

Fingal County Council,
Planning Department,
County Hall, Main Street,
Swords,
Co. Dublin.

3rd October 2025

RE: Additional Information Response – Planning Application Reg. Ref. LRD0057/S3E

Dear Sir/Madam,

DOWNEY, Chartered Town Planners, 29 Merrion Square, Dublin 2, D02 RW64, on behalf of the applicant, Golden Port Homes Limited, hereby wish to respond to Fingal County Council's request for Additional Information, dated 14th August 2025, in relation to an application lodged under Reg. Ref. LRD0057/S3E regarding the proposed development of 109 no. dwellings on lands at Forest Road, Swords, Co. Dublin. The development, as per the description contained within the statutory planning notice, provides for the following:

"The proposed development will consist of a total of 109 no. residential units (42 no. duplex units; 41 no. apartments; 26 no. houses) as follows: (i) 42 no. duplex units within 3-storey buildings comprising 21 No. 1 bed units at ground level and 21 No. 3 bed units over first and second floor levels with balconies/terraces, private and communal open space; (ii) 41 no. apartments within 2 blocks. Block A will be a 4 storey building with 14 no. apartments (5 no. 1 bed units and 9 no. 2 bed units) with balconies/terraces to the north, south and west elevations, and bin, bicycle parking and plant at ground floor level and pv panels at roof level; Block B will be a 5 storey building with 27 no. apartments (13 no. 1 bed and 14 no. 2 bed units) with balconies/terraces to the east and west elevations and bin, bicycle parking and plant at ground floor level and pv panels at roof level; (iii) 26 no. houses (comprising 5 no. 2 bed, 2 storey terrace houses; 6 no. 3 bed, 2 storey terrace houses; 4 No. 3 bed, 2 storey semi-detached houses; and 11 no. 4 bed, 3 storey houses); (iv) 96 no. Surface level car parking spaces and 4 no. surface level motorcycle parking spaces as well as bike parking stores and spaces; and bin stores; (v) 1 no. ESB substation; (vi) Landscaping, including the provision of new public open spaces with play areas and a MUGA; footpaths and cycle paths, new vehicular access/egress from Forest Road; public lighting; boundary treatment and all associated site, drainage and development works necessary to facilitate the proposed development."

Please note that this Additional Information response document should be read in conjunction with all drawings and documents submitted in response to the Additional Information request and as per the associated documentation submitted at the planning application stage. We note that as a result of the Additional Information Request, 1 no. 2-bed apartment has been omitted from the scheme and, as such the overall number of units now proposed is 108 units. The dedicated application website, www.forestroadlrd.ie has also been updated to reflect the Additional Information response.

Additional Information Request No. 1

“With reference to Transportation the following additional information is required in order to fully assess the proposed development:

- a. The applicant is requested to address the sightlines to the South of the proposed vehicular entrance. From a site visit it was observed that the sightlines to the south are obscured by the existing hedge, and could be further obscured over time due to future growth of the hedge. The applicant is requested to provide a drawing detailing all works required to the existing hedge and any proposed replanting/boundary works. The applicant should take cognisance that the posted speed limit of the road is 60km/hr.*
- b. The applicant is requested to provide the full copy of the Road Safety Audit, as only the ‘feedback form’ appears to have been included with the submission.*
- c. The applicant is requested to carry out further examination and submit the following additional details in regard to the site layout:*
 - i) the layout, dimensions and details of the ‘homezone areas’ and the associated adjacent carparking spaces, and a swept path analysis carried out for each of the spaces (with a large saloon car) to ensure adequate manoeuvrability.*
 - ii) the road surface finish/colour for the ‘raised tables’ and ‘homezones’, which should be coloured (i.e. not black) as per the guidelines of DMURS. The applicant should confirm from the manufacturer’s technical information that any proposed ‘porous asphalt’ can be coloured.*
 - iii) road signage on the Forest Road to warn of a junction ahead, as per the ‘traffic signs manual’.*
 - iv) proposals for the provision of drainage gullies in the road carriageway along the new concrete kerb on Forest Road, to prevent potential hazard on the road.*
 - v) Submit revised site layout plan showing the proposed hedging in the verge along the ‘link road’/proposed new distributor road’ set back to ensure it does not obscure sightlines at the junctions and would not encroach into the road carriageway over time.*

- d. *A revised layout plan which illustrates a 'road reservation corridor' between the end of the proposed new distributor road and the western site boundary. This area to be maintained as grass with no tree or other planting on it.*

Additional Information Response No. 1

As a response to the above, Barrett Mahony Consulting Engineers have been engaged to respond to this item, and have provided the following information:

- a) Sightline drawing, outlining sufficient sightlines for the vehicular entrance, particularly noting that Forest Road is subject to a speed limit of 60 km/h. In order to facilitate this, the existing hedge will be removed during construction to ensure that satisfactory sightlines are achieved to the south and north of the development. The removal of the hedge is indicated on all the relevant drawings and photomontages that are submitted as part of this Additional Information response.
- b) The Road Safety Audit has been provided and forms an appendix to Barret Mahony's Infrastructure Report, which is submitted under separate cover.
- c) Barrett Mahony Consulting Engineers have provided the relevant details requested, including details on the homezone areas, swept path analysis drawings confirming sufficient space for safe movement of vehicles, details on the surface finishes, road signage details, combined drainage and road drawing, sightlines within the vehicular entrance. It is important to note that this was discussed with the Roads Section of Fingal County Council prior to lodging the Additional Information Response.
- d) An updated Site Layout Plan has been prepared, which outlines the road reservation corridor, as per the Fingal County Development Plan Road Proposal located at the subject site.

Additional Information Request No. 2

"Notwithstanding the revisions proposed in terms of layout, height and design of apartment Blocks A and B adjacent to Forest Road, it appears these Blocks are now considerably closer to the road with a pinch point to the southeastern corner for Block A. The design of Block A and B should be reflective of the transitional nature of the site, between the green belt to the south and the rural nature of the area to the south and the emerging scale to the north at Ridgewood to the north, with a greater setback required from Forest Road to reduce its impact and a further reduction in height required. The applicant is requested to address the concerns of the Planning Authority in this regard and revise the development accordingly. Verified photomontages illustrating the scheme from vantage points along Forest Road should be submitted with the response. The revised layout should ensure that key frontages to the apartment blocks provide for entrances/active frontage."

Additional Information Response No. 2

Crawford Architecture have provided updated drawings of the design as part of this Further Information Response, which confirms that Block A and Block B has been set back from Forest Road to the east, Ridgewood to the north, and Greenbelt zoning land to the south. Crawford Architecture have outlined the previous building footprint in orange dashed outline to portray the differences between the previous footprint, and the footprint now proposed.

In order to facilitate this movement, Block A has been reduced by 1 no. 2-bed / 3-person unit. The entire development shall now provide for a total of 108 no. units, as per the architectural drawings submitted under separate cover of this response.

3DDB have also been engaged by the applicant to provide CGIs and Verified Views of the proposed development, with all views taken from various points along Forest Road and within Ridgewood. Fingal County Council are invited to refer to 3D Design Bureau's booklet, which is submitted under separate cover of the Additional Information Response.

Additional Information Request No. 3

"The applicant is required to submit further information to address the following:

- a) A map to clarify which units are designated as Accessible and Age Friendly, to comply with Objective SPQHO22 – Accessible Housing and Objective DMSO37 – Age-Friendly Housing of the Fingal Development Plan 2023-2029.*
- b) Please review the internal layout of the 2-bedroom apartments designated as being UD, to ensure that the doors into main bedroom and bathroom have 300mm clear to the leading edge.*
- c) Please provide floor plans of the units designated as Age Friendly demonstrating compliance with Fingal's publication "10 Ways to Create Adaptable and Age-Friendly Homes" (March 2019), and other relevant best practice guidelines."*

Additional Information Response No.3

As a response to the above, Crawford Architecture have prepared updated drawings and a stand-alone report ('RFI - Age-Friendly Accommodation') for this request, which outlines the general design principles and locations and layout for the age-friendly and UD units.

- a) An Age Friendly Accommodation Site Layout Plan which confirms a total of 11 no. units to be set out for Age Friendly accommodation within proposed Block A.

- b) An updated Universal Design Plan floor plan which confirms sufficient space for movement, and that doors have sufficient turning space.
- c) The Age Friendly Accommodation Site Layout Plan outlines the floor plans of the proposed age friendly apartment units in compliance with Fingal County Council's "10 Ways to Create Adaptable and Age-Friendly Homes."

Fingal County Council are invited to refer to the above drawings submitted under separate cover of this response.

Additional Information Request No. 4

"The applicant is requested to submit revised details to address the following issues in respect of the duplex unit types:

a) The balcony design requires review. The plans show a short stub wall and there is a soil vent pipe shown on plan but not on the elevations. It is not clear how this will comply with Part H of the Building Regulations. In addition, the ground floor terrace is accessed from the bedroom. The floor plan layout should be amended such that the terraces are accessed from living areas having regard to Section 3.8 of the 'Planning Design Standards for Apartments Guidelines for Planning Authorities' (2025).

b) End of terrace units. The elevations indicate windows to the gables, but it is not shown on plan and it is not clear if the window locations will interfere with furniture placement in the rooms. It should be noted that where duplex gables front onto public spaces, including Zones B and E, windows/entranceways should be placed on these gables in order to provide for passive surveillance/overlooking to the public realm.

c) The location of the bike store to the duplex units in Zone A should be reviewed as it blocks the view to the open space from the ground floor duplex units."

Additional Information Response No. 4

Crawford Architecture have updated the proposed duplex floor plan and elevations to include:

- a) Updated balcony design to ensure compliance with Part H of the Building Regulation for which a soil vent pipe has been shown on the floor plans and the elevation drawings provided. The ground floor layout has also been revised which now provides access to the terrace from the main living area of the unit.
- b) The end of terrace unit type 3A has outlined windows within the floor plans of the ground floor and upper floor plan.

- c) The bin and bike store in Zone A has been moved further west, to ensure it does not interrupt the view to the open space from the duplex units.

Fingal County Council are invited to refer to the above drawings submitted under separate cover of this response.

Additional Information Request No. 5

“The applicant is requested to submit revised proposals for the development layout to provide for increase passive surveillance of Open Space to the north. The dominance of rear garden boundaries along the northern edge limits passive surveillance of the open space, and stepped rear garden walls create unsupervised spaces, increasing vulnerability to anti-social behaviour, and the rear gardens themselves may also become targets due to their exposure.”

Additional Information Response No. 5

A number of changes have been made to the proposal in order to provide for increased passive surveillance of the open space to the north. In the first instance, the end of terrace houses and units now have an entrance on the side elevation in order to increase activity and passive surveillance to the open space to the north. This is indicated on the revised Site Layout Plan (extract below) as well as the relevant House Type Plans and Elevations by Crawford Architecture.



Passive surveillance has also been improved through the boundary treatment detail, whereby a low-level boundary is proposed at the side of the relevant houses before a standard height garden wall screens their private garden. The low-level boundary at the house also ensures that the open space to the north is passively surveyed and increases safety.

Additional Information Request No. 6

“The applicant is requested to review the proposed house type for unit no. 26 as the indicated house type (D) contains gable windows and this is a mid-terrace unit.”

Additional Information Response No. 6

House Type D has been updated to ensure the mid-terrace units does not have any gable windows, with the end of terrace units providing for gable windows.

Additional Information Request No. 7

“Based on the ‘Daylight and Sunlight Assessment Report’ submitted, the communal open spaces serving duplex units in zones B, C and D would not achieve compliance with BRE Guidelines in respect of sunlight. Furthermore, having regard to the layout and dimensions of these spaces and the spaces in Zone A and serving Block B, the Planning Authority is not satisfied that a satisfactory standard of residential amenity would be afforded to future residents. The applicant is requested to submit a revised layout to address this.”

Additional Information Response No. 7

In response to this, the revised Site Layout Plan by Crawford Architecture has amended the layout of the communal open spaces for zones B, C & D. In this regard, the communal bin stores are located on the eastern portion of the spaces in order to maximise the standard and usability of the communal spaces.

3D Design Bureau have carried out a Sun on Ground Assessment of the open spaces in response to Item 7 also and this is submitted under separate cover. This confirms that the revised design has significantly improved the performance of the spaces in respect of the BRE Guidance. While the performance of Zone C is slightly below the recommended level, it is more than double the performance that was originally submitted (37.17% compared to 16.76%) and will provide a good quality of usable space for residents. It is important to note that the residents of the duplex units within Zone C will benefit from larger than required units and private open space areas as well as the south facing homes.

In this regard, it is respectfully considered that the communal open spaces have been designed to a good-quality standard having regard to the BRE Guidance and will provide excellent homes for residents.

Additional Information Request No.8

“The following additional information is required in relation to archaeology in order to fully assess the proposed development on site;

a) In order to establish the presence (or absence), nature and extent of archaeological remains, and the impact of the proposed development, pre-development test-excavation by a suitably qualified archaeologist under licence to Department of Housing, Local Government and Heritage is required. Trench layout should be informed by the results of the geophysical survey and layout of the proposed development.

b) On completion of the test-excavation, the archaeologist shall submit a written report including archaeological impact statement, to the Planning Authority as part of the response to this request for additional information.”

Additional information Response No.8

As a response to this request, ACSU have been engaged to carry out an archaeological impact assessment and test excavation of the subject site. Archaeological testing was carried out under licence 25E0856, issued by the Department of Housing, Local Government and Heritage.

A total of 46 test trenches were excavated across the proposed development site with no archaeological features or deposits observed or exposed within any of the trenches, and no archaeological artefacts recovered.

Fingal County Council are invited to refer to the archaeological report submitted under separate cover.

Additional Information Request No.9

“The applicant shall submit a revised Landscape Plan which shall include the following:

a) Details of play facilities including boundary treatment, surfacing and signage.

b) The proposed Beech hedge on either side of the main entrance road is not practical for future maintenance by Fingal County Council Operations Division and should be omitted, along with the proposed bee hives at the edge of the detention basin.

c) Revised planting plan- Due to the strengthened restrictions of importing Oak trees (S.I. 30 of 2020), any proposed Quercus species with a girth size greater than 8cm shall comply with S.I. 30 of 2020 or be substituted for a suitable tree.

d) Tree planting in the south of the site shall contain smaller trees to help establishment. For example: 15% Betula pubescens, b/r, 120–150cm tall; 15% Corylus avellana, b/r, 120–150cm

tall; 10% Pinus sylvestris, r/b, 1.0m tall; 15% Salix cinerea, b/r, 120–150cm tall; 15% Crataegus monogyna, b/r, 90–120cm tall; 10% Ilex aquifolium, r/b, 1.0m tall; 20% Sorbus aucuparia, b/r, 120–150cm tall.

e) Lamp standards to be located on hard surface/footpaths and not on grassed areas.

f) Seating to be located on same material as footpaths within public open space.

g) No ESB substations, mini pillars, private bin / bicycle stores to be located on Public Open Space.”

Additional Information Response No.9

Ronan MacDiarmada and Associates Landscape Consultants have been engaged to respond to this request, and have provided the following information:

- a) Details of play facilities within the development, along with boundary treatment facilities, surfacing, and signage details.
- b) Revised tree and hedge planting proposals within the development
- c) As per the lighting layout prepared by Fallon Design, all lamps are located on hard surfaced areas and removed from tree planting
- d) It is confirmed that no ESB substations, mini pillars, or bin/bike stores are located on Public Open Space areas.

Fingal County Council are invited to refer to the relevant documentation submitted as a response to this request.

Additional Information Request No.10

“With reference to the surface water drainage, while the design appears generally acceptable, and the four pillars of surface water design (quality, quantity, biodiversity, and amenity) are adequately addressed/achieved, the following clarifications are required,

a. The applicant notes that a ground investigation has been carried out (referenced in the BMCE Civil Engineering Infrastructure Report), and the report highlights the low permeability fine-grained soils are therefore considered to be poor infiltration media on the subject site. The applicant is requested to submit this report for assessment.

b. It is noted that there are varying areas/volumes noted for the detention basin on the drawings and the Civil Engineering Infrastructure report. The applicant is requested to clarify the area/dimensions of the detention basin proposed to ensure its suitability to cater for surface water volumes for the site.

c. The report contains anomalies regarding site areas. A number of areas/site areas are noted in the Civil Engineering Infrastructure Report. The applicant is requested to clarify the site area and the calculation of the positively drained site area used as a basis of the calculations of 3.3ha, and its subsequent input into other surface water calculations.

d. Reference is made to 'both catchments' in section 3.2 of the Infrastructure Report. Clarification is sought on these catchments."

Additional Information Response No.10

As a response to the above request, Barrett Mahony Consulting Engineers has provided the following information:

- a) The Ground Investigation Report is now submitted within this response, which can be found in Appendix 7 of their Infrastructure Report.
- b) Barrett Mahony Consulting Engineers have provided clarity on the area and volumes under drainage drawing 11200 and updated Infrastructure Report, submitted under separate cover.
- c) Fingal County Council are invited to refer to the Infrastructure Report submitted under separate cover, which confirms the site area and associated calculations for drainage.
- d) It is confirmed that the site consists of one catchment area, as detailed within the Engineering Report submitted under separate cover.

Fingal County Council are invited refer to the relevant engineering documentation submitted under separate cover for further information.

Additional Information Request No.11

"With reference to the provision of a Childcare facility, the applicant concluded in the submitted Childcare Provision Assessment report that a demand of 8 additional childcare space would be generated by the proposed development and that this modest level of additional demand can be comfortably absorbed within the existing local childcare infrastructure, which comprises 16 providers offering a combined total of 489 places within a 1-2 km radius of the site. However the applicant did not provide any evidence to demonstrate that the existing providers would definitely have adequate capacity to accommodate children from the proposed development.

Objective CIO28 of Fingal Development Plan, 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.

In light of the above the applicant is therefore requested to demonstrate that adequate childcare facility services to cater for the proposed development would be available.”

Additional Information Response No.11

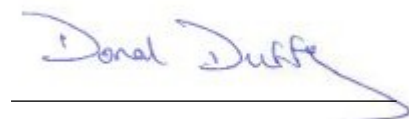
As a response to this, DOWNEY have provided an addendum to the previous Childcare Provision Assessment Report submitted. This addendum, submitted under separate cover, confirms that there is a total of 20 no. childcare facilities, within a 2km radius of the site, providing a total maximum capacity of 710 spaces. Of these childcare facilities, while some are operating at maximum capacity, DOWNEY have contacted these providers, and it is confirmed that there is a total of 45 available spaces in the nearby childcare facilities, which is far above the predicted demand generated by the proposed development. Therefore, there is no requirement to provide a new childcare facility within the proposed development. Fingal County Council are invited to refer to the addendum of the Childcare Provision Assessment Report, submitted under separate cover of the application.

Conclusion

The applicant has sought to address in full the Additional information requested by Fingal County Council and has submitted a comprehensive response to the request. A comprehensive suite of documents, reports, and drawings has been prepared by the Design Team to address each additional information request, and the Planning Authority are invited to refer to these. It is respectfully considered that the proposal will provide a high-quality residential community that will deliver not only new homes, but also a new public open space for the wider community as well as the first part of a new distributor road for Swords, which is representative of significant planning gain.

Accordingly, we respectfully request that planning permission is granted, subject to appropriate conditions, for the development at the application site.

Yours sincerely,



Donal Duffy MIPI
Director
For and on behalf of DOWNEY