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25th August 2025

Planning Department
Fingal County Council
Swords
Co. Dublin
(submitted online)

Re: application LRD0058/S3E, Portmarnock

A chairde,

I refer to the above application, and wish to make the following observations:

General principle of development

I support the development of housing on this site in line with the zoning in the County Development Plan and subject to the limitations resulting from its location in the Airport Outer Safety Zone and to compliance with the Water Framework Directive obligations to bring water bodies to good status.

However, the development needs to be accompanied by improvements to conditions for walking and cycling, and by improvements to the availability of childcare for existing and new residents.

Urgent need for improvement to walking and cycling facilities in the area

There is a grave need to improve conditions for people walking and cycling in the Portmarnock Area. This is especially important for travel to schools, given that the Station Road area of Portmarnock, including this proposed development, constitutes an exceptional residential area wherein schools cannot be provided for aviation safety reasons.

The availability of the Baldoyle to Portmarnock Greenway is very welcome for trips south of the area, but further work remains to link that effectively to Baldoyle, to Sutton Cross, to Howth and to the Sutton to Clontarf coastal greenway.

The link into Portmarnock village proper, including to some of the local schools, badly needs improvement to a proper safe segregated standard.

The above connections will hopefully be made as part of the Sutton to Malahide Greenway project. I continue to urge the Council Executive to come back with the design of this scheme which is now long overdue.

The link from Station Road to Kinsealy, also an important link to two primary schools, identified as vital in the 2019 Local Area Plan for Kinsealy, was to have gone to planning in 2021 but a design is still awaited.

Condition 2 of planning permission SHD/012/19 required the redesign of the junctions at either end of Station Road before development started on Portmarnock South Phase 1C of St.Marnock's. This didn't happen before development started. The Strand Road junction has since been redesigned. The Drumnigh Road junction still hasn't. For background please see <https://davidhealy.com/?p=1389>.

It appears that the Kinsealy to Portmarnock greenway link design may now cover the redesign of this junction.

As it stands, the planning system has to date failed to ensure the provision of safe infrastructure for people walking and cycling, despite a very clear mandate in both national policy and the County Development Plan, and despite appropriate conditions being imposed in a planning decision by An Bord Pleanála.

The link over the existing railway overbridge to Drumnigh is vital for local connectivity and travel to Belmayne. It should be open by now. I understand that this is a simple resurfacing job; it should be prioritised.

Permission for this next phase of development should include conditions requiring the provision of all the above infrastructure in time for the occupation of the proposed houses.

Walking- and cycling-oriented design

This development should be designed with a view to supporting a high level of active travel. Unfortunately, that is not yet the case.

Proposed provision of car parking in excess of Development Plan maximum permissible

The application proposes 289 car parking spaces and claims this in compliance with the County Development Plan.

The relevant maximum car parking ratios in the County Development Plan for this area, set out in Table 14.19 are 1 space per unit of 3 or more bedrooms and 0.5 spaces per unit of 1 or 2 bedrooms. This gives a maximum of 266.5 spaces. The proposed level of provision materially contravenes this requirement.

(The application is correct in stating that SPPR 3 of the Compact Settlement Guidelines “takes precedence” over the Development Plan, but its apparent understanding of what that means is in error. SPPR 3 constrains the County Development Plan, it does not replace it.)

Clustering of parking spaces

The County Development Plan is strongly supportive of the development of car free neighbourhoods and streets, where appropriate (Objective SPQHO2), and goes into detail as follows (p.601):

The provision of car free neighbourhoods and streets in accordance with Objective SPQHO2 can bring multiple benefits. Typically such neighbourhoods and streets would allow motor vehicle access for deliveries only, confining parking to a dedicated parking area at the periphery. Car free neighbourhoods are typically best suited to higher density neighbourhoods, creating a much better quality public realm with safety, public health, and green infrastructure benefits for the community, and economic benefits for householders.

The manner in which the streetscape of the existing phases of the St. Marnock’s development is visually dominated by car parking demonstrates the potential for a much more pleasant, and much safer layout in this phase.

By clustering the parking at one location in the development, safety would improve, especially for children due to better sight lines at street level, and scope would be created for street trees and other planting.

Street and road layout

Complementary to the improvements which would be facilitated by clustering the car parking would be changes to the road layout. The layout should be fully permeable for walking and cycling. However, the layout for motor vehicles should not. The loops

proposed for the current motor vehicle access, with a through road along the length of the open space, will facilitate greater speeds on the streets, putting people walking and cycling, especially children, at greater risk.

The cycle route proposed along Road 5 may be a response to this risk. It should not be seen as necessary to try to segregate cycling on a suburban street; redesigning this street as a cul de sac for motor vehicles, shared with cyclists, would create a safer environment. The proposed design, where the cycle route is between off-street car parking spaces and the carriageway, could put cyclists at greater risk.

The pedestrian link from Road 9 to Road 1 is overly narrow and not overlooked.

The above points about street/road layout are additional to and complementary to the recommendation that parking be focussed in one area rather than spread throughout the development.

Public Open Space

A redesign to provide for the reduced and clustered car parking would enable meeting the required open space ratio which the application acknowledges is not met by this layout. It would also facilitate an appropriate level of street trees and planting.

The other recent developments in Portmarnock/Drumnigh are very disappointing in the way that the allocation of space to car parking has occupied so much of the space between the fronts of the houses that there is very little planting, and there are almost no street trees.

Provision of childcare

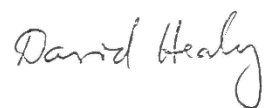
The application is correct in noting that the aviation safety rules preclude the provision of creches in this direct area. However, the suggestion in the application that a remarkably low demand for childcare should be anticipated seems to be based on making an unfounded assumption that the official guidelines assume all children avail of childcare, and then proving that assumption wrong.

The Social Infrastructure Assessment goes on to establish that there are no empty childcare spaces locally, before suggesting that no further provision is needed because there are permitted but unbuilt childcare facilities, 90% of which would be over 1.5km away if provided.

The planning obligation to provide for childcare doesn't disappear simply because the childcare can't be provided on the site itself.

Thank you for considering my observations.

Best regards,

A handwritten signature in cursive script that reads "David Healy". The signature is written in a dark ink and is positioned above the printed name.

Cllr. David Healy