitors		1,619	

Figure 6-5: Extract from *Traffic and Transportation Assessment* (Table 4-2) regarding bicycle parking requirements and proposed provision

6.5.3 Motorcycle Parking

In accordance with the Development Plan, 6 no. motorcycle spaces are proposed, which is 10% of the non-residential car parking spaces, in addition to the parking associated with the apartment/duplex dwellings (60 no. spaces total, per the *Traffic and Transport Assessment* prepared by DBFL).

6.5.4 Mobility Points

Permitted as part of Phase 2 of the wider Ballymastone development (FCC Reg. Ref. LRD0039/S3 & ABP Reg. Ref. 320885) are 3 no. mobility points, which are immediately to the south of the proposed development. Future residents of the proposed Phase 3 development can easily access these points. The mobility points will facilitate bicycle parking (including cargo bicycles), car club parking spaces, public EV chargers, and e-bicycle parking. More details about the mobility points permitted can be found in the *Traffic and Transportation Assessment* and the *Mobility Management Plan* prepared by DBFL.

6.6 Residential Development Standards

The proposed development is fully in accordance with the Development Plan standards, as set out in Chapter 14 of the Development Plan (please refer to **Section 5.4.1.11**), and with the *Planning Design Standards for Apartments: Guidelines for Planning Authorities, 2025* (please refer to **Section 5.2.2**) as applicable.

6.6.1 Houses

Details of the design of the proposed houses can be found in the *Architectural Design Statement* and the *Housing Quality Assessment*, both prepared by MDO, alongside the relevant architectural drawings also prepared by MDO.

The houses proposed have been designed to comply with relevant standards relating to accessibility, particularly in terms of access and entrances, and can facilitate future adaptations by the occupier.

The proposed houses are orientated to take advantage of sunlight, with rear gardens capable of accommodating ground floor extensions (allowing the possibility of not requiring planning permission under current planning exemption regulations), should future residents require additional living space. The houses have been designed to accommodate future adaptations, including provision of a lift to the upper floor, and inclusion of a ground floor bedroom. Please see Section 5.1 of the *Architectural Design Statement* prepared by MDO included in the documentation enclosed for further information.

All houses have private well-sunlit rear gardens providing at minimum 60sq.m, exceeding private open space standards required by the 2024 *Sustainable Residential Development and Compact Settlement Guidelines* (SPPR 2).

A minimum of 22m separation from opposing first floor windows is maintained to ensure privacy and avoid overlooking, and where this distance becomes reduced, restricted aspect design is utilised to minimise impact. Please refer to Section 4.9 of the *Architectural Design Statement* prepared by MDO for further information.

Bin storage will be provided within the front curtilage where no direct access is available from the street to the rear garden (i.e mid-terrace houses). Where direct access is provided, bins can be accommodated in the rear garden.

Please refer to the *Housing Quality Audit* prepared by MDO for a detailed demonstration of the compliance of the proposed units with the relevant guidelines, design standards and SPPRs as appropriate.

6.6.2 Apartments / Duplex Units

Details of the design of the apartments/duplex units proposed can be found in the *Architectural Design Statement* and the *Housing Quality Assessment*, both prepared by MDO. In summary, the apartments/duplex units have been designed to comply with all relevant standards i.e the current 2025 *Planning Design Standards for Apartments*, and with the previously published standards, *Sustainable Urban Housing: Design Standards for New Apartments* (2023 update). Additional information is contained in the *Architectural Design Statement* prepared by MDO.

The proposed apartment/duplex units meet or exceed the requirements regarding floor area. SPPR 2 of the *Planning Design Standards for Apartments: Guidelines for Planning Authorities, 2025* (the apartment guidelines) specifies the minimum permissible floor area, as shown in **Table 6-3**.

Table 6-3: SPPR 3 Minimum Floor Area Guidelines

Apartment Type	Minimum Floor Area
Studio apartment (1 no. person)	32 sq.m
1-bed apartment (2 no. people)	45 sq.m
2-bed apartment (3 no. people)	63 sq.m
2-bed apartment (4 no. people)	73 sq.m
3-bed apartment (4 no. people)	76 sq.m
3-bed apartment (5 no. people)	90 sq.m

Additionally, the apartment guidelines state that at least 25% of units in any proposed scheme of 10 no. or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1- (including studios), 2- or 3-bed units, by a minimum of 10%.

Please see both the *Architectural Design Statement* and the *Housing Quality Assessment*, prepared by MDO for further detail regarding the compliance with floor area requirements. It is noted that the subject proposed development was designed prior to the publication of the apartment guidelines in July 2025. As such, the proposed development was intended to be in accordance with the previous guidelines (2023), which set higher minimum standards, and as such the proposed development exceeds the minimum standards of the 2025 apartment guidelines.

The proposed development has a maximum of 10 units per core, thereby meeting the requirements of the previous maximum of 12 no. apartments per floor per core as per SPPR 6 of the 2023 apartment guidelines (now superseded by 2025 guidelines which do not set a maximum number of units per core). MDO's *Architectural Design Statement* and drawings clearly set this out.

The proposed development meets the requirements for Floor to Ceiling Height as per SPPR 4 of the 2025 apartment guidelines (and SPPR 5 of the 2023 previously published apartment guidelines as referenced above).

Sufficient private open space is also provided for each apartment/duplex unit proposed in accordance with the *Planning Design Standards for Apartments: Guidelines for Planning Authorities, 2025*. The guidelines state the following with regard to private open space:

■ Studio	4 sq.m
■ 1-bed	5 sq.m
■ 2-bed (3 no. people)	6 sq.m
■ 2-bed (4 no. people)	7 sq.m
■ 3-bed (4 no. people)	7 sq.m
■ 3-bed (5 no. people)	9 sq.m

The guidelines require the following minimum communal amenity space areas:

■ Studio	4 sq.m
■ 1-bed	5 sq.m
■ 2-bed (3 no. people)	6 sq.m
■ 2-bed (4 no. people)	7 sq.m
■ 3-bed (4 no. people)	7 sq.m
■ 3-bed (5 no. people)	9 sq.m

The guidelines also require that communal amenity space must be provided within a scheme which can be in the form of courtyards, roof gardens etc.

The proposed apartments are provided across 3 no. blocks whilst the duplex units are dispersed throughout 5 no. blocks. Where duplex and apartments are paired together in an urban block, both have shared Communal Amenity Space. Where duplexes are standalone there are rear gardens as they mix with houses.

All communal amenity space areas meet or exceed the minimum requirements which is set out further in the *Architectural Design Statement* and *Housing Quality Assessment* prepared by MDO. Details of the communal amenity space design are included in the *Landscape Strategy Submission* prepared by CSR, and accompanying drawings, including drawing no. 19164-2-3137 (Communal Open Space), an extract of which is shown in **Figure 6-6**.

All proposed apartment/duplex units also have sufficient storage space provided internally to meet or exceed the standards set under the apartment guidelines, which are as follows:



■ Studio	3 sq.m
■ 1-bed	3 sq.m
■ 2-bed (3 no. people)	5 sq.m
■ 2-bed (4 no. people)	6 sq.m
■ 3-bed (4 no. people)	6 sq.m
■ 3-bed (5 no. people)	9 sq.m

Please see the *Housing Quality Assessment* prepared by MDO for further detail about storage provided for the proposed units.



Figure 6-6: Extract from drawing no. 19164-2-3137 (Communal Open Space) prepared by CSR

All apartments in the proposed apartment blocks are orientated along a north-south axis, ensuring that there are no north-facing apartments, with over 50% of all apartments provided with dual aspect. This meets the standards for dual aspect as per the current 2025 apartment guidelines (SPPR3) and previous 2024 apartment guidelines. Please see the *Architectural Design Statement* and *Housing Quality Assessment* prepared by MDO for further detail. A *Daylight and Sunlight Analysis* has also been prepared by IN2.

6.7 Sunlight and Daylight

The overall configuration and design of the proposed development has been influenced by the need to achieve the best possible levels of sunlight and daylight penetration into the development. The proposed orientation of the blocks represents the best response to the site context in terms of day light and sunlight availability as a result of the density and height proposed.

A *Daylight and Sunlight Analysis* has been carried out by IN2 which informed the design of the proposed development. In summary, the report confirms that the best practice daylight and sunlight availability has been ensured, with no impact on the neighbouring environment. Please refer to the *Daylight and Sunlight Analysis* prepared by IN2 for more detailed information.

6.8 Childcare Provision

The *Guidelines for Planning Authorities on Childcare Facilities* (2001) indicate that Development Plans should facilitate the provision of childcare facilities in appropriate locations. These include larger new housing developments where planning authorities should require the provision of a minimum of 1 no. childcare facility with 20 no. places for each 75 no. dwellings.

However, the *Planning Design Standards for Apartments: Guidelines for Planning Authorities, 2025* state that:

“Notwithstanding the Planning Guidelines for Childcare Facilities (2001), which are subject to review, 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, 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 on-site childcare provision and subject to the factors above, this may also apply in part or whole, to units with two or more bedrooms”.

The proposed scheme contains 49 no. one bed-apartments, which as per the above, are discounted in the calculation of the requirement for childcare spaces. Therefore, the proposed development comprises 349 no. 2, 3 and 4 bed residential units and the demand for childcare spaces is calculated below –

349 no. units (total units less 1-bed units) / 75 dwellings = 4.7 X 20 (minimum spaces required) = c. 93 no. childcare spaces.

Applying the Childcare Guidelines 2001 to the proposed development, a total of c. 93 no. childcare spaces will be required. The proposed crèche will be c. 646.3 sq.m in area, with an external play area. Using a range of approximately 4-6sq.m per childcare place, this would provide c. 108 - 161 childcare places. As such, the proposed crèche will meet the anticipated demand for childcare facilities for this development.

Please refer to the *Schools Demand & Childcare Facilities Assessment* prepared by BSM which examines childcare provision in the area, and the proposed crèche which forms part of the proposed development.

6.9 Community Space

The provision of a community space is included as part of the proposed development within the envelope of the proposed apartment block located to the west of the subject site. The community space will be c. 100 sq.m (see **Figure 6-7**). The community space will provide a facility for community meetings and events.



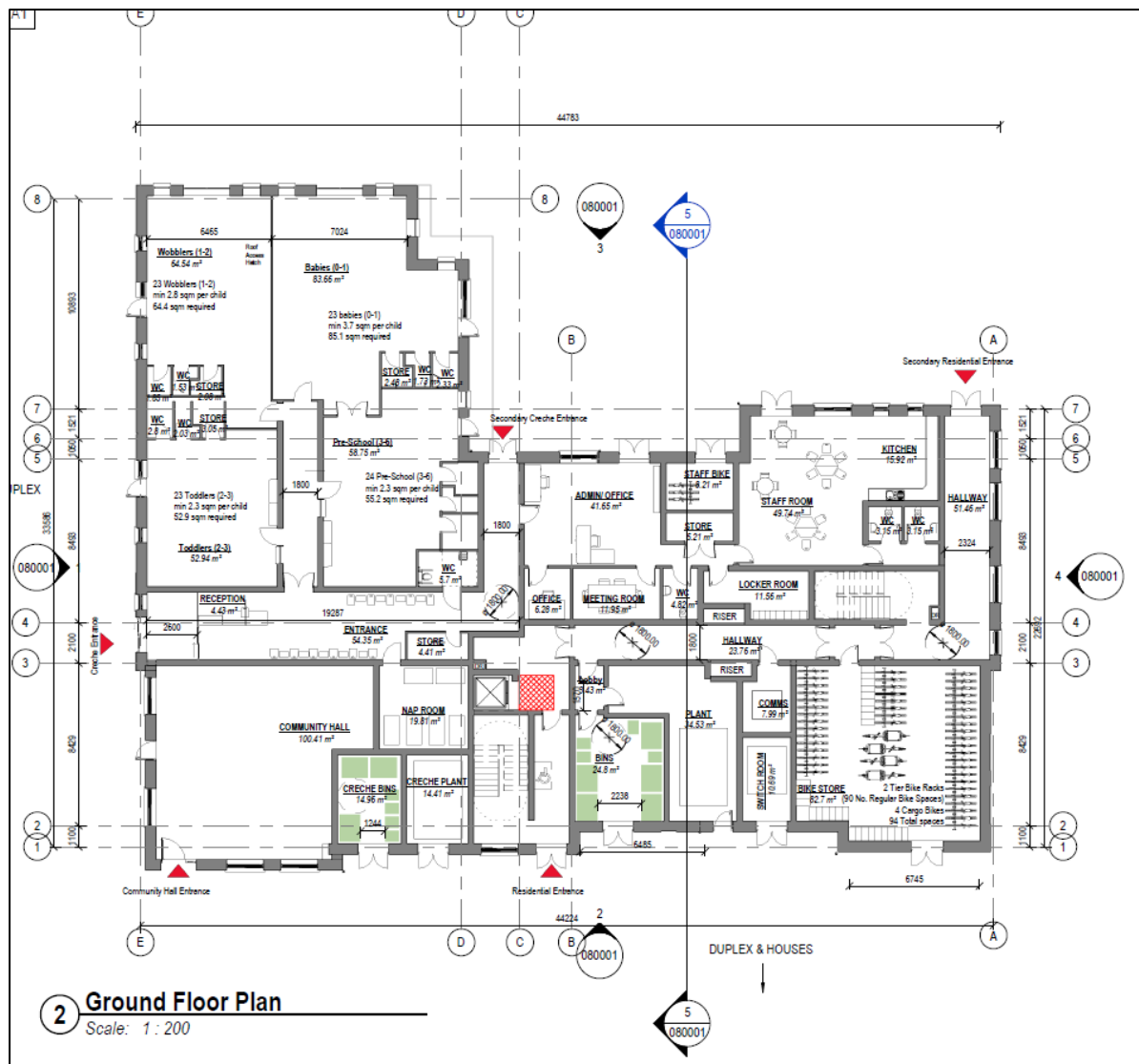


Figure 6-7: Extract from drawing no. 23010-MDO-BA09-ZZ-DR-A01-070001 (APARTMENT BLOCK BA09 PLANS) prepared by MDO

6.10 Drainage and Flooding

A Surface Water Management Plan is included in the *Infrastructure Design Report* prepared by DBFL for the proposed development, which is in accordance with the overall drainage strategy for the wider Ballymastone lands. It is proposed to incorporate SuDS measures throughout the site, to minimise the impact of any run-off that is altered by the proposed development. Please see Section 3 of the *Infrastructure Design Report* prepared by DBFL for further information relating to surface water drainage.

A *Site-Specific Flood Risk Assessment* has been prepared by DBFL and has been enclosed with the application documentation. In summary, it is determined that the subject site is within Flood Zone C, and therefore residential development is appropriate for the site, and a “good level of flood protection” has been afforded in the event of a 100-year return event.

7 PART V REQUIREMENTS

Consultation has taken place with FCC Housing Department with regard to Part V housing requirements. Following this consultation, FCC have issued a Part V validation letter which has been included as part of the subject LRD planning application, which confirms a satisfactory proposal has been provided to the Housing Department in FCC. This letter notes that costs will be agreed subject to a grant of planning permission.

It is agreed that 20% of the dwellings proposed for delivery will be provided as social housing, with a formal proposal to be submitted to FCC post-planning consent, satisfying Part V requirements.

Please also refer to the Part V drawing pack prepared by MDO. **Figure 7-1** shows the locations of the proposed Part V units in blue.



Figure 7-1: Extract from drawing no. 23010-MDO-ZZZZ-XX-DR-A01-100000 (Part V - Site Layout Plan - Overall) prepared by MDO

8 ENVIRONMENTAL CONSIDERATIONS

8.1 Appropriate Assessment (AA)

European sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)) make up a network of sites designated for nature conservation under Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora (the “Habitats Directive”) and Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (the “Birds Directive”). The requirements for Appropriate Assessment are set out under Article 6 of the Habitats Directive, transposed into Irish law by the European Union (Birds and Natural Habitats) Regulations 2011-20153 (the “Birds and Natural Habitats Regulations”) and the Planning and Development Act, 2000 - 2021 (the “Planning Acts”).

The proposed development site at Ballymastone (Phase 3) is not under any designation for wildlife or nature conservation.

No rare, threatened or legally protected plant species, as listed in the *Irish Red Data Book 1 – Vascular Plants* (Curtis & McGough, 1988), the Flora Protection Order, 2022, or the EU Habitats Directive, are known to occur within the site and none have been recorded. No rare habitats or habitats of particularly high ecological value (i.e. International or National) are present at the site. The hedgerows are of Local (Higher Value) Importance for their ecological/habitat connectivity and for nesting birds as well as commuting and foraging bats.

The site is not of value for wintering birds. There has been no evidence of any habitats or species with links to European sites recorded at the site and no ‘reservoir’ type habitats (habitats which have the potential to support Qualifying Interest/Special Conservation Interest species in any European site) are present. An appraisal of the site has been undertaken to assess its suitability for use by birds that favour open farmland or rough pasture, such as lapwing and curlew (red list species) or pale-bellied Brent goose (amber list). The site is unsuited to use by migrating or wintering birds such as those listed as Special Conservation Interests in any of the SPAs within the potential Zone of Influence of the proposed development (such as light-bellied Brent geese).

The proposed development site, which comprises the final phase of three large-scale residential developments of which the first two are already permitted and under construction, is located between Rogerstown Estuary (to the north) and Malahide Estuary (to the south).

The screening for appropriate assessment confirmed that there is the potential for significant effects on Rogerstown Estuary SAC and Rogerstown Estuary SPA via surface water due to sedimentation and run-off (contaminated surface water) during construction. It also confirmed that, given the nature, location, scale and duration of the construction phase for the proposed development there will be no likely significant effects via disturbance on Rogerstown Estuary SPA and SAC (or indeed on Malahide Estuary SPA and SAC or any other European site). There is no possibility of any other potential direct, indirect or secondary impacts on any European site during the construction phase. For example, there will be no land-take from any European site and there will be no resource requirements such as water abstraction. Similarly, there will be no emissions to air from construction vehicles that could remotely impact any European site. Dust, noise and vibration arising during construction will similarly be entirely remote from any European site.

The screening for appropriate assessment also confirmed that there is no possibility of any other potential direct, indirect or secondary impacts on any European site once the proposed development is operational. There will be no loss, fragmentation, disruption, disturbance or other change to any

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element of any European site as a result of the operation of the proposed development, and no interference with the key relationships that define the structure or function of any European site.

Following Appropriate Assessment Screening, a *Natura Impact Statement* has been prepared to support the subject LRD planning application for Ballymastone (Phase 3). The NIS concludes that:

“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.”

Please refer to the *Natura Impact Statement* prepared by BSM for further detail and information.

8.2 Environmental Impact Assessment (EIA)

Environmental Impact Assessment (EIA) is derived from EU environmental policy and specifically from the initial EIA Directive of 1985 and its three amendments, which have been replaced and codified by *Directive 2011/92/EU* of 13th December 2011. *Directive 2011/92/EU* was amended in 2014 by *Directive 2014/52/EU*. Together these comprise the EIA Directive.

The EIA Directive is transposed into Irish legislation in the *Planning and Development Act 2000* (as amended) and the *Planning and Development Regulations 2001* (as amended) (the Regulations) (including in Schedule 5 of the Regulations) and the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018.

The EIA Directive aims to afford a high level of protection for the environment and human health. It requires that an assessment of a projects likely significant effects will have on the receiving environment, where relevant, before development consent is given.

Parts 1 and 2 of Schedule 5 of the PDR 2001 list the classes of development for which EIA is required by default. In Part 1, major project classes (including industrial, chemical, energy, waste, infrastructural and intensive agricultural projects) are identified for the purposes of mandatory EIA. In Part 2, specific thresholds are cited; EIA is a requirement for projects of a class listed here that also meet or exceed the corresponding threshold.

The proposed development is not of a class of development listed in Part 1 of Schedule 5 of the PDR 2001 and, therefore, EIA is not a statutory requirement under this provision. However, the proposed development does correspond with the classes of development listed in paragraphs 10(b)(i) and 10(b)(iv) of Part 2 of Schedule 5 of the PDR 2001.

Infrastructure projects, including urban development projects, are specifically addressed under Section 10 in Part 2 of Schedule 5. This section includes two provisions, which the stated thresholds for an EIA, are relevant to the proposed development:

“10(b) (i) Construction of more than 500 dwelling units; and



10(b) (iv) *Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere."*

The proposed development comprises 398 no. residential units on a site of 11.28 ha, on a site that can be considered as 'other parts of a built-up area'. The proposed development (Phase 3) is the third and final phase of the development planned on the wider Masterplan site (total masterplan area is c. 32Ha) under the control of the Applicant at Ballymastone. When considered together, the gross quantum of development proposed for Ballymastone Phase 1 (432 residential units permitted by An Coimisiún Pleanála (FCC Ref.: LRD0008/S3 & ABP Ref. 315288)), Ballymastone Phase 2 (364 units permitted by An Coimisiún Pleanála permitted (FCC Ref. LRD0039/S3 & ABP Ref. 320885)) and Ballymastone Phase 3 ('proposed development') exceeds the thresholds specified in relation to these classes of development.

The *Environmental Impact Assessment Report* prepared by BSM submitted with the LRD planning application has been prepared in accordance with Section 172 of the *Planning and Development Act 2000* (as amended) and Part 10 and Schedule 6 of the *Planning and Development Regulations 2001* (as amended).



9 CONCLUSION

It is respectfully submitted that the proposed development will provide an appropriate form of high-quality residential development for this zoned strategic greenfield site, in close proximity to the centre of Donabate, and within the wider urban envelope.

The proposed development will see the delivery of 398 no. high-quality residential units, across a mix of houses, apartments and duplex units, which themselves consist of a suitable mix of sizes, ranging from 1-bed to 4-bed dwellings.

This Planning Report and Statement of Consistency demonstrates that the proposed development is in accordance with the *Fingal Development Plan 2023-2029*, *Donabate Local Area Plan 2016* (as extended), the *Planning Design Standards for Apartments: Guidelines for Planning Authorities, 2025*, and with all other relevant national, regional and local planning policies and guidelines, thus constituting proper planning and sustainable development of the area.

It is therefore considered that planning permission should be granted in the interests of the sustainable development of the area.



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