

DOWNEY

29 Merrion Square, D02RW64

PLANNING STATEMENT & STATEMENT OF CONSISTENCY

Proposed Large-Scale Residential Development

**Lands at Forest Road,
Swords,
Co. Dublin**

Client: Golden Port Homes Limited

June 2025

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INTRODUCTION

DOWNEY, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this Planning Report and Statement of Consistency with Planning Policy, on behalf of our client Golden Port Homes Limited, to accompany a proposed Large-Scale Residential Development (LRD) on lands at Forest Road, Swords, Co. Dublin. The proposed development provides for the construction of 109 residential units in a mix of apartments, duplex units as well as detached and semi-detached house types; and all associated site infrastructure and engineering works necessary to facilitate the development including a temporary foul water pumping station.

The proposed development as per statutory planning notice is as follows:

“We, Golden Port Homes Limited, intend to apply for permission for a Large-scale Residential Development on lands at Forest Road, Swords, Co. Dublin. 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”.*

This development project has been shaped by insights gained from Stage 1 and Stage 2 Large Scale Residential Development (LRD) Pre-Planning meetings held under Section 247 and Section 32B of the Planning and Development Act, 2000 (as amended). A Statement of Response to Fingal County Council’s LRD Opinion Letter has been provided separately as part of the application.

This Planning Statement outlines the context of the subject site and the background and rationale of the proposed development along with a statement of compliance with all relevant national, regional, and local planning policies. This document will be separated into two different sections: Part A will include a Planning Statement for the proposed development, with Part B outlining the Statement of Consistency with Planning Policy.

It is noted this report should be read in conjunction with the accompanying detailed documentation prepared by the design, landscape, and engineering teams, along with the Statement of Response to Fingal County Council's LRD Opinion Letter, all of which are submitted under separate covers.

It is further submitted that the proposed development accords with the proper planning and sustainable development of the area, provides for a high-quality residential development and accordingly, planning permission should be granted by Fingal County Council.

PART A – PLANNING REPORT

1.0 SITE LOCATION AND DESCRIPTION

The subject site, which is the focus of this report, is a greenfield site measuring approximately 5.15 hectares. It was previously used as a golf driving range and is located at Forest Road, Swords, County Dublin, within the administrative area of Fingal County Council. The site is situated approximately 2.1 km southwest of Swords Town Centre, 1.5 km southwest of the Airside Retail Park, and 11 km north of Dublin City Centre.



Figure 1. Aerial View of the Subject Site (approximate boundaries of the site outlined in red)

The site has one existing access point located along its eastern boundary, providing direct access to Forest Road. The surrounding area is well-defined with the site bordered to the north by Ridgewood Green and primarily residential units, to the immediate east by Forest Road and Forest Little Golf Club, to the south by a detached residential dwelling along with farmland, and to the west by a greenfield site appearing in use as farmland. The site itself is characterized by a mature tree line along its northern, eastern and southern boundary with this considerably broken along its western boundary. While centrally to the subject site, as noted it is predominantly flat grassland broken up by a smattering of shrub and bush with a small, tarmacked area also located centrally within the site.

The subject site is strategically located in close proximity to key amenities, enhancing its accessibility and convenience. Notable nearby amenities include:

- Supermarket (north)- located approximately 210m in distance from the subject site, 3-minute walk, 1-minute cycle.
- Pre-school / childcare (north) - located approximately 210m in distance from the subject site, 3-minute walk, 1-minute cycle.
- Pharmacy (north) - located approximately 210m in distance from the subject site, 3-minute walk, 1-minute cycle.
- Medical Centre (north) – located approximately 200m in distance from the subject site, 3-minute walk, 1-minute cycle.
- Forest Little Golf Club – (southeast and east) – located approximately 600m in distance from the subject site, 8-minute walk and 2-minute cycle.
- Gym (northwest) – located approximately 650m in distance from the subject site, 9-minute walk and 2-minute cycle.
- Supermarket (northeast) - located approximately 800m in distance from the subject site, 10-minute walk and 2-minute cycle.
- Creche (northeast) - located approximately 800m in distance from the subject site, 10-minute walk and 2-minute cycle.
- Pharmacy(northeast) - located approximately 800m in distance from the subject site, 10-minute walk and 2-minute cycle.
- Restaurants and Cafes (northeast) within and surrounding Boroimhe Shopping Centre - located approximately 800m in distance from the subject site, 10-minute walk and 2-minute cycle
- Cedar Playground (northeast) – located approximately 1km in distance from the subject site, 13-minute walk and 3-minute cycle.
- Ridgewood Park (northeast) - located approximately 1km in distance from the subject site, 13-minute walk and 3-minute cycle.
- St Finian’s GAA Ridgewood Pitches (northwest) – located approximately 1.1km in distance from the subject site, 15-minute walk and 4-minute cycle.
- River Valley Rangers Ridgewood Pitches (northwest) – located approximately 1.1km in distance from the subject site, 15-minute walk and 4-minute cycle.
- Boroimhe Playground (northeast) – located approximately 1.1km in distance from the subject site, a 15-minute walk and a 3-minute cycle.
- Holy Family Junior School (north) - located 1.4km in distance from the subject site, 17-minute walk, 3-minutes cycle.
- Holy Family Senior School (north) - located 1.4km in distance from the subject site, 17-minute walk, 3-minutes cycle

In terms of connectivity, the site benefits from its proximity to key transport links. Specifically, the subject site is located just off Forest Road and is easily accessible via the nearby R132 regional road and the M1 motorway, which provides direct road connections to Dublin City Centre and beyond. Dublin Airport is situated just an 8-minute drive from the subject site, further enhancing its accessibility.

While in regard to public transport options to the immediate vicinity, these are robust, with several bus routes regularly serving the area. Bus routes 102, 41B, 41C, 505, 505X, 500X, 503 and 507 provide frequent services to key destinations, including Dublin City Centre (Eden Quay and Dorset Street) and Swords Main Street.

These amenities contribute to the site's appeal, offering both convenience and accessibility for future residents.

Additionally, the site is located approximately 1.5 km from the planned Fosterstown Metrolink Station, which is part of the Metrolink Scheme. This new high-capacity metro system will provide fast and efficient rail connections to Dublin City Centre in the future.

Further on public transport connects, the Dublin BusConnects initiative is to host several new bus routes proposed in close proximity to the subject site, that of the L81 Sutton-Dublin Airport Local Bus Route planned to directly serve the site as part of the Dublin BusConnects scheme together with additional city-bound service routes L82, L83 and L85 for which will help connect the area.



Figure 2. Approximate subject site (red), BusConnect routes and notable neighboring bus stops (red dotted) proposed Fosterstown Metrolink Station (black dotted)

It is thus clear, that subject site is strategically located with exceptional existing and planned public transport connections, making it an ideal location for sustainable development. The proposed upgrades to public transport services will further enhance access to key areas of Dublin, reducing car dependency for future residents and promoting the use of sustainable transport options. This

alignment with the principles of sustainable development underscores the suitability of the site for future development.

2.0 RELEVANT PLANNING HISTORY

DOWNEY has conducted a thorough review of the planning history associated with the subject site and its surrounding lands. Below is a summary of the most pertinent planning history relevant to the subject site and its broader context.

2.1 Site Specific Planning History

Excluding the pre-application considerations related to the current LRD, there is one previous planning application for the subject site, dating back to 2006. The details of this application are as follows:

Reg. Ref. F06A/0496. ABP Ref. PL06.218399 - By Order dated 8th May 2007 An Bord Pleanála refused planning permission to Gerard Gannon for the development consisting of 1. 10 no. two storey plus attic four-bedroom terraced dwellings with dormer window to the front and surface parking to the front. 2. 16 no. three storey duplex type units with first floor balconies each containing 1 one-bedroom apartment and 1 three-bedroom apartment with associated surface parking (a total of 32 dwelling units). 3. 1 no. three storey plus penthouse apartment block with balconies on all levels containing a total of 15 no. two bedroom apartments, 13 no. three bedroom apartments and 2 no. four bedroom apartments with associated surface parking (a total of 30 dwelling units). 4. 1 no. three storey plus penthouse apartment block with balconies on all levels containing a total of 14 two-bedroom apartments and 4 three-bedroom apartments with associated surface parking (a total of 18 dwelling units). 5. 1 no. six storey plus penthouse apartment block with balconies on all levels containing one 165 sq.m. crèche at ground floor level, 5 no. one bedroom apartments, 6 no. two bedroom apartments and 6 no. three bedroom apartments (a total of 17 dwelling units). 6. New vehicular access onto Forest Road. 7. New 1800mm high wall along western boundary of site. 8. New stone wall along eastern boundary of site (along Forest Road). 9. Associated site works, bin stores and bicycle storage.

Reason(s) for Refusal:

- Fingal County Council determined that the proposal materially contravened the development plan zoning objective RS1 which reads *‘To provide for new residential communities in accordance with approved Local Area Plans and subject to the provision of the necessary social and physical infrastructure’*. This is because the majority of land proposed for residential development in the application was not designated for development in the Action Area Plan for Rathingle. A grant of permission in this case was adjudged to therefore set an undesirable precedent for unplanned development, and this would be contrary to the proper planning and sustainable development of the area.

No further applications have been recorded for the site following this submission. Additionally, it is important to note that the previous reason for refusal is now considered resolved, as the requirement for a Local Area Plan (LAP) has been removed from the current Development Plan.

Significantly, several parcels of land in the surrounding area have been the focus of substantial redevelopment proposals, particularly those immediately to the north of the subject site, which are

primarily designated for residential development, with residential development in turn carried out upon them.

2.2 Planning History in the Surrounding Area

To the north of the application site:

Reg. Ref. F94A/0252. APB Ref. 06f.095628-70 - By Oder dated 17th July 1995, An Bord Pleanála refused planning permission to Sheelin Homes Ltd, for development consisting of 327 no. 2, 3 and 4 bed houses and associated site works and open spaces on site of circa 32 acres zoned for Residential Development in the 1993 Development Plan for Fingal, at Rathingle Swords, with access off Forrest Road through, Forest Great.

Reason(s) for Refusal:

- Development of the extent and kind proposed would be premature by reference to the existing deficiency in the provision of sewerage facilities (i.e. Swords Treatment Plant) and the period within which the constraints involved may reasonably be expected to cease.
- The proposed extent of development would be contrary to the proper planning and development of the area and the provision of the Development Plan by virtue of – lack of on-site provision of community facilities and unacceptable congested layout at heads of some cul-de-sacs, the lack of sufficient screening from the adjoining rural area to the west and the use of a single access to Forest Road to serve 327 houses.

Reg. Ref. F95A/0220 - By Oder dated 15th November 1995, The Fingal County Council approved planning permission to Sheelin Homes Ltd, for 86 no. 3 and 4 bed. houses and associated site works and open spaces on site of circa 13.5 acres (zoned for Residential Development in the 1993 Development Plan) at Rathingle, Swords with access off Forrest Road, through Forrest Great.

Reg. Ref. F03A/0238. ABP Ref. PL.06F.203557 - By Oder dated 7th Aug 2003 An Bord Pleanála decided and granted planning permission to MKN Properties Ltd, for a mixed use development on a site which includes a proposed Local Centre in the Rathingle Local Area Plan comprising of Block A being a 2 storey crèche (304m²), Block B containing 1 No. Medical Centre (171m²), 1 No. Retail Unit (296m²) and 7 No. 2 bed apartments in three storeys, Block C a 3 storey unit containing 18 No. 2 and 3 bed apartments, and Block D a 3 storey unit containing 15 No. 2 bed apartments on site circa 0.8 hectares, located north west of Forrest Road, east of Ridgewood Green and south west of Ridgewood Avenue with a provision for upgrading of proposed roundabout (Reg. Ref. F02A/0972) on Ridgewood Avenue, and access off same including all associated site works, open spaces, car parking, bin stores, landscaping and outfalls, at Ridgewood, Forrest Road, Swords, Co. Dublin.

To the south of the application site:

Reg. Ref. F00A/0040 - By Oder dated 22nd March 2000, The Fingal County Council refused planning permission to Gerry Sweeney for, extension to side of existing house to form office area at ground floor level and additional bedrooms at first floor level, at Forest House, Forest Road, Swords, Co. Dublin.

Reg. Ref. F03B/0349 - By Oder dated 22nd September 2003, The Fingal County Council approved planning permission to G Sweeney ESQ, for a two-storey extension to side and single storey extension to rear to form living areas, bedrooms and sunroom.

Reg. Ref. F05A/1401- By Oder dated 26th April 2006, The Fingal County Council approved planning permission to O2 Communications (Irl) Ltd. for the Development of a 24 metre support structure, carrying GSM/UMTS antennae, link dishes plus associated entrance, equipment container, access track and security fencing. The development will comprise of a 24 metre monopole structure carrying 6 No. (GSM/UMTS) antennae and 2 No. link dishes 0.6m in diameter plus 1 No. telecommunications equipment container together with associated security fencing, extension to existing access track and vehicular entrance. This development forms part of O2 Communications (Irl) Ltd GSM/UMTS network.

Reg. Ref. F16A/0571 - By Oder dated 21st March 2017, the Fingal County Council approved planning permission for retention to Three Ireland Services (Hutchinson) Ltd, for the existing 24 metre high telecommunications monopole support structure (previously granted permission under reference F11A/0275 which was a temporary permission for a period of 5 years which has expired) carrying antennae and link dishes together with associated equipment units and security fencing.

To the east of the application site:

No applicable planning permissions in that of the immediate proximity to the subject site.

To the west of the application site:

Reg. Ref. F23A/0290 - By Oder dated 19th March 2024, The Fingal Council approved planning permission to Rachel Walsh for construction of new vehicular entrance gate for the purposes of accessing an agricultural field, and associated site works at lands at Cooks Road, Swords, Co. Dublin.

3.0 Pre-Planning Consultation

Initial Section 247 Pre-Planning Meeting with Fingal County Council

The first Pre-Application Consultation with the Planning Authority required under the Section 247 of the Planning and Development Act, 2000 (as amended), took place on the 29th of February 2024 via Microsoft Teams (Ref. FPP000396).

Attendees on behalf of the Local Authority were as follows: Andrew Davidson and Camille Bleytoui.

Attendees on behalf of the Application Team were as follows: Donal Duffy (Downey Planning), John Crawford and Annabel Ryan (Crawford Architecture) and Dan Ryan (client representative).

This proposal was based on an initial sub 99-unit scheme that would have been prepared under Section 34 of the Act. This proposal only took into account the northern part of the site, which was zoned RS and did not provide for a public open space to the south. However, it was the opinion of the Planning Authority that the scheme required more density and further consideration.



- A Road proposal within development plan maps is located south of proposal and so a review of the South Fingal Transport Study, 2019 was deemed necessary.
- Need to ensure no impact on National Monument, which is located further west of the lands, would arise/Impact from road proposal was noted.
- Principle of development deemed acceptable on section of site zoned RS zoned lands.
- Density can be increased on site and inclusion of apartments would be welcomed if designed appropriately in the context of the proposal.
- No acceptable Open Space serving the subject site should be placed on the other side of the indicated distributor road.
- Proposed housing should be facing and addressing Forest Road to create a strong road frontage.
- Proposed open space should be better distributed through the site and main open space should be more central to provide ease of access to all residents.
- Connectivity with site to the north is welcomed however, open space should be designed that it is not only a walkway and that it remains useable.
- Proposed child play area to be included.
- Retaining hedgerows where possible and reinstating the equivalent or more to what might be lost.
- Tree Survey to be provided and potential bat survey.
- Ensure adequate screening, tree plantings provided.
- A Landscape Masterplan is to be provided and tree survey if necessary.
- Need to provide AA and EIA Screening Reports.

LRD Stage 1 - Second Section 247 Pre-Planning Meeting with Fingal County Council

This was the first Pre-Application Consultation with the Planning Authority required under the Section 247 of the Planning and Development Act, 2000 (as amended), took place on the 8th October 2024 via Microsoft Teams (Ref. LRD0057/S1 refers).

Attendees on behalf of the Local Authority were as follows: Jennifer Casserly, Laura Barton, Solomon Aroboto, Gemma Carr, Marta Durek, Shane Comaskey, Phillip Grobler, Hannah Millar, Finbarr Quigley, Ellen Giffney, Jessica Clarke, Shauna Hughes & Karen Leeson.

Attendees on behalf of the Application Team were as follows: Annabel Gilmartin, David Barrett, Declan Foley, Ronan Mac Diarmada, Hannah Byrne, Conor Vaughan, Donal Duffy, Hannah Byrne & Dan Ryan.



Figure 4. The draft site layout discussed in the subject LRD Stage 1 Section 247 Pre-Application Consultation Meeting with Fingal County Council

The Design Team were advised as follows:

- That proposals for apartments and increased height at road edge is concerning given the rural nature of the road and land to the south. Further consideration of the stepping of heights at this location was required.
- To provide more assessment of noise from the airport and road.
- Townland boundary to be retained and additional trees should be considered along the southern boundary, in relation to Public Lighting, no information has been provided.

- Objective DMS037 concerning an age friendly requirement on the units proposed.
- DMS0194 - Public art requirement on developments over 100 units was noted along with.

LRD Stage 2 – Section 32C Pre Application Consultation with Fingal County Council

A Section 32C Pre Application Consultation was held on 18th December 2024 with Fingal County Council. The proposal in that instance comprised the northern part of the site, which is zoned RS – Residential, and comprised a proposal for a total of 104 no. residential units as follows:

The proposed development will consist of a total of 104 no. residential units (42 no. duplex units; 36 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 and private open space;*
- (ii) *36 no. apartments within 2 blocks. Block A will be a 5 storey building with 18 no. apartments (5 no. 1 bed and 13 no. 2 bed units) with balconies/terraces to the north, east, south and west elevations, and bin, bicycle parking and plant at ground floor level and plant at roof level; Block B will be a 5 storey building with 18 no. apartments (5 no. 1 bed and 13 no. 2 bed units) with balconies/terraces to the east and west elevations and bin, bicycle parking and plant at ground floor level and plant at roof level;*
- (iii) *26 no. houses (comprising 5 no. 2 bed, 2 storey houses; 10 no. 3 bed, 2 storey houses; 11 no. 4 bed, 3 storey houses) in a mix of detached and semi-detached house types;*
- (iv) *Surface car parking as well as bike parking stores and bin stores;*
- (v) *1 no. ESB substation;*
- (vi) *Landscaping, new footpath and cycle path to Forest Road, boundary treatment and all associated site works necessary to facilitate the proposed development.*



They provided the following comments in relation to further consideration and further information to be set out in any planning application:

- **Siting, Scale, Massing and Design:** *“Further consideration should be given to the concerns raised regarding the scale and massing of the proposed five storey apartment blocks at the eastern location of the site, taking into account the rural and transitional nature of the site in relation to the adjoining Green Belt lands to the south. In particular the design, finish, roof profile and cantilevered style balconies should be reviewed at this prominent location adjoining the road. The applicant should reconsider reducing the building height of the apartments which are overbearing and in particular to the south, or recessing the upper floors and reassessing the proximity of the development to the road to reduce the perceived mass. The building shape provides an opportunity to provide semi recessed balconies to the corners without compromising daylight.”*
- *“The design of the proposed development as a whole 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. More detail is required to be provided regarding the proposed finishes and textures of all proposed units, which should include a variety of materials and textures. The position of the proposed units in Zone B directly*

on the boundary with the lands to the south (Greenbelt) is not appropriate, and the Planning Authority suggest introducing a landscaped buffer or other means of separation and reorientating these units with entrances and/or living spaces or windows from active rooms (e.g., kitchens, living rooms) overlooking the lands to the south. Zone E units in the western section of the site are considered remote and detached from the remainder of the proposal and should be reconsidered."

- *"Further consideration should be given to the overall layout of the proposal given the existing Hedgerow along the northern boundary which is a townland boundary and the indicated road proposal to the southern boundary. As per Objective DMSO128 & Objective SPQHO91 of Fingal's County Development Plan, a management plan should be provided to retain the hedgerow's historic value as a townland boundary. The applicant should demonstrate how the townland boundary hedgerow to the north of the site will be maintained and provided with supplementary planting to retain the hedgerow's historic value as a townland boundary and in this regard an Arboricultural Method statement is required. The pathway running east to west along the northern boundary should be continuous and not broken up. The layout of this path should be reconsidered, with input from the appointed arborist & landscape architect as the route is located within a "no dig zone".*
- *"The applicant must clearly demonstrate how it is proposed to meet Development Plan standards in terms of Public Open Space provision (Table 4.2 of the Development Plan). In this regard, it is important that Public Open Space is usable and that the central area is of large enough a scale to accommodate natural play and the Landscape Rationale document should be revised to clearly show the linear open space to the north as Environmental Open Space. Proposed open spaces shall be level and cross sections to illustrate same should be submitted with any application. The proposed pedestrian link between the subject site along the northern boundary into Ridgewood Green needs further consideration. Its current location does not link to existing paths in the adjacent site."*
- *"Given that the eastern portion of the site is within Noise Zone B of Dublin Airport and the western section within Noise Zone C, concern has been expressed at both meetings with the potential for excessive internal and external ambient noise at the proposed development. The Noise assessment submitted is noted, however with regard to the modelling of noise impacts, the applicants are requested to clarify what assumptions are made for the modelling of aircraft noise on the site and to provide separate results (drawings) showing the predicted impacts from aircraft and road noise on the site at the 3 heights already used. Further details on the source of the night-time Maximum Noise Events are required. The applicant also should clarify whether the sources are either Aircraft or Road related (or both). The proposed buildings on the eastern side of the site should be reorientated so the balconies can be facing away from the road noise source. The mitigation proposed in the form of noise barrier walls are not considered favourably, however further details should be submitted on these noise barrier walls proposed for the site to include locations, drawings which illustrate dimensions, construction materials to be used and final finishes. A Visual Impact Assessment of the overall proposal should also be submitted."*

- **Transportation Consideration:** *“The exact location of the ‘pedestrian link into adjacent open space’, as shown on the ‘proposed site layout plan’ should be given further consideration in regard to the layout of the adjacent existing development to the north.”*
- *“The Planning Authority have a strong preference that a verge and street trees would be provided between the road edge and the southern boundary wall/fence, along the main internal access road along the southern boundary of the site; this would be beneficial to ensure a safe distance between the road carriageway and hard edge; and would also help screen the proposed development from the potential future road objective directly adjacent to the south.”*
- *“The applicant should give further consideration to the layout of the pedestrian route/greenway that runs east-west on the northern side of the site, to provide continuous uninterrupted connectivity.”*
- *“Further consideration should be given to the layout of the main internal access road along the southern boundary of the site, from the perspective of DMURS, to help calm the traffic and along the straight section of road.”*
- *“The applicant should give further consideration to the ‘entry treatment’ to the ‘shared surface/homezones’; taking cognisance of the ‘NTA Active Travel Guidance Note on Junction Tightening Schemes’; and DMURS Advice Note 6 - Priority Junction Tightening Measures.”*
- *“The road carriageways in the ‘shared surface/homezones’, should ideally have a different surface colour from the other standard road carriageways, such as a red asphalt surface (we can provide the acceptable FCC specification for the material). There is clear advice on this in DMURS.”*
- *“Further consideration given to the layout of the specific cul-de-sac/‘homezone’ located second from the western side (i.e. the street between ‘zone c’ and ‘zone D’), which is dominated by perpendicular parking on both sides. The applicant should consider ‘breaking-up’ the parking dominance by potential introduction of a landscaping strip, or potentially providing parallel parking on one side and perpendicular on the other (as is recommended in DMURS) and the applicant should also take cognisance of page 121 of DMURS (section 4.4.9) which describes dimensions for carparking, and may need to consider making the carparking bays wider (i.e. potentially 2.6m in this scenario) in order to allow cars to be able to exit/enter the spaces in one movement.”*
- *“The applicant should demonstrate that the dimensions of the carparking spaces is sufficient and that they comply with the DMURS guidance, and Part M at house entrances, where necessary.”*
- *“Further consideration to the detail where parking spaces with permeable paving are located directly adjacent to road carriageways, with consideration for a construction detail preventing the road build up being undermined by surface water should be considered.”*
- *“It is recommended that a dedicated carparking drawing be developed to clearly outline the proposed carparking strategy and identify which carparking spaces are assigned to which unit/block.”*
- *“The applicant should give further consideration to the proposed footpath and boundary setback along Forest Road as follows:*

- A new concrete kerb along the entire length of road carriageway fronting the proposed development, with associated drainage gullies to drain into the existing surface water infrastructure on Forest Road.
- A 1.5m wide grass verge (a 1m wide verge is generally required, in this case we require an additional 0.5m to allow for future potential widening of the road carriageway)
- A 2m wide cycletrack.
- A 2m wide footpath.”
- “A stage 1 Road Safety Audit, carried out by an independent 3rd party, in compliance with the TII Publication ‘Road Safety Audit GE-STY-01024’ should be provided. It should ideally be carried out on the final layout proposed/intended for planning permission submission.”
- “The applicant should provide the fully developed layout and details of the bicycle parking provision for mid-terrace units and duplex units.”
- “The applicant should address Section 14.17.10 of the Fingal Development Plan 2023-2029; which describes that all of the ‘non-in-curtilage/on-street’ residential carparking spaces (i.e. that don’t have access to provide their own EV charging infrastructure) shall incorporate functioning EV charging points at a minimum rate of 20% of the proposed parking spaces, and appropriate infrastructure (e.g. ducting) to allow for future fit out of a charging points at the remaining 80% of residential non-in-curtilage/ on-street parking spaces. Publicly accessible EV parking spaces shall be clearly marked and be capable of communicating usage data with the National Charge Point Management System.”
- “The Transportation Planning Section has a strong preference that the pedestrian/greenway routes are sufficiently illuminated with public lighting, and coordination with the requirements of the Councils Public Lighting Section, the Parks and Green Infrastructure Division, and Ecologist may be required.”
- **Water Services Consideration:** “As per 18th December 2024 confirmation of pre-connection feasibility is awaited.”
- Indication is required as to if pumping is required, notably...”In the event that a pumping station is indeed required a minimum buffer zone of 35m is required in accordance with IUO7 of the CDP and this will necessitate significant re-design of the current layout.”
- “The applicant is requested to confirm whether a ground investigation has been carried out and to include this report with any further submission. This should be used to inform the surface water drainage strategy and indeed to affirm any assumptions that have been made with regards to permeability, groundwater, SOIL value used in the Qbar calculation, etc.”
- “The site has been divided into two catchment areas. The report contains anomalies regarding site areas and discharge rates which need to be homogenised throughout, such as:
 - Qbar has been calculated as 10.86 l/s however the proposed total is $7.91 + 3.75 = 11.66$ l/s.
 - The sum of the two catchments equal 2.29ha whereas the site is stated to be 2.145ha.
 - The calculations also refer to a flow controlled to 4.8 l/s whereas this is elsewhere in the report referenced as 3.75 l/s.
 - The applicant is requested to clarify the positively drained site area.”

- *“The detention basin system located with the open space need to be developed and details provided such as depth, side slopes, depth of water, freeboard, etc. Sections must be provided to visually demonstrate its characteristics and appearance in the context of the wider land/streetscape.”*
- *“The attenuation tank system located within the homezone area of the apartment buildings will not be Taken-in-Charge. The applicant is requested to submit a TiC drawing reflecting this.”*
- *“The proposed outfall sewer to which the applicant intends to connect into appears to incorporate an attenuation function. The applicant’s site may or may not have been allowed in the design of this system and any additional discharge (even at Qbar) may result in surcharging the system and increasing flood risk elsewhere. It is noted that the system discharges into the Sluice river traversing Forrest Fields Golf Course which has been mapped as flood zone areas in the FEMFRAMS study.”*
- **Parks and Green Infrastructure Considerations:** *“The applicant is requested to show how the townland boundary hedgerow to the north of the site will be maintained and provided with supplementary planting to retain the hedgerow’s historic value as a townland boundary. An Arboricultural Method statement is required.”*
- **Public Open Space Considerations:** *“The on-site public open space provision requires further work as the extent of SUDS within the open space is unknown.”*
- *“The Landscape Rationale Document should be revised to clearly show the linear open space to the north as Environmental Open Space.”*
- *“The proposed pedestrian link between the subject site along the northern boundary into Ridgewood Green needs further consideration. Its current location does not link to existing paths in the adjacent site.”*
- *“The path way running east to west along the northern boundary should be continuous and not broken up, the applicant need to discuss the layout of this path with the arborist & landscape Architect as the route is in a “no dig zone”.*
- *“The proposed trees along the road boundary need to be removed to facilitate sightlines, thus this should be reflected on the landscape plan to accurately reflect the proposed development. Transition between Greenbelt and RS zoning – the applicant has not shown hedgerow planting along this southern boundary as requested.”*
- *“A clear statement and drawing are required detailing the proposed Public Open Space provision in accordance with Development Plan standards (refer to table 4.2 of development plan). The statement should directly relate to a drawing which indicates the proposed Open Space provision shown in square metres. This drawing should show the following in square metres:*
 - *Public Open Space*
 - *Private/Communal Open Space*
 - *Environmental open space*
 - *Proposed SuDS on Open Space areas”*

- *“The area required for play provision is 416 sq m. A minimum 25m separation distance is required between residential units and the proposed play facility. Play provision shall not be located in SuDS areas.”*
- *“A street tree plan is required. Lamp standards and location of constructed tree pits to be clearly shown (7m separation distance between lamp standards and trees).”*
- Regarding the Landscape Plan – *“The tree/hedgerow footprint (as shown on the Tree Survey) to be clearly shown on the landscape plan. Any SuDS features (as shown on the drainage drawings) to be clearly shown on the landscape plan- Slopes 1:5. Cross sections between the public open space areas to the north (to include houses, road and open space) and the proposed open space / tree /hedgerow area to the south to be provided. Cross sections to the western, eastern and southern boundaries to be provided.”*
- *“Passive supervision along the northern boundary is critical to design out anti-social behaviour.*
- *The applicant should ensure that there are no buildings such as bin stores, ESB substations on open space areas (in order to avoid anti-social behaviour).”*
- Regarding Taking-In-Charge – *“Areas to be taken in charge should be outlined using a thin line (as opposed to block colour). There should be no ambiguity of what is private or public on a drawing or on the ground.”*
- **Environment – Air and Noise Clarifications:** *“Applicants are requested to clarify what assumptions are made for the modelling of aircraft noise on the site and to provide separate results (drawings) showing the predicted impacts from aircraft and road noise on the site at the 3 heights already used.”*
- *“Further details on the source of the night-time Maximum Noise Events are required. The applicant should clarify are they due to Aircraft or Road sources.”*
- *“The proposed buildings on the eastern side of the site should be reorientated so the balconies can be facing away from he can be orientated to have balconies facing away from the road noise source.”*
- *“Further details are required on the noise barrier walls proposed for the site to include locations, drawings which illustrate dimensions, construction materials to be used and final finishes.”*
- **Heritage Considerations:** *“Geophysical survey of the site by a suitably qualified and experienced archaeological geophysicist”*
- *“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.”*
- *“On completion of the geophysical survey and test-excavation, the archaeologist shall submit a written report including archaeological impact statement, to the Planning Authority and to the Department of Housing, Local Government and Heritage for consideration.”*
- **Public Lighting Considerations:** *“TIC drawing required.”*

- *“Required, scaled drawing showing the locations of all public lighting columns and section pillars.”*
- *“Required, proposed lighting class and lighting levels to be stated on the drawing.”*
- *“Required, column and luminaire details to be included on the drawing.”*
- *“Required, hinged columns must be used where there is less than 3.5 metres horizontal clearance on a path, or in areas inaccessible to a vehicle-mounted hoist.”*
- *“All public lighting infrastructure must be located in public area or areas proposed to be taken in charge.”*
- *“All landscaping, trees and traffic calming measures must also be shown on the public lighting drawing.”*
- *“The required 7m minimum clearance between trees and public lighting columns must be adhered to.”*
- *“The existing public lighting locations at the site entrances and along the site boundary must also be included on the drawing.”*
- *“Lighting calculation report preferably in Lighting Reality format, with separate calculation grids for different parts of the site (e.g. overall, paths around open spaces, site entrances, along the main road, home zone areas, etc. Note, all calculation grids must cover back of path to back of path).”*
- *“Lighting calculation report preferably in Lighting Reality format, with separate calculation grids for different parts of the site (e.g. overall, paths around open spaces, site entrances, along the main road, home zone areas, etc. Note, all calculation grids must cover back of path to back of path.).”*
 - *Luminaire maintenance factor, colour temperature, mounting height, angle of tilt, outreach, and proposed luminaires to be included in the calculation report.*
 - *The lighting standard and lighting class the proposed scheme is designed to, must also be stated in the report.”*
- *“Isolux contour drawing of the proposed lighting levels.”*
- *“Proposed ducting layout including all access chambers, proposed public lighting section pillars and ESB Networks section pillars.*
 - *All public lighting ducting must be in public areas and with the exception of road crossing ducts, they must be located in footpaths.*
 - *Product data sheets and drawings of proposed public lighting infrastructure (luminaires, columns, cables, ducting, section pillars, access chambers).*
 - *Fingal County Council LED Technical details sheets to be completed for each proposed luminaire.*
 - *With regards to colour temperature of proposed luminaires, . Fingal County Council policy is neutral white except in limited specific circumstances that are to be agreed with Fingal County Council Public Lighting in writing”.*
- *“Circuit schematics and volt-drop calculations for the proposed circuits are required.”*
- *“Details of proposed protection measures of how the public lighting infrastructure will be protected in the homezone shared surfaces areas. Note Items 1-8 will also be required to be resubmitted at compliance stage, to ensure the scheme is being built as agreed.”*

- **Environment -Waste Management:** *“An operational Waste Management Plan is required.”*
- **Part V Considerations:** *“The Planning Authority request that the developer review Part V of the proposal as per Fingal County Councils Development Plan 2023-2029, to ensure that 30% of the Part V units are universal designed and that 10% of the entire residential development should be age friendly accommodation. A revised Part V proposed should be submitted.”*

It is noted that a stand-alone report outlining the applicant’s Response to the Planning Authority’s Section 32D Opinion, prepared by DOWNEY, is submitted under separate cover. The applicant and design team have taken full cognisance of the Planning Authority’s consideration and made the necessary amendments to the overall design to ensure that it is consistent with the request of the Planning Authority. In this regard, the Architectural Design Statement, prepared by Crawford Architecture and submitted under separate cover, sets out in detail the rationale for the design and layout of the scheme and how it has evolved during the course of the pre-planning consultation process.

4.0 PART V ENGAGEMENT

Part V of the Planning and Development Act, 2000 (as amended) applies to the proposed development. In order to reach an agreement regarding compliance with Section 96 of Part V of the Planning and Development Act, 2000 (as amended), the applicant engaged with the Housing Department of Fingal County Council on behalf of the applicant. It is submitted that the proposed development is subject to 20% Part V provision. A Part V validation letter was obtained from Fingal County Council for the proposal. In addition, we respectfully invite the Council to refer to the enclosed Part V drawing prepared by Crawford Architects.

5.0 DESCRIPTION AND RATIONALE OF PROPOSED DEVELOPMENT

The proposed development, as per the description contained within the statutory planning notices, provides for:

“We, Golden Port Homes Limited, intend to apply for permission for a Large-scale Residential Development on lands at Forest Road, Swords, Co. Dublin. 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”.

The key characteristics of the proposed development are set out below for the convenience of the Council:

Site Area	5.15ha
Residential Zoned Area	2.14
Open Space Zoned Area	3.01
Units	109
Housing Unit Types	Apartment – 1 bed Apartment – 2 bed Apartment – 3 bed House type A – 3 bed, 3 storey x 59 House type B – 4 bed, 3 storey x 4 House type C – 2 bed, 2 storey x 7 House type D – 2 bed, 2 storey x 7 House type E – 2 bed, 2 storey x 7
Gross Floor Area	9,737.7 sq.m
Building Footprint	4,243.5 sq.m
Dual Aspect	78% (of apartments)
Public Open Space	2.673 sq.m (12%) on the Residential Zoned land, excluding Environmental Open Space. Plus 3.01 hectare of public open space within the Greenbelt Zoned land.
Communal Open Space	1,018 sq.m.
Net Density	51 units/hectare (on Residential Zoned land)
Car Parking spaces	96
Disabled Car Parking Spaces	5
Residential Bicycle Parking spaces	243
Visitor Bicycle Parking spaces	22
Site Coverage	21.75% (of Residential Zoned land)



Figure 5. Proposed Site Layout Plan prepared by Crawford Architects

The proposed development represents a sustainable and strategic response to the ongoing housing demand in the Fingal region. Primarily situated within an RS-zoned area and benefiting from close proximity to both existing and planned high-capacity public transport corridors, the subject site is well placed to accommodate a high-density residential scheme. This is fully in line with national and regional policy objectives including the National Planning Framework (NPF), Project Ireland 2040, and the Fingal County Development Plan 2023–2029, which all promote compact growth, the efficient use of serviced land, and transit-oriented development.

The scheme provides for a diverse mix of unit types, including one, two, three, and four-bedroom residential units, carefully designed to reflect market demand and accommodate for a broad spectrum of household types, from single professionals to growing families and older residents, which will benefit from the provision of Universal Design units. This approach fosters a balanced, inclusive, and enduring community that can grow and evolve within a high-quality urban setting.

Importantly, the development responds to the objectives of the RS zoning by ensuring that the land is used efficiently while enhancing the residential character of the area. The site, currently underutilised, is strategically located within a well-connected part of Swords, benefitting from excellent access to bus services and future transport upgrades. This supports a modal shift towards sustainable travel and strengthens the case for higher-density housing in such a location.

The design and layout of the scheme prioritises a pedestrian-friendly environment, with a clear hierarchy of movement, generous footpaths, shared surfaces, and attractive public realm areas that promote safety, accessibility, and social interaction. The integration of high-quality landscaped open spaces and the retention, where possible, of mature trees will also contribute to a strong sense of place and community identity.

Furthermore, the applicant in this instance is proposing to bring forward a large Class 1 area of Public Open Space that will benefit not only the future residents of this scheme but also existing residents

from the surrounding area. This will be located on the southern part of the site and, extending to 3.14 hectares, will include a MUGA, paths and play area as well as general open space and landscaping. Extensive tree planting is also proposed here, which will act as a visual barrier to the airport and create a high-quality buffer and transitional zone between the urban development of Swords, including the new residential area, and the Green Belt lands to the south. Access into the site is to be from a new access off Forest Road, which can act as the initial phase of the proposed Distributor Road, as indicated in the zoning map for the area. This is a significant community gain for Swords.

In terms of infrastructure and environmental resilience, the development proposes a comprehensive Sustainable Urban Drainage System (SuDS) strategy, including permeable surfaces and attenuation measures to manage surface water. Many of these measures are sensitively located on the GB-zoned portion of the site's southern boundary, ensuring the continued protection of green belt land in line with the objectives of the Development Plan. This thoughtful integration of SuDS infrastructure within the landscape contributes both to the safeguarding of the green belt and the ecological value of the site.

The proposal is therefore fully consistent with the principles of proper planning and sustainable development, reflecting current best practice in placemaking, environmental stewardship, and community-focused design. It will deliver a meaningful contribution to local housing supply without compromising the ecological or visual integrity of the surrounding area.

DOWNEY is of the considered opinion that the proposed development is ideally suited to the site, responding sensitively and effectively to its context. The Planning Authority is invited to refer to the detailed architectural drawings and supporting documentation prepared by Crawford Architects, which further demonstrate the scheme's appropriateness and alignment with statutory planning policy.

Building Height and Density

The proposed development will have a net residential density of 51 units per hectare. This is consistent with the standards set out in the Sustainable Residential Development and Compact Settlement Guidelines as they relate to Swords. We note that at the initial Pre-planning meeting with Fingal Co. Co. for a sub 99-unit scheme in February of 2024, the Planning Authority suggested that a density closer to 50 units per hectare would be more appropriate for the site.

The density and indeed the building height strategy was carefully considered to provide a staggered approach to building heights, with the more dense and taller elements beside the adjoining Forest Road and the tallest apartment block being on the Ridgewood side of the site, before it steps down towards the south as it addresses the Greenbelt zoned land and proposed public park.



Figure 6. Building Height Strategy

Residential Mix

The scheme provides for an excellent mix of units and typologies, including houses, duplex units and apartments. This ensures that a community for all ages and needs will be created at Forest Road.

Apartment Mix		
Unit Type	No.	%
1 bed apartment	18	44%
2 bed apartment	23	56%
Total	41	100%
Duplex Mix		
Unit Type	No.	%
1 bed duplex	21	50%
3 bed duplex	21	50%
Total	42	100%
Housing Mix		
Unit Type	No.	%
2 bed houses	5	19.2%
3 bed houses	10	38.5
4 bed houses	11	42.3%
Total	26	100%

Public Open Space

Public Open Space is provided throughout the scheme. There are 2 main areas of public open space within the residential zoned part of the site. These will create informal kick-about and play areas for residents and visitors and are suitably overlooked to ensure excellent passive surveillance. These 2 areas of public open space extend to 12% of the zoned part of the site and thus are consistent with the requirements of the Development Plan. It is important to note that strips of Environmental Open Space, such as beside the road and on the northern boundary, are not included in this calculation.

A new public park is being created on the Green Belt zoned part of the site, south of the main road. This will contain a play area and MUGA and serve the wider area as well as the proposed scheme.

For further details, please refer to the enclosed landscape plans and report prepared by RMDA Landscape Architects.



Figure 7. Open Space Provision

Movement and Permeability

Movement and permeability have been an important design considerations throughout the design process and pre-planning consultation. Connectivity from north to south and also east to west are evident in the layout. A new walking trail is included along the northern boundary of the site, designed in a no-dig manner below the tree line, it will offer connectivity along the northern fringe of the site and potentially into Ridgewood to the north. The scheme has been designed such that a connection into Ridgewood could be facilitated between the existing open space in Ridgewood and the proposed Open Space 1 in this development. RMDA have prepared a drawing how this could be provided. Given that Ridgewood is not in the control of the applicant, no works are proposed on the Ridgewood site, but rather the drawing is conceptual.

New footpaths and cycle paths, which are fully DMURS compliant, are proposed along the new access road. This access road has been designed in a similar way to that of the new road at the Miller's Glen area of Swords.

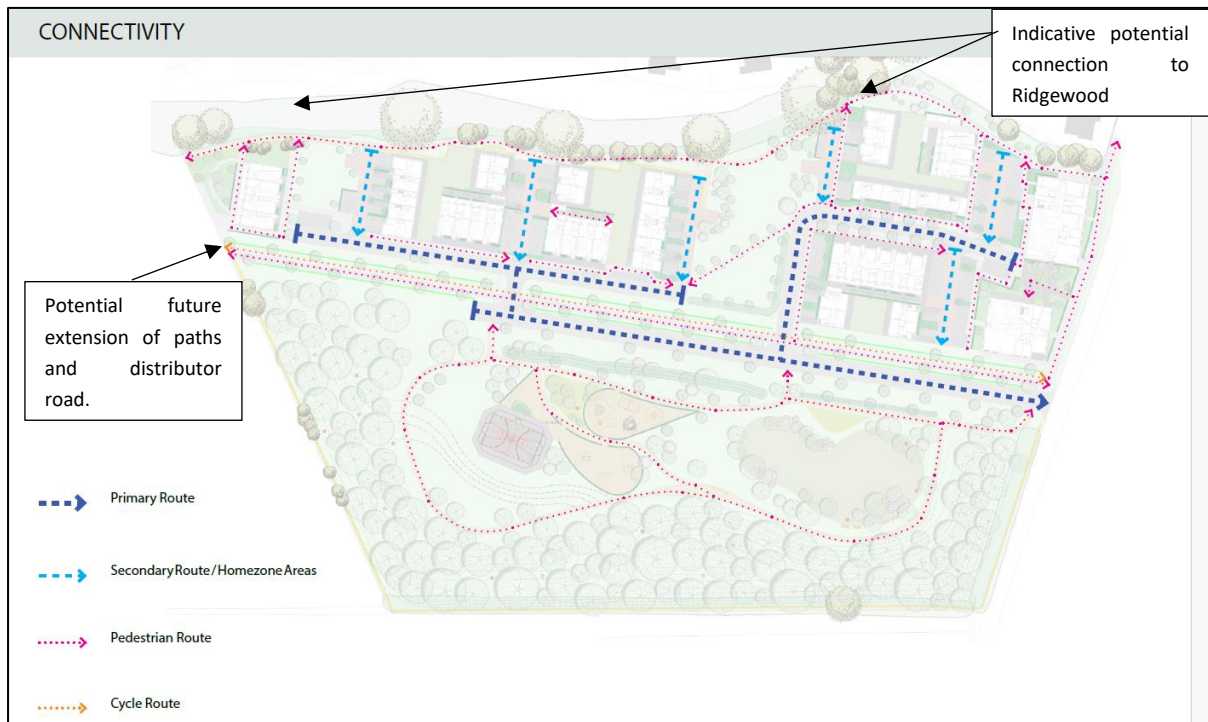


Figure 8. Permeability and Connectivity

Car Parking

Car parking is all proposed at surface level, with a total of 96 spaces proposed. All spaces will be EV compatible. The total provision of parking is consistent with the Development Plan and the national Guidelines. While less than 1 space per apartment is provided, a Mobility Management Plan has been prepared by BMCE engineers and included as part of the application. This sets out the justification and rationale for a reduced quantum of parking and how this would be managed.

Bicycle Parking

Bicycle will be provided in a mix of gardens for the houses, secure bicycle stores for the duplex units and within secure ground floor rooms within apartment Blocks A & B. Bicycle parking for apartments will be for standard bikes and alternative bikes and bicycle lockers/stores will also be provided within these units. This high-quality provision will assist in supporting a modal shift away from the private car and towards sustainable transport.

Noise Considerations

It is noted that the site is located to the north of Dublin Airport and its northern runway and is effected by Noise Zones under the Development Plan. In this regard, Wave Dynamics were appointed to prepare detailed Acoustic Design Statement into the scheme. Following a review of the noise levels on the site including the LAFmax and LAeq the site has been characterised as medium to low risk for the daytime period and medium to high risk for the nighttime period therefore mitigation measures are not required to control the onset noise levels. Some of the amenity space for Block A

may be just below the target, but there is sufficient alternative amenity space being provided, which meets the target levels.

Based on the recommendations in the Wave Dynamics report it is predicted that the internal and external noise levels will achieve the targeted internal noise levels in line with BS 82233:2014 and ProPG 2017 guidance.

Refuse

Secure refuse storage will also be provided at ground level of the apartment blocks and in bin stores beside the duplex units. Details of these stores are included in the architectural plans prepared by Crawford Architecture.

4.0 PLANNING POLICY AND CONTEXT

The proposed development is consistent with all relevant national, regional, and local planning policies and guidance as pertained to that of the subject lands and immediate and wider context. In this regard, Part B of this report contains a Statement of Consistency with Planning Policy. In order to avoid undue repetition, Fingal County Council are invited to refer to Part B of this report to confirm how the proposal is consistent with the relevant national, regional, and local planning policy.

Notwithstanding that, it is important to confirm the fundamental planning policies as they relate to the site, particularly land use zoning.

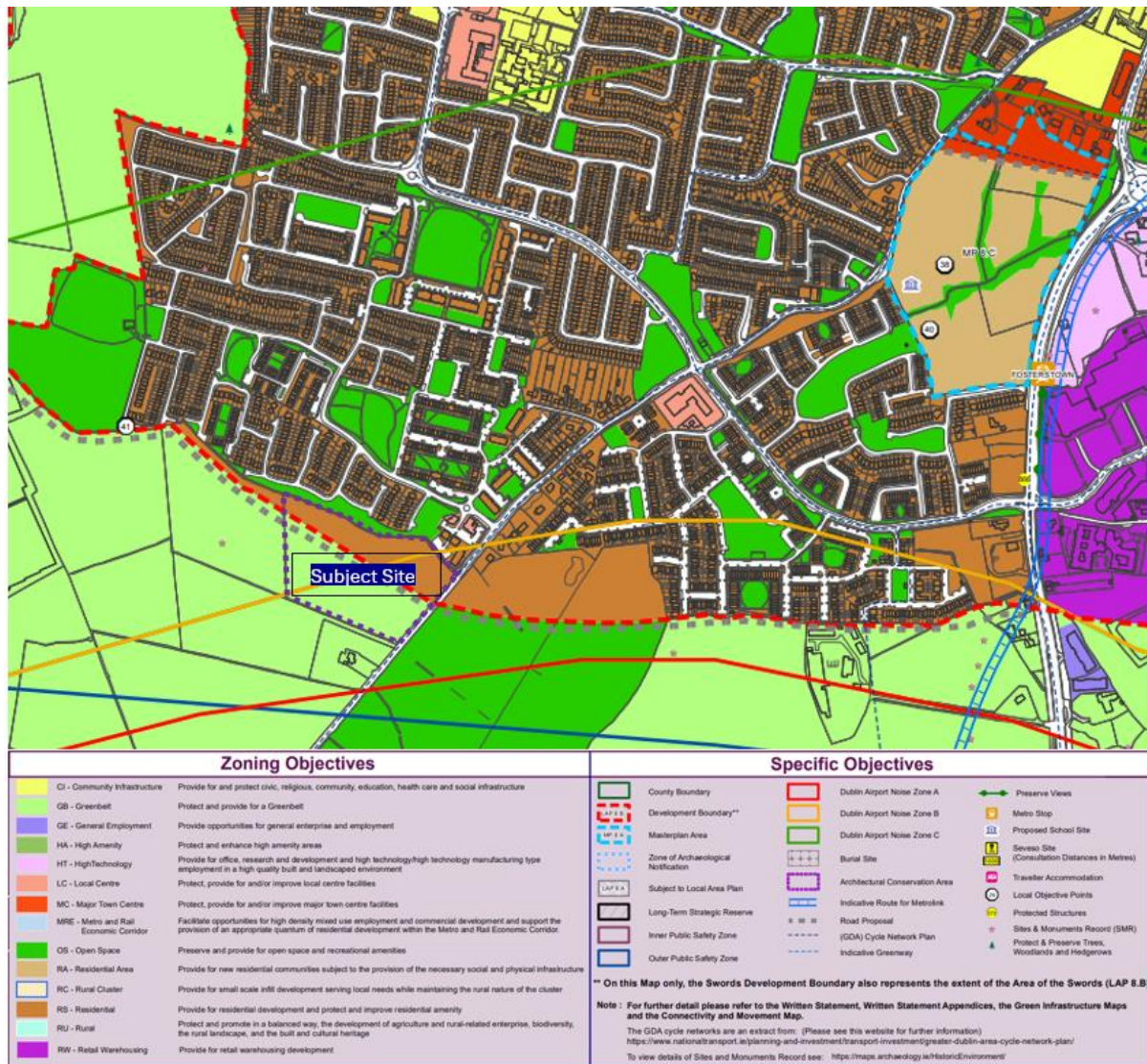


Figure 9. Land Use Zoning Map Extracted from the Development Plan (application site outlined in purple dash)

Under the Fingal Development Plan 2023-2029, the majority of the subject site sits partially within the following zoned areas.

The northern element of the subject site: zoned “RS - Residential” – its objective: “Provide for residential development and protect and improve residential amenity.”

The vision for this objective seeks to:

“Ensure that any new development in existing areas would have a minimal impact on and enhance existing residential amenity.”

USE CLASSES RELATED TO ZONING OBJECTIVE

Permitted in Principle		
Bed and Breakfast	Childcare Facilities	Community Facility
Education	Guest House	Office Ancillary to Permitted Use
Open Space	Residential	Residential Care Home/ Retirement Home
Retirement Village	Sheltered Accommodation	Traveller Community Accommodation
Utility Installations		

Figure 10. RS Land Zoning Objective Extracted from the Development Plan

The southern element of the subject site: zoned “GB – Greenbelt” – its objective: *“Protect and provide for a Greenbelt.”*

The vision for this objective seeks to:

“Create a rural/urban Greenbelt zone that permanently demarcates the boundary (i) between the rural and urban areas, or (ii) between urban and urban areas. The role of the Greenbelt is to check unrestricted sprawl of urban areas, to prevent coalescence of settlements, to prevent countryside encroachment and to protect the setting of towns and/or villages. The Greenbelt is attractive and multifunctional, serves the needs of both the urban and rural communities, and strengthens the links between urban and rural areas in a sustainable manner. The Greenbelt will provide opportunities for countryside access and for recreation, retain attractive landscapes, improve derelict land within and around towns, secure lands with a nature conservation interest, and retain land in agricultural use. The zoning objective will have the consequence of achieving the regeneration of undeveloped town areas by ensuring that urban development is directed towards these areas.”

USE CLASSES RELATED TO ZONING OBJECTIVE

Permitted in Principle		
Agricultural Buildings	Agri-Tourism	Bed and Breakfast ³
Boarding Kennels ³	Burial Grounds ²⁹	Childcare Facilities ³
Community Facility	Farm Shop ²⁰	Golf Course
Guest House ³	Health Practitioner ³	Holiday Home/Apartments ⁷
Office Ancillary to Permitted Use	Open Space	Recreational/Sports Facility
Research and Development ¹⁴	Residential ⁴	Restaurant/Café ¹³
Veterinary Clinic ²¹	Campsite ²⁵	

Figure 11. GB Land Zoning Objective Extracted from the Development Plan

The proposed residential development of 109 units, comprising a mix of duplexes, apartments, and houses on the subject lands represents a high-quality, sustainable scheme that aligns closely with both the zoning objectives and strategic planning policies set out in the Fingal County Development Plan 2023–2029.

The northern portion of the site is zoned “RS – Residential”, with the objective to *“Provide for residential development and protect and improve residential amenity.”* The vision for this zoning

explicitly encourages the creation of high-quality residential environments with well-considered layouts, a variety of house types and tenures, strong access to public transport and active travel routes, and proximity to community facilities.

The proposed scheme directly supports those aims by delivering a balanced and diverse housing mix, including 1, 2, 3, and 4-bedroom units suited to a range of household types and life stages. The layout has been designed to foster a compact, walkable community that integrates well with the existing urban fabric. It includes pedestrian and cycle linkages, a new vehicular and pedestrian entrance from Forest Road, and public open space, all of which contribute to connectivity, permeability, and social integration.

Furthermore, the site benefits from strong access to existing and planned public transport networks, making it an ideal location for higher-density development that supports modal shift and compact growth objectives under both national and regional policy frameworks.

While the southern portion of the site is zoned “GB – Greenbelt”, which carries the objective to *“protect and provide for a Greenbelt.”* The proposal respects and complements this zoning by limiting development to the RS-zoned lands and sensitively integrating Sustainable Urban Drainage Systems (SuDS) and recreational uses, including open communal space and a sports pitch within the GB-zoned lands. This approach ensures the greenbelt continues to function as a buffer zone between urban areas, preventing sprawl and encroachment, while also offering valuable recreational and ecological amenities that benefit both new and existing residents.

In doing so, the proposal aligns with the Greenbelt vision to provide multifunctional spaces that serve both urban and rural needs, support biodiversity, and enhance the setting of the town. The use of the GB-zoned portion for non-intrusive, landscape-led infrastructure and recreation is an appropriate and policy-compliant means of safeguarding the long-term function of the greenbelt while enhancing community wellbeing and landscape character.

In conclusion, the proposed development demonstrates a clear and thoughtful response to the planning and zoning context of the subject lands, while achieving a sensitive balance between development and environmental protection, embodying the principles of sustainable, inclusive, and compact urban growth, making a positive contribution to the long-term vision for Swords as a vibrant, well-served, and connected urban centre.

5.0 ENGINEERING PROPOSALS

Barrett Mahony Consulting Engineers (BMCE) have prepared a detailed engineering pack for the proposed development. This is included under a separate cover. The drainage for the scheme has focussed on nature-based solutions in so far as possible and the engineers and landscape architects have worked closely together in this regard. The scheme will comprise a mix of SuDS measures, including attenuation basins, swales, tree pits and green-blue roofs.

A Confirmation of Feasibility (COF) letter has also been obtained from Uisce Éireann, for which confirms that connections are feasible.

Furthermore, the Flood Risk Assessment, prepared by Barrett Mahony Consulting Engineers, confirms that flooding considerations in regard to the site and the surrounding context have been considered and assessed as appropriate. Notably, as where necessary, mitigation measures have been proposed.

As a result of the proposed mitigation measures, the residual risk of flooding from any source is low. For further details in this regard, please refer to the Barrett Mahony Consulting Engineers, submitted under separate cover of this LRD application.

6.0 ENVIRONMENTAL CONSIDERATIONS

6.1 Appropriate Assessment Screening

The proposed development has been screened for Appropriate Assessment in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/32/EEC). Altamar Environmental Consultants has prepared an Appropriate Assessment report for the proposed development. For further information in this regard, please refer to the Appropriate Assessment Screening report prepared by Altamar Environmental Consultants, submitted under separate cover of the application.

6.2 Ecological Impact Assessment (EclA)

An Ecological Impact Assessment (EclA) has been prepared by Altamar Environmental Consultants in accordance with best practice guidelines issued by the Chartered Institute of Ecology and Environmental Management (CIEEM). Please see the EclA submitted under separate cover of the application.

6.3 Environmental Impact Assessment Screening

The proposed development has been screened for the purposes of EIAR (separate cover), which confirms that this development falls below the threshold and requirement for the preparation of an EIAR.

7.0 CONCLUSION

DOWNEY, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this Planning Report and Statement of Consistency with Planning Policy, on behalf of our client Golden Port Homes Limite., to accompany a proposed Large-Scale Residential Development (LRD) on lands at Forest Road, Swords, Co. Dublin. The proposed development provides for the construction of 109 residential units in a mix of detached and semi-detached house types; and all associated site infrastructure and engineering works necessary to facilitate the development including a temporary foul water pumping station

The proposed development will provide for a sustainable residential development on appropriately zoned lands, in an accessible location within the development boundaries of Swords, which will promote compact urban growth and a good quality of life. This in turn will further support the compact growth of the town itself and assist in meeting the increasing demand for residential accommodation within Swords for which is recognised as one of the fastest growing urban towns within Ireland.

PART B – STATEMENT OF CONSISTENCY WITH PLANNING POLICY

The following demonstrates that the proposed development is consistent with the relevant national, regional, and local planning policy. This should be read in conjunction with the accompanying detailed documentation prepared by the Design Team.

1.0 NATIONAL PLANNING POLICY

The key provisions of the national planning policy, in regard to that of the proposed development are set out in the following section. These are as follows:

- Project Ireland 2040 – National Planning Framework (Revised 2025)
- Project Ireland 2040: National Development Plan 2021-2030
- Housing for All; A New Housing Plan for Ireland
- Housing for All; Plan Update 2024
- Affordable Housing Act 2021 & Housing Circular 28/2021
- The Housing Agency Statement of Strategy 2022-2024
- Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities 2024
- The Design Manual for Quality Housing (2022)
- Urban Development and Building Height Guidelines for Planning Authorities 2018
- Sustainable Urban Housing: Design Standards for New Apartments, 2023
- Childcare Facilities: Guidelines for Planning Authorities 2001
- Childcare Facilities Operating under the Early Childhood Care & Education (ECCE) Scheme (Circular Letter: PL 3/2016)
- Design Manual for Urban Roads and Streets (DMURS)
- Smart Travel: A Sustainable Transport Future
- Cycle Design Manual 2023
- Birds and Habitats Directive – Appropriate Assessment
- The Planning System and Flood Risk Guidelines
- All-Ireland Pollinator Plan 2021-2025
- National Adaption Framework: Planning for a Climate Resilient Ireland 2024
- Climate Action Plan 2024

1.1 Project Ireland 2040: National Planning Framework (Revised 2025)

The Revised National Planning Framework was published on 8th April 2025. It states that *“This Framework is revised and updated to take account of changes that have occurred since it was published in 2018 and to build upon framework that is in place. It is a framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment – from our villages to our cities, and everything around and in between.”*

The Revised NPF goes on to add, *“In the period between 2022 and 2040 it is expected that there will be roughly an extra one million people living in our country. This population growth will require new*

jobs and new homes. If we fail to plan for this growth and for the demands it will place on our built and natural environment, as well as on our social and economic fabric, then we will certainly fail in our responsibility to future generations of Irish men and Irish women. That responsibility is to ensure their prosperity and happiness in an ever-changing world."

The NPF outlines a number of strategies and policy objectives, emphasising upon the issue of compact growth and urban consolidation. Specifically in terms of 'compact growth', the NPF targets for up to 40% of all new future housing developments to be within and close to the existing footprint of built-up areas. It seeks to make use of under-utilised land and buildings, including infill, brownfield, publicly owned, vacant sites and that of under-occupied buildings.

The National Planning Framework (NPF) explicitly supports the densification of suburban greenfield sites like the subject site, and includes **National Policy Objective 35**, which states:

"Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights."

From a planning perspective, the following national policy objectives are of particular relevance to this proposal, as they align with the desired pattern of growth and development outlined in the NPF:

National Policy Objective 3: *"Eastern and Midland Region: 470,000 additional people between 2022 and 2040 (c. 690,000 additional people over 2016-2040) i.e. a population of almost 3 million."*

National Policy Objective 4: *"A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs."*

National Policy Objective 7: *"Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth."*

National Policy Objective 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."*

National Policy Objective 12: *"Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being."*

National Policy Objective 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."*

National Policy Objective 14: *"Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity, enhanced levels of amenity and design and placemaking quality, in order to sustainably influence and support their surrounding area to ensure progress toward national achievement of the UN Sustainable Development Goals."*

National Policy Objective 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.”

National Policy objective 22: *“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.”*

National Policy Objective 37: *“Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.”*

National Policy Objective 38: *“Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.”*

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

National Policy Objective 43: *“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”*

National Policy Objective 45: *“Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development.”*

National Policy Objective 68: *“Support the growth and development of efficient district heating, electrification of heating, and utilisation of geothermal energy.”*

National Policy Objective 69: *“Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions as expressed in the most recently adopted carbon budgets.”*

National Policy Objective 76: *“Sustainably manage waste generation including construction and demolition waste, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society.”*

National Policy Objective 78: *“Promote sustainable development by ensuring flooding and flood risk management informs place-making by: Avoiding inappropriate development in areas at risk of flooding that do not pass the Justification Test, in accordance with the Guidelines on the Planning System and Flood Risk Management; Taking account of the potential impacts of climate change on flooding and flood risk, in line with national policy regarding climate adaptation.”*

National Policy Objective 79: *“Support the management of stormwater, rainwater and surface water flood and pollution risk through the use of nature-based solutions and sustainable drainage systems, including the retrofitting of existing environments to support nature-based solutions.”*

National Policy Objective 80: *“Support the retrofitting of existing environments to cater for surface water run-off through the use of nature-based solutions.”*

National Policy Objective 83: *“Identify and strengthen the value of greenbelts and green and blue spaces at a regional, city and local scales, to enable enhanced connectivity to wider strategic networks and prevent coalescence of settlements and to allow for the long-term strategic expansion of urban areas. Promote and support an increase in the provision of green and blue spaces and tree canopy cover in settlements.”*

National Policy Objective 85: *“In line with the National Biodiversity Action Plan; the conservation, enhancement, mitigation and restoration of biodiversity is to be supported by: Integrating policies and objectives for the protection and restoration of biodiversity, including the principles of the mitigation hierarchy of - avoid, minimise, restore and offset - of potential biodiversity impacts, in statutory land use plan. Retention of existing habitats which are currently important for maintaining biodiversity (at local/ regional/national/international levels), in the first instance, is preferable to replacement/restoration of habitats, in the interests of ensuring continuity of habitat provision and reduction of associated risks and costs.”*

National Policy Objective 87: *“Enhance the conservation status and improve the management of protected areas and protected species by: Implementing relevant EU Directives to protect Ireland’s environment and wildlife and support the objectives of the National Biodiversity Action Plan; Developing and utilising licensing and consent systems to facilitate sustainable activities within Natura 2000 sites; Continued research, survey programmes and monitoring of habitats and species.”*

National Policy Objective 92: *“Ensure the alignment of planned growth with the efficient and sustainable use and development of water resources and water services infrastructure, in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.”*

As outlined in the Revised National Planning Framework (NPF), the overarching goal is to guide public and private investment in a manner that promotes opportunity, enhances quality of life, and protects the environment—from rural villages to major urban centres. A key pillar of the NPF is the targeted consolidation of growth within existing built-up areas, promoting compact, sustainable settlement patterns. It is respectfully considered that this development is consistent with these policies of the NPF as it will create a new residential community on zoned and serviced lands within the County Town of Swords. Green Infrastructure and nature-based SuDS have been designed into the scheme and townland boundaries, and biodiversity is being protected. Active travel is also being facilitated through the creation of new cycle lanes and pedestrian footpaths and connectivity to adjoining lands.

Aligned with this national direction, the **Fingal County Development Plan 2023–2029** identifies **Swords** as a **Key Town** within the **Eastern and Midland Region**, in accordance with the **Regional Spatial and Economic Strategy (RSES)**. Notably, this reflects Fingal’s long-term vision for Swords to evolve into the County Town and, ultimately, a city of regional significance. Central to this vision is a strategy of compact growth, focused urban expansion, and the sequential development of Swords, underpinned by high-quality placemaking and public realm enhancements.

The proposed development represents a high-quality residential scheme located within an established and predominantly residential area of Swords. The scheme will deliver a total of 109 residential units in the form of houses, duplex units and apartments at a density of 51 units per hectare, which is considered appropriate to the site's urban context.

As previously mentioned, the site is exceptionally well-served by transport infrastructure and local amenities. Within a 3-minute walk (210m), residents will have access to a supermarket, medical centre, pharmacy, and pre-school. Additional nearby facilities include Forest Little Golf Club (600m), a gym (650m), Boroimhe Shopping Centre (800m), Cedar Playground and Ridgewood Park (1km), and educational facilities such as Holy Family Junior and Senior Schools (1.4km).

While from a transport perspective, the site benefits from excellent connectivity, with direct access to the R132 and M1, and proximity to **Dublin Airport** (8 minutes by car). It is also well-served by public transport, including multiple Dublin Bus routes (102, 41B, 41C, 505, 505X, 500X, 503, 507), and future enhanced connectivity via the **Fosterstown Metrolink Station** (1.5km) and the **BusConnects L81** orbital route.

On this basis, DOWNEY is of the considered opinion that the proposed development is fully consistent with the objectives of the National Planning Framework, particularly those relating to compact growth, sustainable settlement patterns, and the efficient use of serviced, well-connected urban land.

These conclusions are further supported by regional and local policy objectives, which are addressed in the subsequent sections of this report.

1.2 Project Ireland 2040: The National Development Plan 2021-2030

The National Development Plan (NDP) sets out the investment priorities that will underpin the successful implementation of the NPF. This will guide national, regional, and local planning and investment decisions in Ireland over the next two decades to cater for an expected population increase of over 1 million people.

Resolving the systemic factors underlying the current housing crisis is at the heart of the NDP and reflecting this, housing and sustainable urban development is a priority for the National Development Plan. In this regard, the NDP states that there is a “need to provide in excess of half-a-million more homes over the period to 2040 corresponds to a long-term trend of 25,000 new homes every year. A higher level of output is needed in the short to medium-term to respond to the existing deficit that has given rise to the housing crisis.’

Furthermore, the NDP states that “the continuation of existing patterns of development accentuates the serious risk of economic, social, and environmental unsustainability through, for examples, placing more distance between where people work and where people live, and increasing energy demand. The NPF highlights the urgent requirement for a major uplift of the delivery of housing within the existing built-up areas of cities and other urban areas. It has a particular focus on brownfield development, targeting derelict and vacant sites that may have been developed before but have fallen into disuse.”

There are a number of strategic outcomes identified within the NDP which support the proposed development at the subject site. Such outcomes include:

National Strategic Outcome 1: Compact Growth – *“This outcome aims to secure the sustainable growth of more compact urban and rural settlements supported by jobs, houses, services, and amenities, rather than continued sprawl and unplanned, uneconomic growth. This requires streamlined and co-ordinated investment in urban, rural, and regional infrastructure by public authorities to realise the potential of infill development areas within our cities, towns, and villages. This will give scope for greater densities that are centrally located and, in many cases, publicly owned, as well as bringing life and economic activity back into our communities and existing settlements. Creating critical mass and scale in urban areas with enabling infrastructure, in particular increased investment in public and sustainable transport and supporting amenities, can act as crucial growth drivers. This can play a crucial role in creating more attractive places for people to live and work in, facilitating economic growth and employment creation by increasing Ireland’s attractiveness to foreign investment and strengthening opportunities for indigenous enterprise”.*

National Strategic Outcome 4: Sustainable Mobility – *“The expansion of attractive and sustainable public transport alternatives to private based car transport will reduce congestion and emissions and enable the transport sector to cater in an environmentally sustainable way for the demands associated with longer term population and employment growth envisaged under the NPF. Furthermore, the provision of safe alternative active travel options such as segregated cycling and walking facilities can also help alleviate congestion and meet climate action objectives by providing viable alternatives and connectivity with existing public transport infrastructure”.*

The proposed Large-Scale Residential Development (LRD) at Forest Road, Swords, Co. Dublin, comprising 109 no. residential units in a mix of apartments, duplexes, and houses, supports the delivery of key objectives set out in the National Development Plan (NDP) and the National Planning Framework (NPF), which together guide Ireland’s national planning and investment decisions to 2040 and beyond.

The NDP identifies housing delivery and sustainable urban development as central priorities, underpinned by a recognition of the need to deliver in excess of 500,000 new homes nationally to address both existing housing deficits and future population growth. This requires a sustained increase in housing output, particularly in urban areas, and a fundamental shift away from unsustainable development patterns that have historically contributed to sprawl, congestion, and inefficient land use.

Supporting Compact Growth (National Strategic Outcome 1)

The subject site is located within the settlement boundary of Swords, a designated Key Town within the Eastern and Midland Regional Spatial and Economic Strategy (RSES) and Fingal County’s long-term strategy to grow Swords as a significant urban centre. The proposed development represents an efficient and sustainable use of serviced, well-connected urban land, contributing directly to the delivery of compact growth as sought under National Strategic Outcome 1.

The development proposes a diversified housing mix within a compact footprint, achieving a density and built form (2 to 5 storeys) that is appropriate to the urban context of Swords. The layout supports the creation of a walkable neighbourhood, supported by high-quality public realm enhancements, landscaping, and improved permeability, with connections to Forest Road and nearby amenities.

By delivering a critical mass of new housing within an established urban area, the proposal strengthens the social and economic fabric of Swords, activates underutilised land, and supports the viability of existing services, infrastructure, and community facilities. This aligns with national policy aims to focus investment and growth in existing settlements, rather than at their edges or in car-dependent, low-density patterns.

Enabling Sustainable Mobility (National Strategic Outcome 4)

The proposed development is well-served by existing and planned public transport infrastructure, including numerous Dublin Bus services (routes 102, 41B, 41C, 505 series), and is located approximately 1.5km from the future Fosterstown Metrolink Station, with additional connectivity planned via the BusConnects L81 route.

The layout incorporates active travel infrastructure, including a new footpath and cycle path to Forest Road, along with safe pedestrian and cycle access throughout the scheme. This supports the NDP's objectives to promote modal shift from private cars to more sustainable forms of transport, reduce emissions, and enhance the liveability of urban environments.

Furthermore, the site's proximity to local services including a supermarket, medical facilities, schools, retail centres, and recreational amenities, all within walking or cycling distance further reduces reliance on private car travel, consistent with climate action and public health goals.

In light of the above, the proposed development is demonstrably aligned with the investment priorities and policy objectives of the National Development Plan (NDP) and the National Planning Framework (NPF). It supports compact, sustainable urban growth in a designated Key Town, contributes meaningfully to addressing the national housing need, and promotes a shift towards active and sustainable travel.

The proposal represents a considered and appropriate response to national, regional, and local policy frameworks and will help facilitate the long-term development vision for Swords as a compact, connected, and vibrant urban centre.

1.3 Housing for All – a New Housing Plan for Ireland 2021

The Housing for All: A New Housing Plan for Ireland states that Ireland's housing system is not meeting the needs of enough of our people, and therefore, it needs to increase new housing supply to an average of at least 33,000 new units per year over the next decade. This will include over 10,000 social homes each year over the next five years, with 9,500 of these being new-builds, and an average of 6,000 affordable homes for purchase or rent. As per, Housing for All provides four pathways to achieving four overarching objectives:

- Supporting Homeownership and Increasing Affordability;
- Eradicating Homelessness, Increasing Social Housing Delivery and Supporting Social Inclusion;

- Increasing New Housing Supply; and
- Addressing Vacancy and Efficient Use of Existing Stock.

Outlined in the Plan, the State must act decisively to increase supply of both private and public housing. An average of 33,000 homes must be provided every year between now and 2030. Increased housing output is needed in all sectors - private, affordable, and social - to meet the needs of people in a wide variety of circumstances.

The proposed Large-Scale Residential Development (LRD) on lands at Forest Road, Swords, comprising a total of 109 residential units (including apartments, duplexes, and houses) directly supports the Government's objectives as set out in Housing for All: A New Housing Plan for Ireland (2021), which seeks to transform Ireland's housing system and increase supply across all tenures.

Housing for All identifies that the housing system is not meeting the needs of enough people and sets out an ambitious programme to increase supply to an average of at least 33,000 new homes per year until 2030. This includes the delivery of social, affordable, and private housing, with a clear commitment to ensuring that supply meets the diverse needs of Ireland's growing population.

Increasing New Housing Supply

The proposed development contributes directly to Pathway 3: Increasing New Housing Supply, delivering a mixed-tenure, high-quality residential scheme within a designated growth settlement. The scheme's provision of 109 units, in a range of house types and sizes, is in line with the strategic objective to significantly increase housing output across all sectors.

The development includes:

- 41 no. apartments (including 1- and 2-bedroom units),
- 42 no. duplex units (1- and 3-bedroom units),
- 26 no. houses (2-, 3-, and 4-bedroom units).

This variety in unit types caters to a broad demographic, including individuals, couples, families, and downsizers, helping to meet current housing demand in a sustainable and balanced manner.

Supporting Homeownership and Affordability

By providing a mix of house types and unit sizes at varying price points, the development supports Pathway 1: Supporting Homeownership and Increasing Affordability. The scheme creates opportunities for entry-level buyers and families to access high-quality homes within an established, well-connected urban area, aligning with Housing for All's goal of making homeownership achievable for more people.

Supporting Social Inclusion and Housing Diversity

The development layout, design, and unit mix have been planned to foster social cohesion and ensure an inclusive community environment, consistent with Pathway 2: Eradicating Homelessness,

Increasing Social Housing Delivery and Supporting Social Inclusion. While tenure specifics will be addressed through agreements with the local authority (e.g., Part V provision), the proposal supports social integration through a tenure-blind design approach and high-quality public realm.

Efficient Use of Zoned Land and Addressing Vacancy

Aligned with **Pathway 4: Addressing Vacancy and Efficient Use of Existing Stock**, the subject site represents an efficient and sustainable use of serviced, zoned residential land within the Swords settlement boundary. The site is strategically located with access to public transport, local services, and infrastructure, thereby reducing development pressure on greenfield and peripheral lands. The proposal supports densification within an existing urban area, reinforcing compact growth principles and addressing inefficient development patterns.

In summary, the proposed development is fully aligned with the vision and objectives of *Housing for All*. It represents a meaningful contribution to national and local housing delivery targets by:

- Increasing housing supply in a sustainable and appropriate location;
- Delivering a diverse housing mix that supports affordability and inclusion;
- Making efficient use of zoned, serviced urban land;
- Supporting compact growth and integration with transport and amenities.

The proposal reflects a responsible, policy-led approach to housing delivery, contributing positively to resolving systemic challenges within the housing sector while creating a vibrant and liveable new community in Swords.

1.4. Housing for All; Plan (Updated 2024)

There were 1,318 homes commenced in November 2024. For the first eleven months of 2024 (January – November), 54,574 were homes commenced, a significant increase of 84% compared to 29,634 homes in the same period of 2023. This equates to an average of 235 homes commenced every working day to the end of November.

Of the 1,318 homes commenced in November 2024, 48% are scheme dwellings, 19% are apartments and 33% are for one-off units. It is noted though that construction levels have begun to decrease at a time of increasing demand. This will only add to the pent-up demand and shortage of housing.

In this context and considering our client's (the applicant's) track record, it is submitted that the proposed development of 109 no. residential units will play a significant role in completing the appropriately zoned lands at Forest Road, Swords. This development will also contribute to meeting the broader housing targets within the County driven by the national level policy.

1.5. Affordable Housing Act 2021 & Housing Circular 28/2021

Part 6 of the Affordable Housing Act 2021, which was enacted on 21 July 2021, gives effect to this commitment. The principal change to Part V made by these amendments is to increase the Part V

contribution for new housing developments from 10% social housing to a mandatory 20% requirement, at least half of which must be applied to social housing provision and up to half of which may be applied to affordable and cost rental housing. It is noted that these changes to Part V primarily apply to land purchased on or after 1 August 2021.

It is considered that the proposed development is consistent with the Affordable Housing Act 2021, Housing Circular 28/2021, and the requirements under Part V of the Act as it is proposed to provide 20% of the housing units for social and affordable housing. For further details, please refer to the enclosed Part V Validation Letter from Fingal County Council with associated Part V layout drawing.

1.6 The Housing Agency Statement of Strategy 2025-2029

The Housing Agency's **Statement of Strategy 2025–2029** sets out our renewed commitment to supporting a housing system that is responsive, inclusive, and future-focused. Over the next five years, the Agency will continue to serve as a key implementation partner in delivering the objectives of **Housing for All** and other national housing strategies.

Building on the foundation of our previous strategic plan, our work will be guided by three interlinked themes:

Theme 1: Being a Centre for Housing Knowledge

- Inform national housing policy and decision-making.
- Monitor and report on key trends across tenure, affordability, supply, and demand.
- Support better forecasting of housing needs at national and local levels.
- Lead research on demographic trends, climate-resilient housing, and inclusive design

Theme 2: Addressing Housing Supply and Affordability

- Supporting the scaling of social, affordable, and cost-rental housing.
- Facilitating land activation and use of public landbanks.
- Promoting vacancy and dereliction solutions, particularly in towns and city cores.
- Enabling delivery through funding, advice, procurement, and design guidance.

Theme 3: Supporting the Creation of Sustainable and Inclusive Communities

- Providing training and professional development for housing practitioners.
- Enhancing governance, leadership, and financial skills in AHBs and local authorities.
- Promoting collaboration across government, community, and private sectors.
- Fostering innovation in procurement, design, and delivery models.

The 2025–2029 is informed by key national priorities and trends in the housing system, including:

- **Ireland's diverse and evolving housing needs**, shaped by an ageing population, migration, urbanisation, and changing household compositions.

- **Sustainability and climate resilience**, ensuring that new and existing housing stock contributes to environmental goals and supports liveable communities.
- **Digital transformation**, both in how homes are delivered and in how housing services are accessed and managed.
- **Affordability and inclusion**, ensuring that vulnerable groups—including older people, people with disabilities, and those at risk of homelessness—have access to secure, appropriate housing.

The proposed Large-Scale Residential Development (LRD) at Forest Road, Swords, Co. Dublin, comprising a total of 109 residential units—26 houses, 42 duplex units, and 41 apartments—has been carefully designed to align with the priorities set out in the **Housing Agency’s Statement of Strategy 2025–2029**.

Under the theme of *Being a Centre for Housing Knowledge*, the proposed development reflects an evidence-based approach to addressing housing need. The proposed housing mix caters to a diverse demographic, including one-, two-, three-, and four-bedroom units, and is designed to meet the evolving needs of individuals, families, and older persons. The location in Swords, a Key Town in the Eastern and Midland Region is highly accessible, with strong transport links and community services, making it a strategically appropriate site for compact and sustainable residential development. The development supports inclusive design and responds to forecasted demographic and urbanisation trends identified in national policy.

In relation to *Addressing Housing Supply and Affordability*, the proposal activates zoned residential land within a built-up area targeted for growth under the Fingal County Development Plan 2023–2029. It will contribute directly to national housing supply targets and the objectives of *Housing for All*.

The proposed development also strongly supports the theme of *Supporting the Creation of Sustainable and Inclusive Communities*. The site layout promotes active travel through dedicated pedestrian and cycle connections to Forest Road, integrates public realm and green space enhancements, and incorporates a mix of dwelling types to foster social inclusion. The scheme is designed to be climate-resilient and energy efficient, contributing to broader environmental and sustainability objectives. Importantly, the development embraces principles of good urban design and placemaking, which are essential for long-term community integration and well-being.

In conclusion, the proposed development is fully aligned with the Housing Agency’s Strategy 2025–2029 and responds positively to Ireland’s national housing priorities. It contributes to the delivery of new homes across multiple tenures, supports the creation of an inclusive and resilient neighbourhood, and demonstrates compliance with current legislation and policy on affordable and social housing provision. It represents a sustainable and well-considered response to both current and future housing needs in Swords and the wider Fingal area.

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

The main objective of the guidelines is to provide 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. They build on and update previous guidance to take account of current Government policy and economic, social, and environmental considerations.

There is a renewed focus in the Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality urban design and placemaking to support sustainable and compact growth.

The aim of the Guidelines is to set out the key planning principles which should be reflected in development plans and local area plans, and which should guide the preparation and assessment of planning applications for residential developments in urban areas. These Guidelines support higher residential densities particularly for sites within town centre locations and along public transport corridors, as it states: *“To achieve compact growth, it will also be necessary to increase the scale of new buildings in all parts of our cities and towns, with highest densities at the most central and accessible urban locations, particularly in city centres and close to public transport nodes and interchanges.”*

Swords is identified as a Metropolitan Area / Key Town under the settlement type within the Fingal Development Plan 2023-2029. The Guidelines highlight appropriate densities for specific locations.

Table 2.14: Core Strategy of the Fingal Development Plan 2023-2029 notes the 2016 census population of Swords at approximately 47,120 with an estimated population as of 2029 predicted at approximately 60,265.

Table 2.14: Core Strategy – 2023-2029 Fingal Development Plan

Core Strategy Areas	Settlement Type	Name	CSO Census Population 2016	Estimated 2023 Population	Estimated 2029 Growth	Estimated 2029 Population	Projected Housing Demand (Units)	Total Available Zoned Residential Land	Total Units / Potential Yields	Land - With Permission (Extant) - Units
Metropolitan Area	(1) Dublin City and Suburbs Consolidation Area	Blanchardstown – Mulhuddart LEA, includes The Ward, Dubbar, Tyrellstown, Mulhuddart, Corduff & Abbottstown	34,420	39,583	3,258	42,841	1,761	90	4,495	917
		Ongar LEA – includes Blakesown, Coolmine	50,214	57,746	1,803	59,549	975	33	1,659	785
		Castleknock LEA, includes Roselawn, Delwood, Castleknock Park, Knockmaroon & Lucan North	32,633	37,528	3,005	40,533	1,625	52	2,623	509
		Santry and Ballymun	2,485	2,684	925	3,609	500	12	600	358
		Belcamp and Ratgriffin	6,702	7,238	912	8,150	493	36	1,791	-
		Baldryle / Sutton	13,402	14,474	925	15,399	500	34	1,709	1,386
		Howth	8,294	8,875	925	9,800	500	20	1,006	710
		(2) Key Town – Swords	47,120	54,188	6,077	60,265	3,285	122	6,110	2,468
(3) Self Sustaining Growth Town		Donabate	7,443	8,187	3,039	11,226	1,643	112	3,912	532

Figure 12: Extract from the Fingal Development Plan 2023-2029

Given the NPF priorities for compact growth and reflecting the variety of settlements and settlement contexts where residential development takes place, 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.

According to Table 3.1 of the Guidelines, the subject site falls within **City – Suburban/Urban Extension of Dublin Metropolitan Area (MASP)**, and thus, it can potentially accommodate a density of 40-80dph with densities of up to 150dph open for consideration at “accessible” suburban/urban extension locations.

Table 3.1 - Areas and Density Ranges Dublin and Cork City and Suburbs

City - Centre

The city centres of Dublin and Cork, comprising the city core and immediately surrounding neighbourhoods⁶, are the most central and accessible urban locations nationally with the greatest intensity of land uses, including higher order employment, recreation, cultural, education, commercial and retail uses. It is a policy and objective of these Guidelines that residential densities in the range 100 dph to 300 dph (net) shall generally be applied in the centres of Dublin and Cork.

City - Urban Neighbourhoods

The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations⁷, (iii) town centres designated in a statutory development plan, and (iv) lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area. These are highly accessible urban locations with good access to employment, education and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.

City - Suburban/Urban Extension

Suburban areas are the lower density car-orientated residential suburbs constructed at the edge of cities in the latter half of the 20th and early 21st century, while urban extension refers to the greenfield lands at the edge of the existing built up footprint that are zoned for residential or mixed-use (including residential) development⁸. It is a policy and objective of these Guidelines that residential densities in the range 40 dph to 80 dph (net) shall generally be applied at suburban and urban extension locations in Dublin and Cork, and that densities of up to 150 dph (net) shall be open for consideration at ‘accessible’ suburban / urban extension locations (as defined in Table 3.8).

Figure 13: Extract from the Compact Settlement Guidelines (2024)

The Compact Settlements Guidelines (section 3.4.2) emphasise the importance of a context-based approach when considering higher density development setting out that *“the evaluation of impact on local character should focus on the defining characteristics of an area, including for example, the prevailing scale and mass of buildings, urban grain and architectural language, any particular sensitivities, and the capacity of the area for change. While it is not necessary to replicate the scale and mass of existing buildings, as most urban areas have significant capacity to accommodate change, it will be necessary to respond in a positive and proportionate way to the receiving context through site responsive design”*.

The area immediately to the north of the subject site, Ridgewood, can be characterised as being predominantly two storey houses with several, three storey apartment blocks developed located along Forest Road.

In regard to the proposed development, as noted 109 residential units are proposed. Thus, the site density is noted as follows: 51dph (net). Therefore, the proposed density would appear in line with that of the guidance of the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024).

The Guidelines also sets out 4 no. SPPR’s to assist in the delivery of new development.

“SPPR 1 – Separation Distances:

It is a specific planning policy requirement of these Guidelines that statutory development plans¹⁵ shall not include an objective in respect of minimum separation distances that exceed

16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.

There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail."

It is submitted that the proposed development through proposed built form and siting has met with and exceeds the requirements of SPPR 1 in regard to sufficient separation distances, with further details provided in the architectural pack prepared by Crawford Architecture and submitted under separate cover.

"SPPR 2 – Minimum Private Open Space Standards for Houses:

It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:

- 1 bed house 20 sq.m
- 2 bed house 30 sq.m
- 3 bed house 40 sq.m
- 4 bed + house 50 sq.m

A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1 below). The planning authority should be satisfied that the compensatory semi-private open space will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves.

Apartments and duplex units shall be required to meet the private and semi-private open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).

For building refurbishment schemes on sites of any size or urban infill schemes on smaller sites (e.g. sites of up to 0.25ha) the private open space standard may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and proximity to public open space.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.”

In regard to apartments and duplex units, these are noted to be required to meet private and semiprivate open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).

Public Space is also noted of import, for which refers to open spaces that form part of the public realm within a residential development. All residential developments are required to make provision for a reasonable quantum of public open space, with a need to focus on overall quality, amenity value and biodiversity value of said public open spaces. Notably, these spaces should integrate and protect natural features of significance and green and blue infrastructure corridors within the site and should support the conservation, restoration and enhancement of biodiversity. The public open spaces should also form an integral part of the design and layout of a development and provide a connected hierarchy of spaces, with suitable landscape features, including seating and provision for children’s play.

It is submitted that the proposed development has met with and exceeds the requirements of SPPR 2 in regard to all proposed units availing of suitable private open and communal spaces, with further details provided in the architectural pack including the HQA prepared by Crawford Architects, submitted under separate cover.

“SPPR 3 – Car Parking:

It is a specific planning policy requirement of these Guidelines that:

- (i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling.*
- (ii) In accessible locations, defined in Chapter 3 (Table 3.8) car- parking provision should be substantially reduced. The maximum rate of car parking provision for residential*

development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.

- (iii) In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling. Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.”

In terms of table 3:8 Accessibility:

Table 3.8: Accessibility

<p>High Capacity Public Transport Node or Interchange</p> <ul style="list-style-type: none"> • Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail¹¹, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor'¹² stop. • Highest densities should be applied at the node or interchange and decrease with distance. • 'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.
<p>Accessible Location</p> <ul style="list-style-type: none"> • Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.

Figure 14: Extract from the Compact Settlement Guidelines (2024)

It is evident that the subject site can be described as being within proximity of high-capacity transport nodes/ interchanges, being exceptionally well-connected, benefiting from easy access to key transport routes. Notably several bus routes within 800m of the subject site, (102, 41B, 41C, 505, 505X, 500X, 503, and 507) provide frequent services to key destinations, including Dublin City Centre and Swords Main Street. Additionally, the planned Fosterstown Metrolink Station, 1.5 km away, will provide fast rail connections to Dublin, while the upcoming Dublin BusConnects initiative will introduce several new routes, including the L81 Sutton-Dublin Airport Local Bus Route, further improving the site's connectivity.

It is submitted that the proposed development has met with and exceeds the requirements of SPPR 3. Accordingly, the proposed development provides an overall total of 96 no. car parking spaces. The

level of parking is just below the maximum requirement that would be set by the Guidelines. A detailed rationale and justification for this provision are outlined in the Traffic and Transport Assessment by Barrett Mahony Consulting Engineers (BMCE) and submitted under separate cover.

“SPPR 4 – Cycle Parking & Storage:

It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors.

The following requirements for cycle parking and storage are recommended:

- (i) Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/ enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.*
- (ii) Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.”*

It is submitted that the proposed development has met with and exceeds the requirements of SPPR 4. The proposed development seeks to provide an overall total of 265 no. bicycle parking spaces throughout the site. Further details are provided in the Traffic and Transport Assessment by Barrett Mahony Consulting Engineers (BMCE) and submitted under separate cover.

As set out above, it is respectfully submitted that the proposed development complies with each of the SPPR’s set out in the Compact Settlement Guidelines.

Furthermore, as outlined in **Policy & Objectives 5.1** of the Compact Settlement Guidelines:

“It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances.

Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing

public open space provision in the area and broader nature conservation and environmental considerations.

In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area.

In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas."

The proposed development includes a total of 2,673sq.m. of public open space, distributed across 2 key areas throughout zoned part of the site. This represents 12% of the developable site area, exceeding the requirements set out in both the Development Plan and the Compact Settlements Guidelines. This excludes the large Class 1 public park that will be located on the Greenbelt zoned part of the site to the south of the access road.

From a qualitative standpoint, the proposed public open spaces have been strategically sited and designed so to integrate with one another through pedestrian paths, creating an active network of green spaces. This design not only enhances the connectivity within the development but also allows for the development to tie in with that of the surrounding area.

This approach toward the subject site's green spaces, significantly contributes to and promotes green infrastructure, reinforcing the broader environmental and community objectives of Swords.

With respect to the above, DOWNEY are of the considered opinion that the proposed development represents a development that has been carefully considered and appropriately designed through a collaborative process with the Council and giving full considerations to relevant planning policy while being mindful of its wider context. For further details on the proposed development's consistency with the Criteria Assessment, please refer to the Architects Plans, Design Statement and HQA prepared by Crawford Architecture and submitted under separate cover of the application.

1.8 Design Manual for Quality Housing 2022

The Design Manual for Quality Housing (2022), developed by the Department of Housing, Local Government and Heritage, provides comprehensive guidelines aimed at improving the quality, efficiency, and sustainability of housing projects within Ireland.

Its primary objective is to standardise housing design across local authorities and Approved Housing Bodies (AHBs), facilitating faster and more cost-effective delivery of social housing.

The manual emphasises key areas such as high design standards, sustainability, and universal design, ensuring homes are accessible and adaptable to all residents, including those with disabilities. It includes standardised site layouts and internal designs for houses, duplexes, and apartments, which help streamline approval processes. The manual also incorporates guidance on sustainable building practices and energy efficiency, aligning housing developments with national environmental goals. By

providing actionable design solutions, it supports the practical implementation of housing policies and enhances the overall delivery of quality social housing.

The proposed development aligns with the objectives of the *Design Manual for Quality Housing (2022)* by incorporating high design standards, promoting sustainability, and ensuring accessibility. The development includes a range of housing typologies, from duplexes and apartments to family-oriented houses, which cater to diverse demographic needs. The provision of private open spaces, balconies, and terraces ensures high-quality living environments, while the incorporation of surface car parking, bicycle parking, and wheelchair spaces supports sustainable mobility. The design also prioritizes connectivity through new footpaths and cycle paths, enhancing accessibility and promoting active transport. Additionally, the layout and integration of landscaping, boundary treatments, and public lighting reflect a commitment to creating a well-designed, sustainable, and inclusive community, in line with the principles outlined in the Manual.

DOWNEY respectfully request the Planning Authority to refer to the Architects Plans, Design Statement and HQA prepared by Crawford Architects and submitted under separate cover of the application.

1.9 Urban Development and Building Height Guidelines for Planning Authorities 2018

The Urban Development and Building Height Guidelines set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives as set out in the National Planning Framework and Project Ireland 2040. This document recognises that in recent years local authorities, through the statutory plan processes, have begun to set generic maximum height limits. However, such limits if inflexibly and unreasonably applied, can undermine national policy objectives to provide more compact urban forms as outlined in the National Planning Framework and instead can continue unsustainable patterns of development.

These Guidelines reinforce that *“a key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and 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”*.

The document states that it is critically important that development plans identify and provide policy support for specific geographic locations or precincts where increased building height is not only desirable but a fundamental policy requirement. Locations with the potential for comprehensive urban development or redevelopment should be identified were, for example, a cluster of higher buildings can be accommodated as a new neighbourhood or urban district or precinct.

Section 1.10 of the Guidelines state “the rationale (...) for consolidation and densification in meeting our accommodation needs into the future must also be applied in relation to locations that development plans and local area plans would regard as city and town centre areas”. It continues, “in such areas, it would be appropriate to support the consideration of building heights of at least 6 storeys at street level as the default objective, subject to keeping open the scope to consider even greater building heights by the application of the objectives and criteria laid out in Sections 2 and 3 of these guidelines, for example on suitably configured sites, where there are particular concentrations of enabling infrastructure to cater for such development, e.g. very significant public transport capacity

and connectivity, and the architectural, urban design and public realm outcomes would be of very high quality”.

Section 1.11 states “these guidelines therefore set out national planning policy that:

- *Expand on the requirements of the National Planning Framework; and*
- *Applies those requirements in setting out relevant planning criteria for considering increased building height in various locations but principally (a) urban and city-centre locations and (b) suburban and wider town locations”*

The Guidelines go on to state that “*in relation to the assessment of individual planning applications and appeal, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility.*”

The following Specific Planning Policy Requirements are contained within the Guidelines and are relevant to the proposed development:

SPPR 1 – *“In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height”.*

The proposed development complies with *Urban Development and Building Height Guidelines 2020*, specifically SPPR 1, by embracing the policy of increasing building height and density in locations with excellent public transport accessibility. The development is situated within a highly accessible area, benefiting from multiple Dublin Bus services (routes 102, 41B, 41C, 505 series) and being approximately 1.5 km from the future Fosterstown Metrolink Station, with further connectivity improvements planned through the BusConnects L81 route. This strategic location supports higher building densities, in line with national and regional objectives.

Notwithstanding, the proposed development thoughtfully responds to the existing built form and context of the surrounding area. The 4 and 5-storey apartment blocks along Forest Road contribute positively to the urban streetscape, enhancing the existing urban framing and complementing the established three-storey structures along Forest Road. With the proposed height and massing of the two proposed apartment blocks designed with a staggered approach to minimise visual impact and ensure a sympathetic transition to the existing building heights along Forest Road. With the remainder of the proposed units at two and three storey structures resembling that of the predominant built form of this area of Swords.

The proposed siting and design effectively allow for integration of the proposed development into the surrounding urban fabric, enhancing the streetscape while respecting the character of nearby buildings. Further, the proposal ensures that increased building height supports urban regeneration and infill development, in line with Government policy to promote sustainable urban growth in areas with strong public transport links.

SPPR 2 – *“In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office, commercial, appropriate retail provision, and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social, and community infrastructure, including leisure facilities”.*

The proposed development offers a wide range of residential units from 1, 2, 3 and 4 beds, to houses, apartments and duplexes. Additionally, the development is strategically located to capitalize on the commercial and employment opportunities available in the surrounding area. A Community and Social Infrastructure Audit, prepared by DOWNEY, is included with this LRD application for the Planning Authority's consideration. This audit demonstrates the suitability of the development in relation to the existing amenities and facilities, ensuring that future residents will have access to essential services, thereby supporting the sustainable growth and development of the area.

SPPR 3 – *“It is a specific planning policy requirement that where;*

(A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and

2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.

(B) In the case of an adopted planning scheme the Development Agency in conjunction with the relevant planning authority (where different) shall, upon the coming into force of these guidelines, undertake a review of the planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate urban locations shall be articulated in any amendment(s) to the planning scheme.

(C) In respect of planning schemes approved after the coming into force of these guidelines these are not required to be reviewed.”

It is respectfully submitted that the following document that of this Planning Statement/Statement of Consistency, outlines how the proposal is consistent with the relevant national, regional, and local planning policy as it pertains to the site and its environs, and as such the development accords with SPPR 3.

Further, DOWNEY contends that this Large-Scale Residential Development (LRD) application aligns with the Development Management Criteria outlined in the Urban Development and Building Height Guidelines (2020), specifically Section 3.2. These criteria are designed to ensure that proposals for increased building height are appropriate and well-integrated into their surroundings.

1. At the scale of the relevant city/town

- The site is within the development boundary of Swords and is served by various public bus routes.
- This development has been carefully modulated to respect the character of the area and residential amenity of neighbouring properties. It successfully integrates and enhances the public realm of the locality having regard to the surrounding area and existing residential developments. All such considerations have been made during the design process which has involved a multi-disciplinary team, which includes Ecologists, Architects, Landscape Architects, Engineers, Archaeologists, etc.
- A positive contribution has been made towards achieving densities within this locality and is in turn reflective of the area, with the proposed unit mix providing for a good choice of unit types and sizes for future residents and this in turn caters for a broad range of housing requirements within the housing market, namely first-time buyers, singles, downsizers, and retirees.

2. At the scale of district/neighbourhood/street

- The proposed heights will help to create and add visual interest in this area, while protecting views in the wider area.
- It is respectfully considered that the proposal introduces a high-quality development at an appropriately zoned site. The proposed development responds appropriately to the massing and scale of the residential pattern and scale in the town of Swords proper and that of the immediate area, helping to create a strong sense of place through the introduction of suitable urban form, coupled with high quality green and public areas.
- Suitable daylight provision for that of the proposed building has been met. The Planning Authority is respectfully directed to review that of the provided Daylight and Sunlight Assessment prepared by 3D Design Bureau and provided under separate cover with this application.

3. At the scale of the site/building

- A Design Statement, prepared by Crawford Architecture and submitted under separate cover with this application provides for and elaborates upon the form, massing, scale and overall proposed heights of the development structures, illustrating how the development carefully considers and provides for suitable daylight, ventilation and views while ensuring minimisation of shadowing and unreasonable amenity impacts.
- The design of the houses, duplexes, and apartments are bespoke for this site in terms of the palette of materials and provision of public and communal open space to create an attractive public.

It is submitted that this LRD application contains sufficient reports, documentation, plans, and justification to support the proposed development and outlines how the development is in accordance with the relevant planning policies and guidelines pertaining to the area. Such documents include architectural plans and elevations, Design Statement (Architects Report), DMURS statements, Traffic Assessment, EIAR Screening Report, planning reports, and engineering reports, which we invite the Planning Authority to review.

SPPR 4 – *“It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:*

- 1. The minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act, 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;*
- 2. A greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. Avoid mono-type building typologies (e.g., two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more”.*

The proposed development aims to deliver 109 no. residential units, consisting of 26 houses, 42 duplex units, and 41 apartments. This results in a net density of 51dph, which aligns with both local and national planning policies. Additionally, there is an appropriate mix of housing typologies and heights ranging from 2-storey houses, 3-storey duplex apartments to 5-storey apartment units. The development is therefore submitted to be in accordance with SPPR 4 of these Guidelines and keep consistent with the aforementioned guidelines.

DOWNEY therefore considers that the proposed development is consistent with the requirements of these guidelines on building heights for urban developments.

1.10 Sustainable Urban Housing: Design Standards for New Apartments 2023

The Sustainable Urban Housing: Design Standards for New Apartments build on the content of the 2015 and 2020 apartment guidance, much of which remains valid, particularly with regard to design quality safeguards such as internal space standards for apartments, internal storage and amenity space. The Guidelines state that *“in the longer term to 2040, the Housing Agency has identified a need for at least 45,000 new homes in Ireland’s five cities (Dublin, Cork, Limerick, Galway and Waterford), more than 30,000 of which are required in Dublin City and suburbs, which does not include additional pent-up demand arising from under-supply of new housing in recent years.”* It is also stated that it is *“critical to ensure that apartment living is an increasingly attractive and desirable housing option for a range of household types and tenures.”*

The Guidelines also state that *“aspects of previous apartment guidance have been amended and new areas addressed in order to:*

- enable a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas;*
- make better provision for building refurbishment and small-scale urban infill schemes;*
- address the emerging ‘build to rent’ and ‘shared accommodation’ sectors; and*
- remove requirements for car-parking in certain circumstances where there are better mobility solutions and to reduce cost.”*

The Guidelines state that Ireland is a long way behind European averages in terms of the numbers of households living in apartments, especially in our cities and larger towns. Given the gap between Irish

and European averages in numbers of households living in apartments and the importance of addressing the challenges of meeting the housing needs of a growing population in our key cities and towns and by building inwards and upwards rather than outwards, apartments need to become the norm for urban housing solutions.

The Guidelines state that, *“ongoing demographic and societal changes mean that in addition to families with children, the expanding categories of household that may wish to be accommodated in apartments include:*

- Young professionals and workers generally;
- Those families with no children;
- ‘Downsizers’; and
- Older people, in both independent and assisted living settings.”

The Guidelines identify types of locations that may be suitable for apartment developments. In this regard, it is considered that the proposed development falls within “(1) Central and/or Accessible Urban Locations” as it meets the criteria in that the subject site is located within 800m of several urban bus services, with the following bus services in close proximity: (102, 41B, 41C, 505, 505X, 500X, 503, and 507) for which frequent services to key destinations, including Dublin City Centre and Swords Main Street. Additionally, the planned Fosterstown Metrolink Station, 1.5 km away, will provide fast rail connections to Dublin, while the upcoming Dublin BusConnects initiative will introduce several new routes, including the L81 Sutton-Dublin Airport Local Bus Route, further improving the site's connectivity.

The Guidelines also have specific planning policy requirements (SPPRs) which include the following:

SPPR 1 – *“Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).”*

SPPR 3 – *Minimum apartment floor areas:*

*Studio Apartment (1-person) 37sqm
1-bedroom apartment (2 persons) 45sqm
2-bedroom apartment (4-persons) 73sqm
3-bedroom apartment (5-persons) 90sqm”*

In this regard, the proposed development provides for 109 no. residential units (26 no. house, 42 no. duplex units, and 41 no. apartments) within the following unit mix. As can be seen in the Table below, the overall unit mix stands at a total of 35% 1 bed units (apartments and duplex units) 26% two-bed, 28% three-bed, 11% four-bed residential units in a mix of houses, apartments and duplex units. As such, it is submitted that the proposed development complies with the SPPR 1 of the Design Standards.

Apartment Mix		
Unit Type	No.	%
1 bed apartment	18	44%
2 bed apartment	23	56%
Total	41	100%
Duplex Mix		
Unit Type	No.	%
1 bed duplex	21	50%
3 bed duplex	21	50%
Total	42	100%
Housing Mix		
Unit Type	No.	%
2 bed houses	5	19.2%
3 bed houses	10	38.5
4 bed houses	11	42.3%
Total	26	100%

This LRD application also includes a Housing Quality Assessment prepared by Crawford Architecture and enclosed with the architectural pack which demonstrates how the proposed development complies with the SPPR 3 of the Design Standards. The Planning Authority are invited to refer to this submitted under separate cover of this LRD application.

SPPR 4 – “In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

- (i) A minimum of 33% dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject characteristics and ensure good street frontage where appropriate.
- (ii) In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.
- (iii) For building refurbishment schemes, on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.”

The proposed development in this instance is located in a suburban location on appropriately zoned lands in a highly accessible location within the development boundary of Swords. In this regard, the minimum requirement for dual aspect units is 50%. The proposed development exceeds this greatly.

In terms of Children’s Play areas, the proposed development has considered the recreational needs of children and incorporates children play equipment as part of the communal amenity space within the scheme.

The guidelines in this regard state:

“Children’s play needs around the apartment building should be catered for:

- within the private open space associated with individual apartments;
- *within small play spaces (about 85-100 sqm) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/ guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and,*
- *within play areas (200-400 sqm) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms.”*

DOWNEY submit that the proposed development is consistent with the Guidelines in this instance. Please refer to the enclosed landscape drawings prepared by RMDA Landscape Architects for further information in this regard.

SPPR 5 – *“In relation to floor to ceiling heights, the following shall apply:*

- *Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality.”*

DOWNEY submit that the proposed development is consistent with the Guidelines in this instance. Please refer to the enclosed planning drawings pack prepared by Crawford Architecture for further information.

SPPR 6 – *“In relation to maximum number of apartments and core requirements, the following shall apply:*

- *A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, subject to overall design quality and compliance with building regulations.”*

DOWNEY submit that the proposed development is consistent with the Guidelines in this instance. Please refer to the enclosed planning drawings pack prepared by Crawford Architecture for further information.

In relation to bicycle and car parking requirements, the Guidelines state that it must be ensured that, *“new development proposals in central urban and public transport accessible locations and which otherwise feature appropriate reductions in car parking provision are at the same time comprehensively equipped with high quality cycle parking and storage facilities for residents and visitors”*. The proposed development subject to this LRD, provisions for an overall total of 265 no. bicycle spaces in high-quality, safe and accessible locations for use by future residents and visitors alike.

As stated within the Guidelines, *“the quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria”*. As afore noted, the proposed development is located in a suburban location on appropriately zoned lands in a highly accessible location within the development boundary of Swords.

The proposed development provides for a total of 96 no. car parking spaces. In-curtilage parking is proposed for each of the houses. 4 no. motorcycle spaces are also proposed together with a loading bay is also proposed. For further details, DOWNEY respectfully invite the Planning Authority to refer to that of the proposed site plan prepared by Crawford Architecture together with the Barrett Mahony Consulting Engineers (BMCE) Traffic and Transport Assessment, submitted under separate cover.

1.11 Childcare Facilities: Guidelines for Planning Authorities 2001

Government policy on childcare seeks to expand the availability of childcare places and facilities while enhancing the overall quality of services provided to the community. The *Childcare Facilities Guidelines for Planning Authorities* offer a structured framework to assist both local authorities in the preparation of development plans and the assessment of planning applications, as well as developers and childcare providers in shaping appropriate development proposals.

In the context of residential development, the *Childcare Facilities Guidelines for Planning Authorities* (2001) set out a general benchmark of one 20-place childcare facility per 75 dwellings. However, the application of this threshold must be informed by the existing distribution of childcare services in the locality and the emerging demographic profile of the area in which new housing is proposed.

These recommendations should also be interpreted in conjunction with the more recent guidance set out in *Sustainable Urban Housing: Design Standards for New Apartments* (2023), which states:

“Notwithstanding the Department’s Planning Guidelines for Childcare Facilities, which are currently subject to review and recommend the provision of one childcare facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision in apartment scheme should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile for the area.”

Importantly, the Apartment Guidelines further clarify that:

“One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms”.

In the case of the subject development, when one-bedroom units are excluded, a total of 71 units remain which could reasonably be expected to accommodate families and, by extension, generate demand for childcare services.

According to Census 2022 for the area; the average household size in the Assessment Area was 2.96 persons. Applying this figure to the 71 family-suitable units equates to an estimated resident population of approximately 210 persons. Of this population, 6.8% were recorded as being within the

0–4 age cohort, equating to an estimated 14 children in this age group potentially residing within the proposed development.

Furthermore, the Census also indicates that approximately 54% of preschool-aged children in the Swords-Forest Electoral Division currently attend some form of childcare facility. Applying this participation rate to the projected cohort of 14 children suggests a likely demand for approximately **8 childcare spaces** arising from the proposed development.

It is therefore considered 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.

In light of the above, it is submitted that the proposed development fully accords with the aims and objectives of the *Childcare Facilities Guidelines for Planning Authorities* (2001), as well as the relevant provisions of the *Sustainable Urban Housing: Design Standards for New Apartments* (2023).

DOWNEY respectfully request that the Planning Authority review the Childcare Provision Assessment Report, prepared by DOWNEY and submitted under separate cover for further information.

1.12 Childcare Facilities Operating under the Early Childhood Care & Education (ECCE) Scheme (Circular Letter: PL 3/2016)

The purpose of this Circular, issued on 31st March 2016, is to revise the Childcare Facilities Guidelines for Planning Authorities 2001, and having regard to the extension of the ECCE scheme and the associated increased demands on childcare facilities with effect from September 2016, planning authorities are hereby requested to:

- Expedite all pre-planning application consultation requests from Childcare facility providers in relation to proposals to extend opening hours, to increase capacity or to provide new facilities.
- Expedite, insofar as is possible, consideration of all planning applications or Section 5 declaration submissions in respect of childcare facilities in order to facilitate the expansion of required capacity as appropriate.

As previously noted, and in accordance with the *Childcare Facilities Guidelines for Planning Authorities* (2001), residential developments are generally expected to provide one childcare facility per 75 dwellings. However, a detailed assessment of the proposed development; comprising 109 residential units has been undertaken, considering the unit mix, projected household composition, and local demographic trends within the defined Assessment Area. This analysis conservatively estimates that only 71 of the 109 units proposed are likely to accommodate children. On this basis, the proposal falls below the threshold where the provision of a standalone, on-site childcare facility would be required.

In support of this conclusion, the Planning Authority is referred to the accompanying Childcare Provision Assessment Report, prepared by DOWNEY and submitted under separate cover, which provides further quantitative and policy-based justification. Whereupon this document provides a comprehensive review of local childcare capacity and has identified 16 existing childcare providers within a 1–2 km radius of the subject site, collectively offering approximately 489 childcare places.

This established network demonstrates an already existing strong service coverage and accessibility for prospective residents.

Further analysis of demographic data from Census 2016–2022 for the Swords-Forest Electoral Division indicates a declining population in the 0–4 age cohort, with projections suggesting a continued reduction through to 2030, coinciding with the expected occupancy timeline for the proposed development. Thus, and further, when considered in conjunction with the scheme’s household profile and average household size, it is estimated that the development would generate demand for just eight additional childcare places for which is considered an increase well within the absorption capacity of the existing infrastructure.

DOWNEY submit that the absence of a dedicated childcare facility within the proposed development will not adversely impact the existing provision in the area as one is not deemed to be necessary within this context. The proposal is therefore considered both reasonable and consistent with the guidance set out in Circular PL 3/2016.

Notwithstanding this, it is noted that the provision of a small childcare facility, that would cater for the limited need of c. 16 children, would not be viable to build and operate and it is likely that it would be left vacant.

1.13 Design Manual for Urban Roads and Streets (DMURS)

The Design Manual for Urban Roads and Streets (DMURS) 2013 and as updated in 2023 sets out design guidance and standards for constructing new and reconfiguration of existing urban roads and streets. It also sets out practical design measures to encourage more sustainable travel patterns in urban areas. The transport drawings and documentation prepared by Barrett Mahony Consulting Engineers (BMCE) and submitted under separate cover, provide further details in respect of the compliance of the proposed development with the provision of DMURS.

1.14 Smarter Travel: A Sustainable Transport Future

The Smarter Travel: A Sustainable Transport Future states that *“to achieve the vision of a sustainable transport system, individual lifestyles will have to change and collectively we will have to work progressively on a range of solutions which deal with apparently conflicting goals: economic growth, reduced emissions, less use of motorised transport and better accessibility.”*

The five key goals of this transport policy are as follows:

- *Improve quality of life and accessibility to transport for all and, in particular, for people with reduced mobility and those who may experience isolation due to lack of transport.*
- *Improve economic competitiveness through maximising the efficiency of the transport system and alleviating congestion and infrastructural bottlenecks.*
- *Minimise the negative impacts of transport on the local and global environment through reducing localised air pollutants and greenhouse gas emissions.*
- *Reduce overall travel demand and commuting distances travelled by the private car.*
- *Improve security of energy supply by reducing dependency on imported fossil fuels.*

It is considered that the proposed development complies with Smarter Travel: A Sustainable Transport Future. The proposed development provides sustainable housing within the Swords area and is located close to numerous Dublin Bus services (routes 102, 41B, 41C, 505 series), and is located approximately 1.5km from the future Fosterstown Metrolink Station, with additional connectivity planned via the BusConnects L81 route.

It is also worthy of mention that the proposed scheme will facilitate permeability from the subject site into that of the northern lands, further facilitating the connectivity of Swords.

In light of the above, it is considered that the proposed development is consistent with this national transport policy and will assist in its implementation.

1.15 Cycle Design Manual 2023

Published in September 2023, the new Cycle Design Manual supersedes the National Cycle Design Manual, 2011. The CDM draws on the experience of delivering cycling infrastructure across Ireland over the last decade, as well as learning from international best practice, and has been guided by the need to deliver safe cycle facilities for people of all ages and abilities.

The CDM includes a number of new types of infrastructure such as protected junctions, Dutch style cycle-friendly roundabouts, and parallel crossings which are commonly used in other countries and will now become an option for cycle infrastructure in Ireland. It should be noted that some newer features will require amendments to supporting Regulations and the Traffic Sign Manual so designers should consult with the relevant approving authority prior to installing any of the newer features to ensure applicability of designs/solutions. It is intended that manual will be a live document which will be updated and expanded as required to reflect emerging best practice and feedback from user experience of the manual.

As outlined in the CDM, for cycle infrastructure to cater for the needs of people who currently cycle and to also attract new cycle users to the network, there are five main requirements which designs should fulfil under the headings of:

- i. Safety
- ii. Coherence
- iii. Directness
- iv. Comfort
- v. Attractiveness

It is submitted that the proposed scheme has been thoughtfully designed with a strong emphasis on providing high-quality cycling infrastructure that prioritises safety, coherence, directness, comfort, and attractiveness. The proposed street network and open space provision have been designed with consideration to cycle use and so to ensure for a coherent and direct cycling experience throughout the development. This infrastructure not only enhances the safety and comfort of cyclists but also adds to the overall attractiveness of the scheme, encouraging greater use of cycling as a mode of transport. Additionally, appropriate cycle parking spaces have been strategically located to serve both

the residential and non-residential components of the development, further supporting a safe and convenient cycling environment.

For more detailed information on the cycling infrastructure and its design principles, please refer to the enclosed Traffic and Transport Assessment prepared by Barrett Mahony Consulting Engineers (BMCE), along with the proposed Site Layout prepared by Crawford Architecture, both of which are included within this LRD application. These documents outline the comprehensive approach taken to ensure a cycling-friendly environment within the scheme.

1.16 Birds and Habitats Directive – Appropriate Assessment

The proposed development has been screened for Appropriate Assessment in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/32/EEC). Altamar Ecological Consultant has prepared a report for Screening for Appropriate Assessment together with an Ecological Impact Assessment for the proposed development. For further information in this regard, please refer to both documents for which have been submitted under separate cover.

1.17 The Planning System and Flood Risk Guidelines 2009

These Guidelines require the planning system at all levels to avoid developments in areas at risk of flooding, particularly floodplains, except where there are no suitable alternative sites available in areas at lower risk that are consistent with the objectives of proper planning and sustainable development. Where such development has to take place, in the case of urban regeneration for example, the type of development has to be carefully considered, and the risks should be mitigated and managed through location, layout, and design of the development to reduce flood risk to an acceptable level. Applicants are advised to carefully examine their development proposals to ensure consistency with the requirements of these Guidelines including carefully researching whether there have been instances of flooding or there is the potential for flooding on specific sites and to carry out a site-specific flood risk assessment.

In accordance with these Guidelines, a flood risk assessment has been prepared by Barrett Mahony Consulting Engineers (BMCE) and submitted under separate cover of this application. The various sources of flooding have been reviewed, and the risk of flooding from each source has been assessed. Where necessary, mitigation measures have been proposed. As a result of the proposed mitigation measures, the residual risk of flooding from any source is low. Therefore, it is considered that the proposed development is consistent with the requirements of this national flood risk management policy.

For further information in this regard, we respectfully invite the Council to refer to the enclosed Flood Risk Assessment report prepared by Barrett Mahony Consulting Engineers.

1.18 All Ireland Pollinator Plan 2021-2025

The All-Ireland Pollinator Plan is a shared plan of action which is to bring about a landscape where pollinators can flourish over 2021-2025. To achieve this, the Plan sets out six objectives, namely: (1) Making farmland pollinator friendly, (2) Making public land pollinator friendly, (3) Making private land

pollinator friendly, (4) All-Ireland Honeybee Strategy, (5) Conserving rare pollinators, and (6) Strategic coordination of the Plan.

With respect to the aforementioned, the proposed development has taken into consideration the All-Ireland Pollinator Plan, reflecting the relevant guidelines and proposed measures by providing for an internal network of landscaped open spaces. Moreover, these high-quality landscaped areas retain the existing trees and hedgerows where possible, which will enhance the scheme through safeguarding of mature existing trees and provision of suitable planting within proposed communal greenspaces. Please refer to the Landscape drawings and report prepared by RMDA Landscape Architects for further details on inclusion of the Plan guidelines within the proposed landscape of the scheme.

1.19 National Adaption Framework: Planning for a Climate Resilient Ireland 2024

The National Adaptation Framework: Planning for a Climate Resilient Ireland (2024), prepared by the Department of the Environment, Climate and Communications, serves as a comprehensive guide for Ireland's approach to climate change adaptation. This framework outlines the national strategy for integrating adaptation measures across various sectors and local authorities, aiming to reduce the nation's vulnerability to the adverse effects of climate change while capitalising on potential positive outcomes. It emphasises a pathway planning approach to accommodate various future warming scenarios and promote resilience in infrastructure, ecosystems, and communities. The framework underscores the importance of smarter, faster, and transformative adaptation actions, encouraging a proactive and coordinated response to the challenges posed by climate change.

As outlined in the National Framework, new developments in Ireland are subject to stringent policies to mitigate their potential impact on the climate, ensuring they align with the goals of reducing greenhouse gas emissions and enhancing climate resilience. The planning policy emphasises the necessity for all new developments to integrate climate adaptation and mitigation strategies, recognising that the construction and operation of new infrastructure can significantly contribute to emissions and environmental degradation if not carefully managed.

The policy highlights the importance of "Just Resilience", ensuring that adaptation measures not only address climate change but also do so in a way that is equitable and inclusive, particularly for vulnerable populations. This approach mandates that new developments must consider the socio-economic impacts of climate change and avoid exacerbating existing inequalities. The framework also encourages developments to employ nature-based solutions and sustainable practices that contribute to both mitigation and adaptation, fostering long-term sustainability and resilience in the face of climate change.

It is submitted that the proposed development has been meticulously planned with careful consideration of its potential environmental and climate impacts. The design aims to balance the urgent need for housing in the area with an environmentally sensitive approach, ensuring that development proceeds in a sustainable and responsible manner. Additionally, the proposed development is accompanied by an AA Screening, which we respectfully urge the Council to review for a comprehensive understanding of the measures taken to mitigate environmental impacts.

1.20 Climate Action Plan 2024

The Climate Action Plan 2024 is Ireland's strategic response to the escalating climate crisis, building on previous iterations to set more ambitious targets for reducing greenhouse gas emissions and transitioning to a climate-resilient, low-carbon economy. The plan outlines a comprehensive roadmap for achieving a 51% reduction in emissions by 2030 and reaching net-zero by 2050. It emphasises the critical nature of immediate and sustained action across all sectors, including energy, transport, agriculture, and industry, to mitigate the impacts of climate change. The plan also underscores the importance of a just transition, ensuring that the shift to a greener economy is equitable and inclusive, leaving no community behind.

The Climate Action Plan 2024 places significant emphasis on the role of new developments in contributing to Ireland's climate goals. It acknowledges that the construction and operational phases of new developments can have substantial impacts on the environment and climate. Therefore, the plan mandates that all new developments must integrate climate adaptation and mitigation strategies from the outset.

Moreover, the plan calls for new developments to contribute to the broader goal of reducing emissions across all sectors. For example, in the built environment, new residential and commercial buildings must be designed to minimise their carbon footprint through energy efficiency measures and the use of sustainable materials.

In the context of transport and infrastructure, the plan stresses the need for new developments to support sustainable mobility. This includes the provision of infrastructure that promotes walking, cycling, and the use of public transport, thereby reducing reliance on private vehicles and associated emissions. By embedding these considerations into the planning and design of new developments, the Climate Action Plan 2024 aims to ensure that Ireland's growth and development align with its climate commitments, ultimately contributing to a more sustainable and resilient future.

With respect to the above, the proposed development takes careful consideration of the site's context. In line with the plan's emphasis on sustainable and resilient development, the scheme proposes a compact residential development with appropriate density which integrates significant green space, accessible roof terraces, and green roofs designed to attenuate rainwater. By promoting a compact urban form in a "less vulnerable area", the development adheres to the principles of sustainability and resilience outlined in the Framework, ensuring that it contributes positively to Ireland's climate goals.

2.0 REGIONAL PLANNING POLICY

The key provisions of the regional planning policy as it relates to the proposed development are now set out in the following sections. The key regional policy of relevance includes:

- Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031; and,
- Transport Strategy for the Greater Dublin Area 2022-2042.

2.1 Regional Spatial and Economic Strategy Eastern and Midland Regional Assembly (2019-2031)

The 'Regional Spatial and Economic Strategy' hereafter referred to as RSES was published on the 26th of June 2019. Contained within this document are policies for which contribute to the economic growth of the region over the life of the plan to 2031.

Specifically, the RSES identifies regional assets, opportunities, pressures, and constraints and provides a framework for investment to better manage spatial planning and economic development throughout the Eastern and Midland Region. The RSES is thus tasked with the development of planning policy for future housing needs in the region upon consideration of land, resources, environment, and infrastructure capacity.

Notably, many of the policies and objectives of the RSES complement those of the NPF, notably in respect of sustainable growth and consolidated development. Further to this, the RSES also notes the following Regional Policy Objective (RPO's) that pertain to NPF targets for which are considered applicable in regard to that of the proposed development:

- **RPO 3.2:** *Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built-up area of Dublin city and suburbs and a target of at least 30% for other urban areas.*
- **RPO 3.3:** *Local authorities shall, in their core strategies, identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for new Apartments Guidelines' and the 'Urban Development and Building Heights Guidelines for Planning Authorities'.*
- **RPO 4.3:** *Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built-up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.*
- **RPO 4.8:** *Support the regeneration of underused town centre and brownfield / infill lands along with the delivery of existing zoned and serviced lands to facilitate significant population growth and achieve sustainable compact growth targets of 30% of all new homes to be built within the existing built-up urban area.*
- **RPO 5.4:** *Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas'13, 'Sustainable Urban Housing: Design Standards for New Apartments' Guidelines and 'Urban Development and Building Heights Guidelines for Planning Authorities'14.*
- **RPO 5.5:** *Future residential development supporting the right housing tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin City and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall settlement strategy for the RSES. Identification of suitable residential sites shall be supported by a quality*

site selection process that addresses environmental concerns. **RPO 9.10** In planning for the creation of healthy and attractive places, there is a need to provide alternatives to the car and to prioritise and promote cycling and walking in the design of streets and public spaces. Local authorities shall have regard to the Guiding Principles for 'Healthy Placemaking' and 'Integration of Land Use and Transport' as set out in the RSES and to national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)'.

- **RPO 10.15:** Support the relevant local authorities (and Irish Water where relevant) in the Region to improve storm water infrastructure to improve sustainable drainage and reduce the risk of flooding in the urban environment and in the development and provision at a local level of Sustainable Urban Drainage solutions.

The proposed development will provide 109 no. residential units within the area of Swords. Notably, the proposed development will assist the government in achieving its objectives in terms of the creation of new appropriately located, sustainable residential dwellings. While also complying with all relevant policies and guidelines for which can be defined by three key principles: 1) targeted development within or in close proximity to established urban areas, 2) facilitating the transition to more sustainable modes of transportation such as walking, cycling, and public transport, and 3) enabling urban infill development. The current planning policy paradigm actively encourages the optimal use of underutilised land to accommodate higher-density housing, thereby leveraging existing infrastructure and public transport networks.

Notably, the recent publication of the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024) further aligns with the NPF's overarching objectives, complementing other critical policy documents such as the Height Guidelines (2018), Housing for All (2021) and the Climate Action Plan (2021). Collectively, these documents advocate for higher-density developments in locations well-served by existing transportation routes to mitigate car dependence

The local authority is invited to refer to the Housing Quality Assessment and the accompanying architectural drawing pack prepared by Crawford Architecture, which has been submitted under separate cover, for further detail on the proposed housing scheme.

2.2 Transport Strategy for Greater Dublin Area 2022-2042

Prepared by National Transport Authority and in accordance with Section 12 of the Dublin Transport Authority Act, 2008, Transport Strategy for the Greater Dublin Area 2022-2042 (Transport Strategy) replaces the previous framework, titled the Transport Strategy for the Greater Dublin Area 2016-2035, which was approved by the then Minister for Transport, Tourism and Sport in 2016.

The Transport Strategy sets out how transport will be developed across the region, covering Dublin, Meath, Wicklow, and Kildare, over the period of the strategy and has been approved by the Minister for Transport in accordance with the relevant legislation.

The overall aim of the Transport Strategy is:

“To provide a sustainable, accessible and effective transport system for the Greater Dublin Area which meets the region’s climate change requirements, serves the needs of urban and rural communities, and supports the regional economy.”

Four objectives have been developed to support the delivery of the overall aim of the Transport Strategy, as follows:

“5.3.1 An Enhanced Natural and Built Environment: To create a better environment and meet our environmental obligations by transitioning to a clean, low emission transport system, increasing walking, cycling and public transport use, and reducing car dependency.

5.3.2 Connected Communities and Better Quality of Life: To enhance the health and quality of life of our society by improving connectivity between people and places, delivering safe and integrated transport options, and increasing opportunities for walking and cycling.

5.3.3 A Strong Sustainable Economy: To support sustainable economic activity and growth by improving the opportunity for people to travel for work or business where and when they need to, and facilitating the efficient movement of goods.

5.3.4 An Inclusive Transport System: To deliver a high quality, equitable and accessible transport system, which caters for the needs of all members of society.”

The proposed Large-Scale Residential Development (LRD) at Forest Road, Swords, Co. Dublin, comprising a total of 109 residential units (including houses, duplexes, and apartments), has been carefully designed in a manner that is consistent with the objectives and vision set out in the Transport Strategy for the Greater Dublin Area 2022–2042, prepared by the National Transport Authority (NTA).

The overarching aim of the Transport Strategy is to provide a sustainable, accessible, and effective transport system that supports climate objectives, regional economic growth, and community well-being. The proposed development strongly supports this aim by locating new residential density within an established urban area that benefits from proximity to high-quality transport infrastructure, including current and planned public transport services, active travel routes, and regional connectivity.

The site is strategically positioned being well served by existing Dublin Bus routes (102, 41B, 41C, 505, 505X, 500X, 503, 507). Importantly, the subject site also lies 1.5 km from the planned Fosterstown Metrolink Station, which will significantly enhance rail-based accessibility to Dublin City Centre and the wider metropolitan area. The site will also benefit from future connectivity improvements proposed under BusConnects, particularly the L81 orbital route, further aligning with the strategy’s focus on integrated and sustainable transport.

Thus, the development contributes positively to Objective 5.3.1 – An Enhanced Natural and Built Environment, by promoting sustainable travel behaviour. It also includes the provision of dedicated pedestrian and cycle paths connecting to Forest Road, along with secure bicycle parking facilities, which encourage modal shift from car to active transport. While the proposed layout supports reduced car dependency and is consistent with compact urban development principles that reduce the need for long-distance commuting.

In support of Objective 5.3.2 – Connected Communities and Better Quality of Life, the scheme enhances local mobility and accessibility by linking to nearby educational, recreational, retail, and health services, all within walking or cycling distance. This fosters a walkable neighbourhood structure and aligns with the strategy’s goal to enhance quality of life and community connectivity through safe and integrated travel networks.

Regarding Objective 5.3.3 – A Strong Sustainable Economy, the development is well located to support access to employment centres both locally within Swords and regionally via public and private transport networks. The proximity to Dublin Airport, employment zones, and retail hubs ensures residents will have strong access to job opportunities, which supports sustainable economic growth.

Finally, in response to Objective 5.3.4 – An Inclusive Transport System, the development has been designed with accessibility in mind, incorporating universal access routes, wheelchair car parking spaces, and close links to public transport for those who may not drive. The mixed housing typology also supports tenure diversity and inclusion, aligning with the strategy’s goal of equitable transport access for all.

3.0 LOCAL PLANNING POLICY

The subject site is located in the southern part of Fingal County and, as such, is guided by the policies and objectives set out in the **Fingal County Development Plan 2023–2029**. This section of the report outlines the relevant local planning policy framework applicable to both the site and the proposed development, with reference to the provisions contained within the current Development Plan.

3.1 Fingal County Development Plan (2023-2029)

The **Fingal County Development Plan 2023–2029** serves as the overarching spatial planning framework for the Fingal area within the Dublin region. The Plan sets out a comprehensive vision for the sustainable development of Fingal. It seeks to enhance the county’s social, economic, environmental, and cultural assets in an integrated and balanced manner.

3.1.1 Core Strategy & Settlement Strategy

The purpose of the Core Strategy is to guide the spatial direction of future development and regeneration in the County in line with the principles of compact growth with a key objective to ensure that the quantum and location of development is consistent with National and Regional policy.

The vision of the Fingal Development Plan is to grow the county in a long-term sustainable way to ensure the County continues to develop as a series of well-served, well-connected towns, villages and communities and a low carbon economy. The Plan states that, *“in addressing the manner in which the County will grow, we must be ever cognisant of climate change impacts and ensure that Fingal’s growth strategy is underpinned by sustainable land management practices which result in the compact and consolidated development of existing urban and rural settlements. Adhering to a clearly focused settlement hierarchy which is in line with a wider regional strategy will ensure we can achieve balanced growth within Fingal and provide for a network of settlements which are resilient, people focused and sustainable into the future.”*

As outlined in the Development Plan, *“Fingal County Council will continue to pursue the goals of the NPF of consolidation of Dublin City through the compact development of the Dublin City and Suburbs area within Fingal”*.

The proposed development will form the continued natural extension to Swords Towns development boundary ensuring sustainable development on land well serviced and connected.

3.1.2 Sustainable Placemaking and Quality Homes

In terms of sustainable communities and urban design in residential developments, the Development Plan states that, *“healthy placemaking seeks to promote quality of life through the creation of healthy and attractive places to live, work, visit, invest and study in.”* In this regard, Objective SPQHO1 of the Development Plan aims for creations of sustainable communities, whereas the Council seeks to:

“Ensure that proposed residential development contributes to the creation of sustainable communities and accords with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG 2009 (and any superseding document) and companion Urban Design Manual – A Best Practice Guide, DEHLG 2009 and the Design Manual for Urban Roads and Streets (DMURS) (as revised).”

Moreover, Objective SPQHO2 of the Development Plan sets the Key Principles, seeking to:

“Support development which enhances the quality of the built environment, promotes public health, and supports the 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.”*

A Community and Social Infrastructure Audit and a Childcare Provision Assessment, prepared by DOWNEY, also accompany this LRD application, which provides detailed information and assessment on the existing infrastructure currently serving the Forest Road lands. While notably, the subject lands are located in close proximity to quality and frequent transport links, services and shops, while the proposed design provides for an attractive development with a unique sense of character and place that will suitably integrate with the surrounding area.

3.1.3 Climate Action

As outlined in the Development Plan and in order to ensure that all future development aligns with the principles of energy efficiency and the use of efficient and renewable sources of energy, all applications for significant new developments, or for significant refurbishment projects, shall be required to submit a Climate Action Energy Statement as part of any overall design statement for a proposed development. Chapter 14 Development Management Standards refers in further detail. In this regard, **Policy CAP12** of the Development Plan states:

“All new developments involving 15 residential units and/or more than 1,000 sqm 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.”

As such, a Climate Action and Energy Report, prepared by Fallon Design been prepared and is submitted under separate cover of this application.

3.1.4 Connectivity and Movement

In relation to movement and infrastructure, the Development Plan states that a safe, efficient, effective, and sustainable transportation system is essential to the future economic, social, and physical development of Fingal. The Development Plan prioritises the following measures:

“Land use policies which reduce demand for travel by bringing people and the activities they need to access closer together.

Improved transport options such as walking, cycling and public transport, designing roads and streets to improve conditions for sustainable modes and encouraging behavioural change to more sustainable modes whilst maintaining appropriate levels of access for general vehicular and freight traffic as required.

Control Measures such as mobility management, parking management and traffic management.”

The Plan notes that the integration of new housing, employment, and services with high-capacity public transport corridors in conjunction with attractive walking and cycling networks and permeable links to rail and bus stations can reduce the need to travel and support the functioning of a connected and sustainable transport system. This also has the benefit of extending the catchment of sustainable modes to more people and places to support investment in public transport infrastructure. This will enable the implementation of Transit Oriented Development whereby development is consolidated around existing or planned public corridors at a scale or density that supports the viability of high-capacity public transport infrastructure. Notably, the adopting of this approach allows for the facilitation of compact growth, for which is a recurring theme in this Plan and allows for maximising of the opportunities presented by MetroLink, LUAS, and DART+ proposals, as well as the existing and planned bus improvements under BusConnects.

The Development Plan supports high-density, mixed-use development and trip intensive uses integrated with high-quality walking and cycling infrastructure around high-capacity public transport corridors and nodes, through plan frameworks, in order to generate and reinforce sustainable patterns of growth and development in the County. In this instance, the proposed development provides for a residential development of sustainable density within close proximity to high-frequency public transport in accordance with policies and objectives as set out within the Development Plan, for which includes:

- **Policy CMP3:** *“Provide for an integrated approach to land-use and transportation aimed at minimising the demand for travel and prioritising sustainable modes of transport including walking, cycling and public transport.”*
- **Policy CMO3:** *“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.”*
- **Policy CMP31:** *“Prioritise new road developments that underpin new development areas that support sustainable local development.”*
- **Objective CMO43:** *“Ensure that all new roads and streets are designed to enhance insofar as feasible, the County’s Green Infrastructure network by ensuring adequate replacement and additional planting of native species and pollinators and to ensure that SuDS approaches are used to treat surface water run-off.”*
- **Objective CMO44:** *“Roads and Street Proposals and Nature-Based Solutions Incorporate sustainable drainage features and wildlife crossings including bridges and underpasses into the designs for new road infrastructure and where possible, incorporation of such measures into the existing road network.”*
- **Objective CMO45:** *“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.”*

It is submitted that the proposed development is consistent with these policies and objectives. The development of this suitably zoned land within Swords represents a sequential approach to development for which will ensue connectivity and sustainability. This is further outlined within that of the provided Traffic and Transport Assessment, DMURS Statement and Infrastructure Report, prepared by Barrett Mahony Consulting Engineers (BMCE) and submitted under separate covers as part of the application.

3.1.5 Land Use Zoning

Under the current Fingal Development Plan, the majority of the subject site is zoned as RS – Residential.

The objective of RS zoned land is to: *“Provide for residential development and protect and improve residential amenity.”*

While the vision for RA zoned land is to: *“Ensure that any new development in existing areas would have a minimal impact on and enhance existing residential amenity.”*

It is noted that a portion of the south lands for which building is not proposed upon, is zoned as “GB – Greenbelt”.

The objective of GB zoned land is to: *“Protect and provide for a Greenbelt”*

While the vision for GB zoned land is to: *“Create a rural/urban Greenbelt zone that permanently demarcates the boundary (i) between the rural and urban areas, or (ii) between urban and urban areas. The role of the Greenbelt is to check unrestricted sprawl of urban areas, to prevent coalescence of settlements, to prevent countryside encroachment and to protect the setting of towns and/or villages. The Greenbelt is attractive and multifunctional, serves the needs of both the urban and rural communities, and strengthens the links between urban and rural areas in a sustainable manner. The Greenbelt will provide opportunities for countryside access and for recreation, retain attractive landscapes, improve derelict land within and around towns, secure lands with a nature conservation interest, and retain land in agricultural use. The zoning objective will have the consequence of achieving the regeneration of undeveloped town areas by ensuring that urban development is directed towards these areas.”*

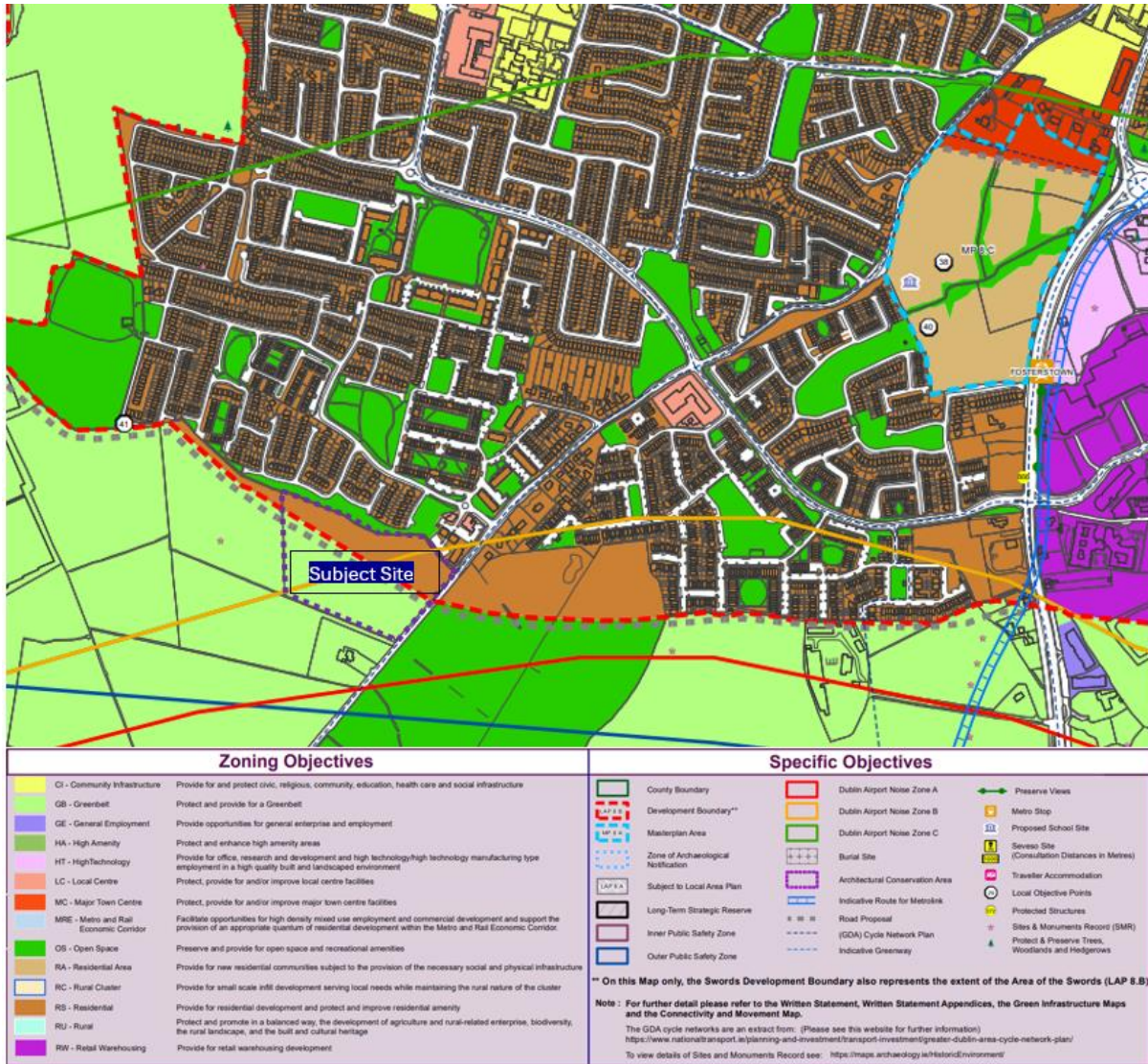


Figure 15. Land Use Zoning Map Extracted from the Development Plan (application site outlined in purple).

Notable use classes permitted in principle to GB zoned areas includes:

(Agricultural Buildings, Agri-Tourism, Bed and Breakfast, Boarding Kennels, Burial Grounds, Childcare Facilities, Community Facility, Farm Shop, Golf Course Guest House, Health Practitioner, Holiday Home/Apartments, Office Ancillary to Permitted Use, **Open Space**, **Recreational/Sports Facility**, Research and Development, **Residential**, Restaurant/Café, Veterinary Clinic, Campsite)

Residential is permitted in principle under the RS zoning pertaining to the northern part of the lands, where the housing is proposed.

It is important to add that the southern lands for which are zoned as GB are included within that of the red-line boundary of the proposal for which these land's purpose is primarily for SuDs to cater for the site with provision of a minor sports pitch.

As outlined, the proposed development is permitted in principle under the zoning objectives pertaining to the subject lands.

3.1.6 Development Management Standards

Chapter 14 of the Fingal Development Plan sets out development standards and criteria that from the policies and objectives of the Development Plan to ensure that development occurs in an orderly and efficient manner and that it is in accordance with proper planning and sustainable development. The following section assesses the main set of standards and criteria required for high-quality, sustainable development:

Criteria	Development Plan Requirement & Compliance of the Proposed Development
14.1 Introduction	
14.1.1 Pre-Planning	<p><i>Section 247 of the Planning and Development Act, 2000 (as amended) provides a formal procedure for applicants to seek Pre-Planning guidance from the Planning Authority in relation to their proposed development.</i></p> <p>As outlined within Part A, section 2.2 of this statement; on the 29th February and 8th October 2024, the design team engaged in two Section 247 Pre-Application meetings, with representatives of the Fingal County Council regarding that of development onto the subject lands of Forest Road. An LRD Pre Planning Meeting under Section 32C was then held on 18th December 2024, following which Fingal County Council provided a written opinion.</p> <p>A full Statement of Response to this opinion has been provided by DOWNEY and submitted under separate cover of the application.</p>
14.2 Key Principles for all Planning Applications	
14.2.1 Universal Access	<p><i>The Council recognises the need for universal equality of access to all aspects of the built and external environment as an essential prerequisite of equal opportunity and the development of an inclusive society. Development proposals, including all new large-scale developments, whether they relate to new buildings, public realm works, changes of use or alterations to existing buildings, must be designed to meet the mobility needs and convenience of all, and incorporate inclusive design principles particularly for vulnerable groups such as the elderly and persons with disabilities.</i></p> <p>It is noted that the design of the proposed development has taken cognisance of people with reduced mobility through the provision of universally accessible dwelling units as well as readily adaptable dwellings. It is submitted that inclusivity and access have fully influenced the design of the scheme, as follows:</p> <ul style="list-style-type: none"> - Building for Everyone, a Universal Design Approach (National Disability Authority) - Universal design Guidelines for Homes in Ireland (National Disability Authority) - Technical Guidance Document Part M 2010 (Department of the Environment & Local Government).

	<p>The proposed scheme is developed with respect to the above-mentioned Guidelines and criteria. For further information in this regard, please refer to the Urban Design Statement prepared by Crawford Architecture and submitted with this LRD application.</p>
<p>14.2.2 Healthy Placemaking</p>	<p><i>Healthy placemaking is a combined approach to planning, design and management of public spaces. Good placemaking design will ensure the success of local areas and spaces which will promote activity and provide vitality to an area, positively contributing to public health and wellbeing. It is essential that new developments have regard to good healthy placemaking principles to create climate resilient environments in which people want to engage, resulting in sustainable, well designed, and strong communities.</i></p> <p>The subject application offers a distinct residential development, providing a range of unique environments for residents to enjoy within different areas of the subject site, from play areas, open space, walkways and a multi-purpose pitch for play. Further to this, the development is appropriately lit and overlooked creating safety onto these areas.</p>
<p>14.2.3 Sustainable Design and Climate Action</p>	<p><i>Outlined in the Development Plan, "Design shall optimise natural ventilation and minimise glare and excess solar gain, avoiding large areas of glazing and providing an appropriate balance between solid and void elements... Measures which will allow occupants to adapt to the impacts of climate change are promoted within developments and include natural ventilation, summer shading, openable windows, the incorporation of living roofs and walls, planting and trees, as well as the inclusion of sustainable urban drainage systems (SuDS) and permeable surfaces in adjoining spaces. Measures to mitigate and adapt to the impacts of climate change shall be appropriate to the special and architectural character of an area."</i></p> <p>Efficiency through design has been achieved in the macro scale in terms of layout and site configuration with good attention to detailing of the individual dwelling plan forms providing energy efficiency and reduced lifetime running costs of the overall scheme.</p> <p>Further, efficient planning and design has been brought into the layouts of the individual dwelling units planned, along with the duplex units. For further information, please refer to the Architectural Drawings and Urban Design Statement prepared by Crawford Architecture along with Landscape Drawings prepared by RMDA Landscape Architecture and Climate and Energy Report, prepared by Fallon Design, all of which are enclosed under separate covers of this LRD application pack.</p>
<p>14.2.4 Safety and Security</p>	<p><i>All residential developments shall refer to Design for Safety and Security guidance contained in the DEHLG Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities 2007.</i></p> <p>It is submitted that the arrangement of the dwellings in relation to the road network and public open spaces, creates for ready views onto the public realm, for which in turn ensures passive surveillance and minimisation of exposed blank façades and walls. In addition, the public</p>

	open spaces are designed in such a way to encourage and support outdoor activities. This is facilitated by appropriate landscape design, providing for permeability of the open spaces, introducing water element in communal spaces, and provision of playground areas within these spaces. For detailed information in this regard, please refer to the Architectural Drawings and Urban Design Statement prepared by Crawford Architecture along with landscape drawings prepared by RMDA Landscape Architecture, all enclosed under separate cover of this LRD application pack.
14.3 Assessments Required for Particular Projects	
14.3.2 Screening for Appropriate Assessment	<p><i>Under Article 6 of the Habitats Directive there is a requirement to establish whether, in relation to plans and projects, if Appropriate Assessment (AA) is required. If, following screening, it is considered that AA is required, the proponent of the plan or project must prepare a Natura Impact Statement.</i></p> <p>Appropriate Assessment has been carried out by Altamar Environmental Consultants. For further information in this regard, please refer to this report prepared by Altamar for which is enclosed under separate cover with this application.</p>
14.4 Sustainable Placemaking and Quality Homes	
14.4.1 Healthy Placemaking: Design Criteria	<p><i>All applications will be required to exhibit high-quality sustainable and inclusive design characteristics, promoting healthy placemaking and wellbeing. This will require that proposed developments demonstrate the manner in which they contribute to active travel, their connectivity to sustainable travel modes, proximity to community infrastructure including recreational facilities and measures to reduce car use, particularly for short journeys. According to Objective DMSO4 of the Development Plan, the Council seeks to ensure:</i></p> <ul style="list-style-type: none"> - 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. - Consideration of shelter, sunlight/daylight, and shadowing.

	<ul style="list-style-type: none"> - 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. <p>It is submitted that the proposed scheme has been designed and revised with reference to the following:</p> <ul style="list-style-type: none"> - Building for Everyone, a Universal Design Approach (National Disability Authority) - Universal design Guidelines for Homes in Ireland (National Disability Authority) - <i>Technical Guidance Document Part M 2010 (Department of the Environment & Local Government).</i> <p>In addition, the design of public realm is in accordance with the standards and requirements of Design Manual for Urban Roads and Streets (DMURS) whereby priority is given to pedestrians and cyclists. All surfaces within the application boundary will be level to ensure the spaces are accessible for everyone. The footpath will be provided along road network, appropriately designed for all users from parents with buggies to the elderly. Further, universal design requirements have been incorporated within the dwellings design, to ensure lifetime living. For detailed information in this regard, please refer to the Architectural Drawings and Urban Design Statement prepared by Crawford Architecture along with Landscape Drawings prepared by RMDA Landscape Architecture, all of which are enclosed under separate cover of this LRD application.</p>
<p>14.4.2 High Quality Urban Design</p>	<p>Design principles shall be based on the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009 and Urban Design Manual – A Best Practice Guide 2009. These guidelines set out twelve design principles that are to be applied in future development schemes. Outlined in Objective DMS05 of the Development Plan, the Council seeks to ensure:</p> <p>All medium to large scale planning applications (in excess of 5 residential units or 300sqm 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:</p> <ul style="list-style-type: none"> - <i>Explain the design principles and design concept of the scheme.</i> - <i>Demonstrate how the twelve urban design criteria (as per the Urban Design Manual – A Best Practice Guide) have 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.</i> - <i>Outline how the development meets the Development Plan Objectives, and the objectives of any Local Area Plan,</i>

	<p><i>Masterplan, Framework Plan, or other similar Plan affecting the site.</i></p> <ul style="list-style-type: none"> - <i>Include photographs of the site and its surroundings.</i> - <i>Include other illustrations such as photomontages, perspectives, sketches.</i> - <i>Outline detailed proposals for open space and ensure the provision of open space is designed in from the beginning when designing a new scheme.</i> - <i>Outline a detailed high quality open space and landscape design plan including specifications, prepared by suitably qualified professionals.</i> - <i>Outline how Green Infrastructure integrates into the scheme.</i> - <i>Demonstrate how the proposed scheme contributes in a positive manner to the public realm and to the local context.</i> - <i>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.</i> <p>An Urban Design Statement has been prepared by Crawford Architecture which we respectfully invite the Council to refer to for further details, for which addresses that of the above points.</p>
14.4.3 Ensuring Accessibility for All	<p><i>In order to ensure that all new development is inclusive and accessible, the Council will have regard to the Universal Design Guidelines for Homes in Ireland and Housing Options for our Ageing Population-Policy Statement and the National Disability Authority's Building For Everyone: A Universal Design Approach 2012 and will seek best practice standards in terms of accessibility. Developers will be required to comply with Part M of the Building Regulations – Access and Use.</i></p> <p>It is submitted that the proposed scheme has been designed cognisant of Section 28 Guidelines, including Universal Design Guidelines and requirements of Part M of the Building Regulations. For further details in this regard, please refer to the Urban Design Statement prepared by Crawford Architecture, enclosed under separate cover of this application.</p>
14.6 Design Criteria for Residential Development in Fingal	
14.6.1 Design and Layout	<p><i>As outlined in the Development Plan, "applications for residential development are required to demonstrate compliance with room sizes, dimensions and overall floor areas set out in national guidance documents including:</i></p> <ul style="list-style-type: none"> - <i>Quality Housing for Sustainable Communities – Best Practice Guidelines, 2007,</i> - <i>Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009 and Urban Design Manual – A Best Practice Guide 2009,</i> - <i>Sustainable Urban Housing: Design Standards for New Apartments 2020.</i>

		<p><i>To demonstrate compliance with the housing and apartment standards as set by policy and guidance, all planning applications shall be accompanied by a 'Schedule of Accommodation' in line with the requirements of the Sustainable Urban Housing: Design Standards for New Apartments 2020.</i></p> <p>A Schedule of Accommodation/Housing Quality Assessment has been prepared by Crawford Architecture as part of the Architectural Pack, enclosed with this LRD submission. The Council is respectfully invited to review and refer to this. Accordingly, it should be noted that all housing and apartment units meet with and/or exceed the minimum standards of room sizes, dimensions, and overall floor areas set out in the relevant planning and development policy and guidelines.</p>
14.6.2 Mix of Dwellings		<p><i>Stated in the Development Plan, "all residential schemes are required to provide for a mix which reflects existing, and emerging household formation, housing demand patterns and trends identified within the specific area of the site and/or within the County as a whole. Applications shall include":</i></p> <ul style="list-style-type: none"> - <i>A dwelling mix providing a balanced range of dwelling types and sizes to support a variety of households.</i> - <i>A detailed breakdown of the proposed unit type and size including a percentage split between one-, two-, three- and four-bedroom units.</i> - <i>A statement outlining how the scheme has been designed to meet the needs of older people/or persons with a disability and/or lifetime homes.</i> - <i>On smaller infill sites, a mix of dwellings which contribute to the overall dwelling mix in the locality.</i> <p>It is submitted that the proposed residential scheme on lands at Forest Road, provide for a mix of houses, duplex units and apartments, with the overall proposed residential unit total proposed at 109 no. units, with less than 50% of the units being 1 bedroom This was set out previously within this report.</p>
14.6.3 Residential Density		<p><i>In general, the density and number of dwellings to be provided within residential schemes should be determined with reference to Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009. Development should also be consistent with the policies and objectives set out in Chapter 3 Sustainable Placemaking and Quality Homes and should promote appropriate densities, having regard to factors including the location of the site, accessibility to public transport and the principles of sustainability, compact growth and consolidation.</i></p> <p>It is submitted that the proposed development provides for 109 no. dwellings on a site of 2.14ha (developable area), which facilitates a net density of 51 units per hectare which is deemed acceptable.</p>
14.6.4 Residential Standards		<p>The minimum size of habitable rooms for houses/apartments/and flats shall conform with appropriate National guidelines/ standards in</p>

	<p>operation at the date of application for planning permission. Outlined in Objective DMSO19 of the Development Plan, the Council seeks to:</p> <p><i>“Require that applications for residential developments comply with all design and floor area requirements set out in:</i></p> <ul style="list-style-type: none"> - <i>Quality Housing for Sustainable Communities – Best Practice Guidelines 2007,</i> - <i>Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009, the companion Urban Design Manual – A Best Practice Guide, DEHLG 2009,</i> - <i>Sustainable Urban Housing: Design Standards for New Apartments 2020.”</i> <p>In addition; as stated in:</p> <p>Objective DMSO20 of the Development Plan, <i>“All planning applications for residential development shall be accompanied by a Schedule of Accommodation to demonstrate compliance with housing and apartment standards.”</i></p> <p>Objective DMSO21 of the Development Plan, <i>“Require that all planning applications for residential development include floor plans for each room indicating typical furniture layouts and door swings.”</i></p> <p>The proposed scheme has been designed cognisant of relevant planning and development policy, as well as Section 28 Guidelines. For further details in this regard, please refer to the Architectural Drawings, Housing Quality Assessment, and Urban Design Statement prepared by Crawfords Architecture and enclosed under separate covers with this application.</p>
14.6.5 Open Space Serving Residential Development	<p><i>As stated in the Development Plan, “All applications for residential development are required to demonstrate the provision of private open space to serve the future requirements of the occupants of a residential unit. All multi-unit residential schemes are in addition, required to indicate all communal and public open space which will serve the scheme. Further, applicants shall at planning application stage provide a written schedule of all open space and shall submit a colour-coded drawing clearly indicating all areas of private, communal and public open space. The drawing should indicate (i) areas to be taken in charge by the Local Authority (ii) areas which will be within the private management of the homeowner and (iii) areas which will be the responsibility of a private management company. Full details of any short fall in provision shall also be stated.”</i></p> <p>It is submitted that the architectural drawings and landscape architecture drawings have set out the areas of open space. A Taken In Charge Drawing has also been prepared by Crawford Architecture, which would include the main roads and areas of open space.</p>

	For further details in this regard, please refer to the Architecture drawings and documents prepared by Crawford Architecture, together with the Landscape Drawings prepared by RMDA Landscape Architecture, all enclosed with this application.
14.6.6 External Factors for Consideration	<p><i>Outlined in sub-section 14.6.6.1 of the Development Plan, "All applications for residential development must ensure that the layout and design of individual units and accompanying public realms are designed in a manner which maximises daylight and sunlight." According to Objective DMSO22 of the Development Plan:</i></p> <p><i>"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."</i></p> <p>The proposed development complies with the principles of Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice – (Building Research Establishment Report) 2011 and any updated guidance. 3D Design Bureau have prepared a Daylight Sunlight Analysis report, enclosed with this LRD application which we respectfully invite the Council to refer to.</p> <p><i>Stated in sub-section 14.6.6.3, "All proposals for residential development, particularly apartment developments, over three storeys high, shall provide for acceptable separation distances between blocks to avoid negative effects such as excessive overlooking, overbearing and overshadowing and to provide sustainable residential amenity conditions and open spaces." As per Objective DMSO23, the Council seeks:</i></p> <p><i>"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."</i></p> <p>Notably, the Compact Settlement Guidance (2024) discusses suitable separation distances at 16m. The proposed development achieved various levels of separation distance between opposing windows. Again, as noted the guidance and development plan in certain cases do facilitate development having regard to the layout, orientation, and location of units proposed as there are areas where there will be no impact on existing nor proposed housing units. It is viewed that the proposed development is designed in accordance with Objective DMSO23 of the Development Plan with suitable separation distances and unit orientation provided so to not unreasonably prejudice the amenity of existing nor perspective occupants.</p>
14.7 Apartment Development/Standards	<i>Outlined in Objective DMSO24 of the Development Plan, the Council seeks to ensure:</i>

	<p><i>"All applications for apartment development are required to comply with the Specific Planning Policy Requirements (SPPRs), the standards set out under Appendix 1 and general contents of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020 (or updated guidance as may be in place at the time of lodgement of the planning application)."</i></p> <p>It is submitted that the proposed scheme has been made cognisant of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2022 and in compliance with the Specific Planning Policy Requirements (SPPRs). For further details in this regard, please refer to the Architectural Drawings and Urban Design Statement prepared by Crawford Architecture, along with that of the Energy & Sustainability Report prepared by Fallon Design, with all enclosed within this LRD application.</p>
14.7.1 Apartment – Unit Size and Mix	<p><i>As reiterated in the Development Plan an according to Table 14.7 of the Plan, Specific Planning Policy Requirement 3 (SPPR 3) sets out the minimum floor areas for apartments – see extract below.</i></p> <p>The proposed scheme provides for different apartment/duplex unit types along with different house type(s). All proposed units within the proposed scheme meet and/or exceed the minimum requirements of the aforesaid standards. For full details, please refer to the Schedule of Accommodation prepared by Crawford Architecture along with provided plans prepared by them also and all submitted under separate cover with this application.</p>
14.7.2 Floor to Ceiling Heights	<p><i>Outlined in the Development Plan and in line with SPPR 5 of the Apartment Guidelines, "ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. 3.0m should be considered in such instances."</i></p> <p>The proposed floor to ceiling heights of the units within the scheme have been designed in accordance with SPPR 5 of the Apartment Guidelines. For full details in this regard, please refer to the Architectural Drawings prepared by Crawford Architecture, enclosed under separate cover of this application.</p>
14.7.3 Internal Storage	<p><i>The Development Plan notes, "Internal storage within an apartment unit shall be provided in accordance with the Sustainable Urban Housing Design Standards for New Apartments as set out in Appendix 1 and Section 3.30 to 3.34 of the Apartment Guidelines."</i></p> <p>The proposed development provides for convenient and well-designed storage for all accommodation proposed, for which is in accordance with the Sustainable Urban Housing Design Standards for New Apartments as set out in Appendix 1 and Section 3.30 to 3.34 of the Apartment Guidelines. The Council are respectfully invited to refer to the Architectural Drawings and Schedule of Accommodation, prepared by Crawford Architecture for further details of this compliance.</p>

14.7.4 Dual Aspect	<p><i>Reiterated in the Development Plan and in line with SPPR 4 of the Apartment Guidelines:</i></p> <ul style="list-style-type: none"> - <i>There shall be a minimum of 33% dual aspect units required in more 'central and accessible urban locations', where it is necessary to achieve a quality design in response to the subject site characteristics and to ensure good street frontage.</i> - <i>In 'suburban or intermediate locations' it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.</i> - <i>For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, the Apartment Guidelines state that Planning Authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.</i> <p>It is submitted that the proposed development provides for a sufficient quantum of dual aspect units with 100% of the apartments in Block A being dual aspect and 67% of the units in Block B being dual aspect. This is consistent with the Guidelines. The Council are respectfully invited to refer to the Architectural Drawings, Design Statement and Housing Quality Assessment for further details in this regard.</p>
14.7.6 Private Open Space	<p><i>Stated in the Development Plan, "Every apartment shall have private amenity space in the form of gardens or patios/terraces for ground floor apartments and balconies at upper levels... The minimum areas for private amenity are set out in Appendix 1 and Section 3 of the Apartment Guidelines."</i></p> <p>It is submitted that the proposed development is in keeping with the requirements and standards of the Apartment Guidelines –2023. For full details in this regard, please refer to the Architectural Drawings and Schedule of Accommodation prepared by Crawford Architecture.</p>
14.7.8 Public Open Space	<p><i>As set in Chapter 4 and Section 14.13 of the Development Plan, whereas in Chapter 4 it is stated that "For all developments with a residential component, the overall standard for public open space provision is a minimum 2.5 hectares per 1000 population. In general, this shall be provided at a ratio of 75% Class 1 and 25% Class 2."</i></p> <p>The proposed development comprises 12% of the RS zoned part of the site as public open space.</p> <p>However, a large public park is also proposed on the GB zoned part of the site. This extends to 23,107sq.m. in area and greatly exceeds the minimum requirement of 2.5 hectares per 1000 population.</p>
14.7.9 Communal Facilities	<p><i>Outlined in the Development Plan, "Applicants are encouraged to provide for a range of communal facilities for residents of a scheme, particularly as part of larger apartment developments."</i></p>

	<p>The majority of units in this development are own-door units, with 41 apartments being proposed. Areas of communal open space are proposed as part of this development as well as a large public park.</p>
14.7.10 Building Lifecycle Report and Management Companies	<p>Stated in the Development Plan, <i>“planning applications for apartment developments within Fingal will be required to submit a building lifecycle report. This should include:</i></p> <ul style="list-style-type: none"> - <i>An assessment of long-term running and maintenance costs as they would apply on a per residential unit basis at the time of application, as well as demonstrating what measures have been specifically considered to effectively manage and reduce costs for the benefit of residents.</i> - <i>Property Management of the Common Areas of the development</i> - <i>Service Charge Budget</i> - <i>Accordingly, when granting planning permission for such developments, which are not proposed to be Taken in Charge by the Council, the Guidelines state that Planning Authorities can attach appropriate planning conditions that require:</i> <ul style="list-style-type: none"> - <i>Compliance with the MUD Act,</i> - <i>Establishment of an Owners Management Company (OMC) and,</i> - <i>Establishment and ongoing maintenance of a sinking fund commensurate with the facilities in a development that require ongoing maintenance and renewal.</i> <p>It is submitted that a Building Lifecycle Report has been prepared by Crawford Architecture and provided under separate cover for which illustrates compliance. The Council is respectfully requested to review this.</p>
14.7.11 Security and Surveillance	<p><i>Stated in the Development Plan, “Within the scheme, the design should include for the maximisation of natural surveillance of all common areas, streets, and parking areas and for active frontage to the building facades. Particular attention should be paid to the location of entrance doors and lobbies to ensure that such areas are well lit, have high levels of active surveillance and are overlooked. The design should also give due consideration to the security and privacy levels afforded to ground floor apartments.”</i></p> <p>It is submitted that passive surveillance and security are an integral part of the proposed scheme. Proposed dwelling units are sited so to allow for active surveillance in areas of open space in proximity to the proposed dwellings and so provide an element of security as per guidance. For full details in this regard, please refer to the Architectural Drawings prepared by Crawford Architecture.</p>
14.7.12 Refuse Storage in Apartment Development	<p><i>According to the Development Plan, “Provision shall be made for the storage and collection of waste in all applications for apartment development. Refuse facilities should be accessible to each apartment stair/lift core and be adequately sized to cater for the projected level of waste generation, types, and quantities. Within apartments, there</i></p>

		<p><i>should be adequate provision for the temporary storage of segregated materials prior to removal to communal waste storage. Waste storage areas should not be on the public street and should not be visible to or accessible by the general public."</i></p> <p>The proposed development provides for convenient and well-designed storage for refuse. Subsequently an Operational Waste Management Plan, prepared by Wave Dynamics, together with Architectural Drawings and Schedule of Accommodation prepared by Crawford Architecture and that of the landscaping pack prepared by RMDA Landscape Architects have been provided for which illustrate compliance with the above.</p>
14.8 Housing Development/Standards		
14.8.1 Floor Areas		<p><i>Outlined in the Development Plan, "The minimum size of habitable rooms for houses shall conform with dimensions as set out in Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes Sustaining Communities 2007 or the appropriate National Guidelines standards in operation at the date of lodging the application for planning permission."</i></p> <p>DOWNEY notes that all residential units within the proposed scheme comply with habitable room requirements of the Development Plan. For further details, please refer to the Architectural Drawings, Housing Quality Assessment, and Urban Design Statement prepared by Crawford Architecture.</p>
14.8.2 Separation Distances		<p><i>Set out in Objective DMSO26 of the Development Plan, the Council seeks to:</i></p> <p><i>"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)."</i></p> <p>In this regard, the proposed development archives various levels of separation distance between opposing windows. Whereupon on review of the proposed plans it is evident that there will be no impact on existing or proposed housing units, i.e., end house locations. Notably, the housing units have been provided with high-quality rear gardens, where no undue overlooking on neighbour housing nor overshadowing will occur. For further details in this regard, please refer to the Architectural Drawings and Housing Quality Assessment for further details in this regard.</p>
14.8.3 Private Open Space		<p><i>Outlined in Objective DMSO27 of the Development Plan, the Council seeks to:</i></p> <ul style="list-style-type: none"> - <i>"Ensure a minimum open space provision for dwelling houses (exclusive of car parking area) as follows:</i>

	<p>- 3-bedroom houses or less to have a minimum of 60sqm of private open space located behind the front building line of the house."</p> <p><i>In addition, Objective DMSO28 of the Development Plan:</i></p> <p><i>"Allow a reduced standard of private open space for one- and two-bedroom townhouses only in circumstances where a particular design solution is required such as to develop small infill/corner sites. In no instance will the provision of less than 48sqm of private open space be accepted per house."</i></p> <p>For full details in this regard, please refer to the Architectural Drawings and Housing Quality Assessment prepared by Crawford Architecture and that of the landscaping pack prepared by RMDA Landscape Architects.</p>
14.9 Residential Development – General Requirements	
14.9.3 Roads and Footpaths	<p><i>According to the Development Plan, "The design of streets in urban areas is guided by the Design Manual for Urban Roads and Streets (DMURS) and the DMURS Interim Advice Note – Covid 19 Pandemic Response 2020. This Plan will support the implementation of DMURS principles for all new transportation and public realm schemes within the County."</i></p> <p>It is submitted that the proposed development has been made cognisant of the DMURS and the DMURS Interim Advice Note – Covid 19 Pandemic Response 2020. The Council are invited to refer to the Engineering Pack prepared by Barrett Mahony Consulting Engineers (BMCE) for further information.</p>
14.9.4 Open Plan Estates	<p><i>Outlined in the Development Plan, "It is important to maintain the openness of residential development, particularly schemes where openness is a defining feature of the development. This can be achieved through the removal of the exempted development rights with regard to the provision of boundary walls, railing or other features to the front of houses."</i></p> <p>It is submitted that the proposed scheme provisions for a large area of open space with, with permeability and movement key features of the development. Future connectivity to adjoining lands has also been carefully considered, including an indicative design/layout for a pedestrian connection to the adjoining residential area to the north. For further details in this regard, please refer to the Architectural Drawings and Urban Design Statement prepared by Crawford Architecture and the landscaping pack prepared by RMDA Landscape Architecture.</p>
14.9.5 Gated Communities	<p><i>According to the Objective DMSO30 of the Development Plan, the Council seeks to:</i></p> <p><i>"Prohibit proposals that would create a gated community for any new residential developments."</i></p>

	It is submitted that the proposed scheme is not a gated development and will integrate with the area, with permeability and movement key features of the development.								
14.9.6 Taking in Charge and Management Companies	<p><i>Outlined in the Development Plan, "In residential developments which are not proposed to be taken in charge by the Council, evidence will be required that Private Management Companies are to be established to manage developments on completion with a requirement for compulsory membership for all purchasers of property within the scheme. If a development (or part thereof) is to be Taken in Charge by the Council, the applicant shall agree at planning application stage those areas to be taken in charge by the Local Authority with such areas clearly delineated on a layout plan."</i></p> <p>The proposed development will in the main be taken in charge by the Planning Authority and a Taken in Charge Drawing is included in the application.</p> <p>For parts of the scheme that would be privately managed, a Management Company shall be established following receipt of Planning Permission.</p>								
14.13 Open Space									
14.13.1 Hierarchy and Accessibility	<p>As per Objective DMSO49 of the Development Plan, the Council seeks to:</p> <p><i>"Integrate and provide links through adjoining open spaces to create permeable and accessible areas, subject to Screening for Appropriate Assessment and consultation, including the public, as necessary."</i></p> <p>It is submitted that the public open spaces envisaged within the scheme are designed to be permeable and accessible; the hierarchy of these open spaces are in keeping with requirements of Table 14.11 of the Development Plan. For further details in this regard, please refer to the Architectural Drawings and Urban Design Statement prepared by Crawford Architecture and the landscaping pack prepared by RMDA Landscape Architecture.</p>								
14.13.2 Quantity	<p>According to Objective DMSO51 of the Development Plan, the Council:</p> <p><i>"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."</i></p> <p><i>The Development Plan set the thresholds for open space provision as below:</i></p> <p>Table 14.12: Recommended Quantitative Standards (Sustainable Residential Developments in Urban Areas, Guidelines for Planning Authorities 2009)</p> <table border="1"> <thead> <tr> <th>Land use</th><th>Minimum public open space standards</th></tr> </thead> <tbody> <tr> <td>Overall standard</td><td>2.5 hectares per 1000 population</td></tr> <tr> <td>New residential development on greenfield sites/LAP lands</td><td>12% - 15% of site area</td></tr> <tr> <td>New residential development on infill/brownfield sites</td><td>12% of site area</td></tr> </tbody> </table>	Land use	Minimum public open space standards	Overall standard	2.5 hectares per 1000 population	New residential development on greenfield sites/LAP lands	12% - 15% of site area	New residential development on infill/brownfield sites	12% of site area
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New residential development on greenfield sites/LAP lands	12% - 15% of site area								
New residential development on infill/brownfield sites	12% of site area								

	<p>The proposed development comprises 12% of the RS zoned part of the site as public open space.</p> <p>However, a large public park is also proposed on the GB zoned part of the site. This extends to 23,107sq.m. in area and greatly exceeds the minimum requirement of 2.5 hectares per 1000 population.</p> <p>According to Objective DMSO56 of the Development Plan, the Council seeks to:</p> <p><i>“Ensure every home within a new residential scheme is located within 150 metres walking distance of a pocket park, small park, local park, urban neighbourhood park or regional park.”</i></p> <p>In response to this, the public open space envisaged in the scheme, is provided in several locations of the subject site, providing close proximity to all proposed developments. This is suggested to provide for a balanced spread of public open spaces and an enhanced accessibility to these spaces. For further details in this regard, please refer to the Landscape Drawings prepared by RMDA Landscape Architecture.</p>
14.13.3 Quality	<p><i>The most relevant Objectives from the Development Plan with regard to the proposed scheme are as follows:</i></p> <p>Objective DMSO63: <i>“Ensure open spaces are not located to the side or the rear of housing units.”</i></p> <p>Objective DMSO64: <i>“Ensure open space provision is suitably proportioned and inappropriate narrow tracts are not provided.”</i></p> <p>In response to this, the scheme is submitted to provide for quality open spaces, proposed in various locations within the subject site. Large areas of open space are primarily located centrally and on the southern areas of the subject lands. Notably the overall landscape plan ties into the established landscape hierarchy of the residential area of Rathingle, with the proposed design allowing for sympathetic reflection and linkage. This also promotes integration of the proposed development and movement of residents of both the proposed and existing area.</p> <p>For further details in this regard, please refer to the Architectural Pack. Prepared by Crawford Architecture, together with the landscaping pack prepared by RMDA Landscape Architecture, for further information.</p> <p><i>In addition, Objective DMSO68 seeks to: “Provide appropriately scaled children’s playground facilities within residential development. Playground facilities shall be provided at a rate of 4sqm 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.</i></p> <p><i>And Objective DMSO69 seeks to: “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 50sqm of playground.”</i></p>

	<p>It is submitted that a Play Strategy has been incorporated within the landscape design of the scheme, comprising of provision for formal play area within the open spaces. For further details in this regard, please see Landscape Drawings and Rationale report prepared by RMDA Landscape Architecture, for which have been submitted under separate cover.</p> <p><i>The Development Plan outlines the requirements for private open space provision for apartments and duplexes as below:</i></p> <p>Table 14.14: Open Space requirement for Apartment and Duplex Units</p> <table><tr><th>Unit type</th><th>Private amenity space</th><th>Communal amenity space</th></tr><tr><td>Studio</td><td>4 sq. m.</td><td>4 sq. m.</td></tr><tr><td>One bed</td><td>5 sq. m.</td><td>5 sq. m.</td></tr><tr><td>Two bed</td><td>7 sq. m.</td><td>7 sq. m.</td></tr><tr><td>Three bed</td><td>9 sq. m.</td><td>9 sq. m.</td></tr></table> <p>It is noted that each residential unit benefits from the provision of adequately sized private open space in the form of gardens, balconies, or patios/terraces (designed in accordance with quantitative and qualitative standards), with the units at ground floor level provided with appropriate boundary treatments to ensure privacy and security whilst also providing visual interest and distinction between spaces.</p> <p>For further information on the private open space proposed as part of this application, please refer to the architectural plans and Urban Design Statement prepared by Crawford Architecture, and the landscaping pack prepared by RMDA Landscape Architecture.</p>	Unit type	Private amenity space	Communal amenity space	Studio	4 sq. m.	4 sq. m.	One bed	5 sq. m.	5 sq. m.	Two bed	7 sq. m.	7 sq. m.	Three bed	9 sq. m.	9 sq. m.
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14.14 Community Infrastructure																
14.14.1 Community Facilities	<p>According to Objective DMS078 of the Development Plan, <i>“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:</i></p> <ul style="list-style-type: none">- <i>An assessment of existing community and social infrastructure facilities within 1 km of the subject site.</i>- <i>An assessment of the need in terms of necessity, deficiency, and opportunities to enhance/share existing facilities based future population projections for the area.</i>- <i>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.”</i> <p>In response to this, A Community and Social Infrastructure Audit and a Childcare Provision Assessment were both undertaken by DOWNEY and are submitted as part of the application. The Council are respectfully invited to refer to these for further details.</p>															

14.17 Connectivity & Movement	
14.17.2 Bicycle Parking	<p>Outlined in Objective DMSO109 of the Development Plan, the Council seeks to: “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, where feasible, practical and appropriate, having regard to local, national and international best practice.”</p> <p>The proposed development provides considerable secure, covered bicycle parking for the houses, duplex units and apartments as part of the development proposal. This facilitates and will encourage future residents and visitors to use sustainable modes of transportation. It is considered that the bicycle parking provision as part of the proposed development is consistent with Table 14.17 - Bicycle Parking Standards of the Development Plan, and Section 4.15 of the 2022 guidelines Design Standards for Apartments.</p> <p>For further details, please refer to the Architectural Drawings prepared by Crawford Architecture together with that of the and Traffic and Management Plan and drawings prepared by Barrett Mahony Consulting Engineers (BMCE).</p>
14.17.3 Mobility Management Plans	<p>As per Objective DMSO111 of the Development Plan, “For all new developments which are likely to generate a significant demand for travel, require the preparation and submission of a Mobility Management Plan as part of the development management process. This requirement includes existing developments that are expanding or intensifying their use.”</p> <p>Barrett Mahony Consulting Engineers (BMCE) have prepared a Transport and Mobility Statement and Mobility Management Plan, submitted as part of this LRD application, which we respectfully invite the Council to refer to under separate cover.</p>
14.17.4 Traffic and Transport Assessment	<p>Outlined in Objective DMSO113 of the Development Plan, the Council, “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.”</p> <p>Barrett Mahony Consulting Engineers (BMCE) have prepared a Traffic and Transport Assessment for which is submitted as part of this LRD application, which we respectfully invite the Council to refer to.</p>
14.17.7 Car Parking	<p>The Development Plan defines 2 Car Parking Zones to ensure adequate residential parking provision and the control of destination car parking with regard to access to public transport services. It also outlines standards for car parking provision as per the Table below.</p>

	Table 14.19: Car Parking Standards				
	Land Use Category		Zone 1: Developments within 800m of a high-quality bus service, or 1600m of an existing or planned Luas/DART/Metro Rail station or in lands zoned Major Town Centre***		
			Zone 2: All other areas		
	Residential				
	Residential (1-2 Bedroom)	0.5	Max	1 plus 1 visitor space per 5 units	Norm
	Residential (3-3+ Bedroom)	1	Max	2 plus 1 visitor space per 5 units	Norm
	<p>It is proposed to provide 96 No. car parking spaces for the development, above the maximum provision of 76 No. spaces are detailed within Table 3-1.</p> <p>However, the proposed provision must be seen in the context of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (Department of Housing, Local Government and Heritage, Jan 2024).</p> <p>Section 5.3.4 of this document requires, that in city centres and urban neighbourhoods, car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 No. space per dwelling. This maximum provision equates to 109 No. spaces. The proposed provision of 96 No. spaces equates to 88% of the maximum permissible quantum under the 2024 Guidelines for Compact Settlements.</p> <p>For further details, the Planning Authority are invited to refer to the Traffic and Transport Assessment, Transport prepared by Barrett Mahony Consulting Engineers (BMCE).</p>				
14.17.8 Accessible Car Parking	<p><i>Outlined in the Development Plan, "Provision for designated Age Friendly car parking and Parent and Child car parking provision is encouraged. Disabled car parking spaces should be provided as close as reasonably possible to building entrance points and allocated and suitably sign posted for convenient access."</i></p> <p>The proposed development is served with an appropriate level of accessible car parking bays. The Council are respectfully invited to refer to the Architectural Drawings prepared by Crawford Architecture along with the Traffic and Transport Assessment prepared by Barrett Mahony Consulting Engineers (BMCE).</p>				
14.17.10 Electric Vehicle Parking	<p><i>Set out by the Development Plan, "All multi-unit residential developments shall incorporate EV charging points at 20% of the proposed parking spaces and appropriate infrastructure (e.g. ducting) to allow for future fit out of a charging point at all parking spaces."</i></p> <p>All parking bays are provided with EV charging.</p>				
14.18 Infrastructure and Natural Heritage	Green and	<p><i>According to Objective DMSO124 of the Development Plan, the Council "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 2000sqm."</i></p>			

	<p>It is submitted that a Green Infrastructure Plan has been incorporated within the Landscape Drawings prepared by RMDA Landscape Architecture, enclosed with this application, which we respectfully invite the Council to refer to.</p>
14.8.1 Tree Policy	<p><i>The most relevant Objectives of the Development Plan in relation to the proposed scheme are as below:</i></p> <p>Objective DMSO127: <i>“Require the use of native species where appropriate in new developments in consultation with the Council.</i></p> <p>Objective DMSO128: <i>“Ensure trees, hedgerows and other features which demarcate townland boundaries are preserved and incorporated where appropriate into the design of developments.”</i></p> <p>Objective DMSO131: <i>“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 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.”</i></p> <p>Objective DMSO133: <i>“Where new trees are being planted, these will be located so they do not cause future interference to streetlights, typically trees shall be located so there is a distance of no less than 7m from the centre of the main stem to the lighting pole.”</i></p> <p>Objective DMSO134: <i>“Regardless of development size or type, applicants must submit an overall site summary quantifying and detailing the following:</i></p> <ul style="list-style-type: none"> - <i>tree and hedgerow removal;</i> - <i>tree and hedgerow retention; and</i> - <i>new tree and hedgerow planting.</i> <p>The proposed scheme in terms of planting and overall landscaping has been designed with consideration of the above points. The Planning Authority are respectfully requested to refer to that of the landscaping pack, prepared by RMDA Landscape Architects for which illustrated compliance with the aforementioned guidance and objectives.</p> <p>Objective DMSO135: <i>“Avoid any new tree planting in areas which have sub-surface archaeology preserved in situ. There should be a minimum set-back of 20m from the boundaries of archaeological remains for any tree planting; 30m set-back from skeletal remains.”</i></p> <p>Objective DMSO136: <i>“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</i></p>

	<p><i>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.”</i></p> <p>It is submitted that the proposed development has been made cognisant of the above-mentioned Objectives. Again, the Arboricultural pack including relevant drawings and information has been prepared by Charles McCorkell as part of this LRD application pack, which we respectfully invite the Council to refer to under separate cover.</p>
14.18.2 Natural Heritage	<p>14.8.2.1 Biodiversity</p> <p>The most relevant Objectives of the Development Plan in relation to the proposed scheme are as following:</p> <p>Objective DMSO138: <i>“Ensure all development and infrastructure proposals include measures to protect and enhance biodiversity leading to an overall net biodiversity gain.”</i></p> <p>Objective DMSO139: <i>“Ensure that an ecological study is carried out for the development site covering habitats and flora, breeding birds, bats and amphibians to identify existing ecological valuable features and the species composition of the site.”</i></p> <p>Objective DMSO140: <i>“Protect existing landscape features such as scrub, woodland, large trees, hedgerows, meadows, ponds and wetlands which are of biodiversity or amenity value and/or contribute to landscape character and ensure that proper provision is made for their protection and management.”</i></p> <p>Objective DMSO141: <i>“Incorporate habitat features (new or existing) and other conservation measures for species of conservation interest (e.g., legally protected species or Amber and Red listed bird species) in the Integrated Green Infrastructure Plan.”</i></p> <p>Objective DMSO143: <i>“Require all new developments to incorporate habitat facilities for wildlife species as appropriate including Kestrel, Peregrine, Swifts, House Sparrows, Swallow, Starling, Bats and insects in or on buildings facades.”</i></p> <p>It is submitted that the aforesaid Objectives have all been fully addressed in the landscape drawings prepared by RMDA Landscape Architecture and Ecological Pack prepared by Altemar, which we respectfully invite the Council to refer to.</p> <p>14.18.2.2 Biodiversity Conservation in Fingal</p> <p>The most relevant Objectives of the Development Plan in relation to the proposed scheme are as following:</p> <p>Objective DMSO144: <i>“Ensure Screening for Appropriate Assessment and, where required, full Appropriate Assessment is carried out for all plans and projects in the County which, individually, or in combination with other plans and projects, are likely to have a significant direct or indirect impact on any European site or sites.”</i></p> <p>Objective DMSO145: <i>“Ensure that sufficient information is provided as part of development proposals to enable Screening for Appropriate</i></p>

	<p><i>Assessment to be undertaken and to enable a fully informed assessment of impacts on biodiversity to be made."</i></p> <p>Objective DMSO146: <i>"Ensure that Natura Impact Statements (NIS) and any other ecological impact assessments submitted in support of proposals for development are carried out by appropriately qualified professionals and that any necessary survey work takes place in an appropriate season."</i></p> <p>Objective DMSO147: <i>"Ensure planning applications for proposed developments likely to have significant direct or indirect impacts on any European Site or sites are accompanied by a Natura Impact Statement prepared in accordance with the Guidance issued by the Department of the Environment, Heritage and Local Government (Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, 2009)."</i></p> <p>Objective DMSO148: <i>"Ensure ecological impact assessment is carried out for any proposed development likely to have a significant 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, or rare and threatened Flora Protection order and Red Data Book species and their habitats. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment."</i></p> <p>A Screening for Appropriate Assessment and Ecological Impact Assessment have both been prepared by Altemar and submitted under separate cover. It is respectfully requested that the Planning Authority review this information.</p>
14.19.2 Archaeological Heritage	<p>Objective DMSO169 – Archaeological Impact Assessment</p> <p><i>" All development proposals which may have implications for archaeological heritage shall be accompanied by an Archaeological Impact Assessment. This assessment will consist of the following: "</i></p> <p><i>Site inspection/walk-over survey,</i></p> <p><i>" Archaeological heritage of the receiving area, "</i></p> <p><i>Examination of upstanding or visible features or structures, "</i></p> <p><i>Topographical assessment including historic townland boundaries, "</i></p> <p><i>Physical description and photographic record of the archaeological feature, site or object, "</i></p> <p><i>Examination of existing or new aerial photographs or satellite or other remote sensing imagery, "</i></p> <p><i>Geophysical survey, archaeological test excavation, where appropriate, which should be carried out by suitable qualified professionals (geophysicists and archaeologists),</i></p> <p><i>" Identification of potential direct and in-direct impacts of the proposed development on archaeological remains, "</i></p> <p><i>Identification of climate change vulnerability,</i></p> <p><i>" Mitigation measures to ameliorate any such impacts of the proposed development on the definition of the buffer area surrounding the monument which will preserve the setting and visual amenity of the site,</i></p> <p><i>"</i></p>

	<p><i>Provision of details on protection measures to be used on site.</i></p> <p>An Archaeological Impact Assessment (Geo Physical Report) has been provided in light of the subject area and the proposed siting for which has been prepared by ACSU. This was prepared following a desktop assessment by ACSU. The Council is referred to these reports for further details.</p>
14.20 Infrastructure and Utilities	
14.20.1 Water Services Infrastructure	<p><i>Outlined in Objective DMSO196 of the Development Plan, the Council seeks to: "Ensure that all new developments in areas served by a public foul sewerage network connect to the public sewerage system, to comply with the requirements of the Uisce Éireann Foul Sewer specification (where applicable)."</i></p> <p><i>Also, as per Objective DMSO197 of the Development Plan, the Council "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 and vice versa (prohibit foul to surface water) where separation systems are available."</i></p> <p>It is submitted that all details regarding above-mentioned Objectives can be found in the Engineering Pack prepared by Barrett Mahony Consulting Engineers (BMCE). This includes information on the foul water network, surface water network and water supply.</p>
14.20.3 Sustainable Urban Drainage Systems (SuDS)	<p><i>Outlined in Objective DMSO205 of the Development Plan, the Council "Require the preparation of a Surface Water Management Plan as part of all new developments which shall include the following:</i></p> <ul style="list-style-type: none"> <i>- 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).</i> <i>- 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."</i> <p>It is intended to utilise SuDS within the proposed scheme, and this has been fully addressed within the provided geotechnical Report (to assess sustainability of ground/soil/bearing capacity/groundwater etc) and that of the engineering drawings, all prepared by Barrett Mahony Consulting Engineers (BMCE). It is respectfully requested that the Planning Authority review this information.</p>
14.20. 6 Flood Risk Management	<p><i>Outlined in Objective DMSO212 of the Development Plan, the Council seeks to: 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 be considered for all new developments within the County. All developments must prepare a</i></p>

		<p><i>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."</i></p> <p>A Site-Specific Flood Risk Assessment, prepared by Barrett Mahony Consulting Engineers is provided with this LRD application submission for which it is respectfully requested to be reviewed, for which illustrates adherence. The Planning Authority are respectfully requested to ref to this document.</p>
14.20.12	Waste Management	<p><i>The following provides an overview of the most relevant Objectives of the Development Plan in relation to the proposed development.</i></p> <p><i>Objective DMSO236: "Ensure all new large-scale residential and mixed-use developments include appropriate facilities for source segregation and collection of waste."</i></p> <p><i>Objective DMSO237: "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 adequate screened alcoves or other such mitigation measures are provided."</i></p> <p><i>Objective DMSO238: "Ensure the maximum distance between the front door to a communal bin area does not exceed 50 metres."</i></p> <p>It is submitted that the proposed scheme has been made cognisant of the aforesaid Objectives of the Development Plan. Relevant details can be found within the provided Operational Waster Management Plan prepared by Wave Dynamics, which we respectfully invite the Council to refer to.</p>
14.20.14	Construction and Demolition Waste Management Plans	<p>According to Objective DMSO241 of the Development Plan, the Council <i>"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:</i></p> <ul style="list-style-type: none"> - <i>New residential development of 10 units or more.</i> - <i>New developments other than above, including institutional, educational, health and other public facilities, with an aggregate floor area in excess of 1,250sqm.</i> - <i>Demolition/renovation/refurbishment projects generating in excess of 100m3 in volume of C&D waste.</i> - <i>Civil engineering projects in excess of 500m3 of waste materials used for development of works on the site."</i> <p>In response to this, and as previously noted, demolition works were not required for the proposal, notwithstanding a Construction, Environmental Management Plan has been prepared by Barrett Mahony Consulting Engineers (BMCE) and submitted as part of this LRD application, which the Planning Authority is respectfully invited to review.</p>

14.20.15 Construction Noise	<p>According to Objective DMSO243 of the Development Plan, “Where development sites adjoin residential properties, the Planning Authority shall restrict the operation of equipment or machinery (to include pneumatic drills, construction vehicles, generators, etc.) on or adjacent to the site before 07.00 hours on weekdays and 09.00 hours on Saturdays, after 19.00 hours on weekdays and 13.00 hours on Saturdays and at any time on Sundays, Bank Holidays or Public Holiday.”</p> <p>In response to this, and as previously noted, demolition works were not required for the proposal, notwithstanding a Construction, Environmental Management Plan has been prepared by Barrett Mahony Consulting Engineers (BMCE) and submitted as part of this LRD application, which the Planning Authority is respectfully invited to review.</p>
14.21 Climate Action	
14.21.3 Climate Action Energy Statement	<p>According to Objective DMSO261 of the Development Plan, the Council seeks, “All new developments involving 15 residential units and/or more than 1,000 sqm 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.”</p> <p>The Planning Authority are respectfully directed to refer to the enclosed Climate and Energy Report prepared by Fallon Design and submitted under separate cover as part of this LRD application.</p>

4.0 CONCLUSION

DOWNEY, Chartered Town Planners, 29 Merrion Square, Dublin 2, D02 RW64, have prepared this Planning Statement and Statement of Consistency with Planning Policy on behalf of our client and the applicant, Golden Port Homes Limited, to accompany a proposed Large-Scale Residential Development (LRD) on lands at Forest Road, Swords, Co. Dublin.

The proposed development subject to this LRD application provides for a scheme of 109 no. homes in the form of houses, duplex units and apartments, along with open space, new roads and footpaths and all associated infrastructure required to facilitate the development.

The design of the proposed scheme has been the subject of a full analysis/feasibility study of the proposed site and its surrounding landscape, and it is considered that the proposed development represents a high-quality design whilst optimising the appropriate use of the site. The proposed development is also informed by two Section 247 pre-application meetings with the Local Authority in addition to offline meetings with relevant departments of the Council, along with a Stage 2 LRD Pre-Planning Meeting, with an opinion letter provided by Fingal County Council. DOWNEY have prepared a Statement of Response to this opinion letter which is submitted under separate cover and ensures that the subject proposal now being submitted has followed the guidance of the local authority.

The proposed development will provide for a sustainable residential development on appropriately zoned lands, in an accessible location within the development boundaries of Swords which would promote compact urban growth and a good quality of life. This in turn will further support compact growth of the town itself and assist in meeting the increasing demand for residential accommodation in Swords and the overall County.

The proposed development comprises a high-quality scheme of an appropriate scale and of a sustainable residential density reflective of the Fingal County Development Plan 2023-2029, as well as being aligned with the national, regional, and local policy guidance. The Statement of Consistency embedded in this Statement demonstrates that the proposed development complies with the relevant planning policy and guidance in the foregoing levels. Furthermore, the proposal will provide for an effective, efficient, sustainable use of what is a greenfield site in an accessible location.

The proposed dwelling houses, duplex units and apartment units meet the requirements of Fingal County Council and fully comply with the Fingal Development Plan 2023-2029, the '*Sustainable Residential Development and Compact Settlements*' Guidelines, and the '*Sustainable Urban Housing: Design Standards for New Apartments*' Guidelines. All unit types proposed meet the minimum gross floor areas required and meet the aggregate living room, living areas, bedroom areas and storage areas required. Please refer to the accompanying drawings and Schedule of Accommodation enclosed with this planning application for a full breakdown of living standards for each unit type, prepared by Crawford Architecture. Notably, the delivery of 109 no. residential units at this location will add to the sense of community in the area, would represent an appropriate and sustainable land use, and would provide for an appropriate use on an otherwise underutilised site. Please also refer to the Urban Design Statement prepared by Crawford Architecture which demonstrates the proposed development's compliance with the relevant planning policy and guidelines.

In light of the above, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area in which it is located as expressed in national, regional and local planning policy and Guidelines issued under Section 28 of the Planning and Development, 2000 (as amended), and as such, it is considered that the proposed development represents a high-quality residential development. DOWNEY trust that the enclosed plans and particulars pertaining to this application are in order and look forward to a favourable decision from Fingal County Council in due course.

APPENDICES – PRE-PLANNING MINUTES



RECORD OF SECTION 247 – Pre-Planning MEETING

Pre Application Reference Number	FPP000396		
Meeting Type	Section 247 Pre-Planning Meeting		
Date	29.02.2024	Start Time	12:00pm
Location		End Time	12:45pm
Chairperson	Andrew Davidson		

In accordance with Section 247(3) of the Planning and Development Act 2000, as amended, the carrying out of pre planning consultations shall not prejudice the performance by a planning authority of any other of its functions under the Act, or any regulations made under the Act and cannot be relied upon in the formal planning process or in legal proceedings.

Proposed Development:

Residential development comprising terraced houses, semi-detached houses, duplexes and 4 storey apartment building, accessed via new link road as per development plan, together with all site development and servicing works, bin stores, bike stores, ESB substation (if required), open space, landscaping and boundary treatments.

Zonings	Objective Type GB Green Belt Objective Description Protect and provide for a Greenbelt Objective Type RS Residential Objective Description Provide for residential development and protect and improve residential amenity
Airport Zone	Objective DAO11 – Requirement for Noise Insulation Zone C
Relevant Objectives and Policies	LAP 8.B
Road Infrastructure	Road proposal on development plan maps located south of proposal (review of the South Fingal Transport Study, 2019 necessary).
National Monument	SMRS DU011-119----

	<p>WEB_NOTES A circular ring-ditch visible as a crop mark on an aerial photograph (SMR file; pers. comm. T. Condit). The site is located in a relatively low lying field within a gently undulating landscape. No visible remains at ground level. Compiled by: David O'C</p> <p>CLASS_CODE RGDH</p> <p>TOWNLAND FORREST GREAT</p> <p>Ensure no impact on National Monument would arise/Impact form road proposal</p>
Conservation/Archaeology	Historic Landscape Character Boundary of Swords
Planning Feedback	<ul style="list-style-type: none"> • Principle of development acceptable on RS zoned lands; • Density can be increased on site and inclusion of apartments would be welcomed if designed appropriately in the context of the proposal; • No acceptable Open Space serving the subject site should be placed on the other side of the indicated distributor road; • Proposed housing should be facing and addressing Forest Road to create a strong road frontage; • Proposed open space should be better distributed through the site and main open space should be more central to provide ease of access to all residents; • Connectivity with site to the north is welcomed however, open space should be designed that it is not only a walkway and that it remains useable; • Proposed child play to be included.
Landscaping & Tree Retention	<ul style="list-style-type: none"> • Retaining hedgerows where possible and reinstating the equivalent or more to what might be lost; • Tree Survey to be provided and potential bat survey; • Ensuring adequate screening, tree plantings provided; • Landscape Masterplan to be provided and tree survey if necessary.

Transportation	<p><i>Bicycle Parking</i> Bicycle parking should be provided as per the standards of the Fingal Development Plan 2023-2029 for staff and visitors.</p> <p><i>Car Parking</i> Car Parking should be provided as per the standards of the Fingal Development Plan 2023-2029 for staff and visitors.</p> <p>Consider engaging with Transportation Section to ensure access onto Forest Road can be facilitated with the provision of adequate footpath and cycling infrastructure to connect the proposed scheme.</p>
Water Services	SuDs proposal to be included.
EIA and AA Screening reports	<p>The Applicant should provide AA and EIA Screening Reports</p> <p>DMS01 and DMS02</p>

Please liaise with the following for further details with regards to:

Transportation Section – Colm Campbell Colm.Campbell@fingal.ie

Parks & Green Infrastructure - Gemma Carr Gemma.ECarr@fingal.ie

Water Services Section - David Devine David.Devine@fingal.ie

Meeting Notes – 8th October 2024



LRD0057/S1

Subject	LRD0057/S1		
Meeting Place	Microsoft Teams		
Date	8 th October 2024		
Time		Start: 14.30p.m.	Finish: 16.00p.m.
Attendees:	Internal	External	
	Jennifer Casserly (FCC)	Annabel Gilmartin	
	Laura Barton (FCC)	David Barrett	
	Solomon Aroboto (FCC)	Declan Foley	
	Gemma Carr (FCC)	Ronan Mac Diarmada	
	Marta Durek (FCC)	Hannah Byrne	
	Shane Comaskey (FCC)	Conor Vaughan	
	Phillip Grobler (FCC)	Donal Duffy	
	Hannah Millar (FCC)	Hannah Byrne	
	Finbarr Quigley (FCC)	Dan Ryan	
	Ellen Giffney (FCC)		
	Jessica Clarke (FCC)		
	Shauna Hughes (FCC)		
	Karen Leeson (FCC)		

	Disclaimer Please Note that advice, feedback and opinion offered at consultation is given in good faith and cannot prejudice the determination of a subsequent planning application in accordance with Section 247 of the Planning and Development Act 2000, as amended
Item	Opening
	Presentation of development given:
	Development Description <p>The proposed Large-Scale Residential Development (LRD) provide 105 no. residential units, comprising 33 no. houses of (5 no. 2 bed, 14 no. 3 bed, and 14 no. 4 bed units) in a mix of semi-detached and terraced units; 34 no. Duplex units (17 no. 1 bed and 17 no. 3 bed units); and 38 no. apartments between 2 no. 5 storey apartment blocks (Block A consisting of 5 no. 1 bed and 14 no. 3 bed units and Block B consisting of 5 no. 1 bed and 14 no. 3 bed units). The proposed development will also consist of an ESB substation; public lighting; landscaping, including a new berm to the south, open space and boundary treatment; drainage and engineering works; surface car parking and bicycle parking; along with all associated site development works necessary to facilitate the development. Forest Road, Swords.</p>

Meeting Notes – 8th October 2024



LRD0057/S1

Item	Part V
	<ul style="list-style-type: none"> - Advised the LRD that Part V is applicable at 20% under the affordable housing act 2021. The developer will have to email PartV@Fingal.ie directly to engage into a PartV agreement. - Housing Department would want the units delivered upfront, mix of apartments and houses, Units to be pepper potted around the development. - Relevant Contract Tax 'RCT' applies to payments made by Fingal County Council. - PartV are open to meeting closer to proposal to discuss the costings, site layout plan, drawings, and schedule of accommodation. All of which need to be sent across to the PartV section. <p>PartV@fingal.ie</p>
Item	Transport
	<ul style="list-style-type: none"> • A detailed sightline drawing is required, if removal of hedging is required it should be clearly demonstrated on the drawing. The Transportation Planning Section can provide the exact requirements for sightlines in this type of area if necessary. • In regard to the general layout, the Transportation Planning Section recommends the applicant give further consideration to the following items: <ul style="list-style-type: none"> ○ The 'southern access road' is quite long and straight, and further consideration should be given to how this layout reduces traffic speeds and complies with DMURS guidance. ○ The concept of the pedestrian connectivity running east-west along the northern side of the site is welcome by the Transportation Planning Section, however we would have a preference that it is a shared cycle pedestrian path if appropriate, and that it is uninterrupted/continuous, and that it is lit by public lighting if appropriate. ○ Consideration should be given to the surface treatment in any proposed homezones/shared surfaces, DMURS gives clear guidance as follows: DMURS States (Section 4.3.4) The key condition for the design of any shared surface is that drivers, upon entering the street, recognise that they are in a shared space and react by driving very slowly (i.e. 20km/h or less). To ensure this, designers should: <ul style="list-style-type: none"> • Use a variety of materials and finishes that indicate that the carriageway is an extension of the pedestrian domain (such as paving: see Section 4.2.6 – Materials and Finishes). The Transportation Planning Section has a preference for 'red coloured Stone Mastic Asphalt' in homezones/shared surfaces. DMURS gives guidance that the main surface should be no wider than 4.8m. Consideration should be given to the entry treatment to a homezone/shared surface; potentially continuing the concrete footpath across the entry to the homezone is a potential option, or a change in level etc., DMURS gives further guidance on this.

Meeting Notes – 8th October 2024



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- Full detailed Roads/Engineering Drawings should be provided; including
 - Details of drainage.
 - Details of levels of roads, kerbs and footpaths.
 - Details of road markings, signage tactile paving.
 - Details of road surface materials.
- A statement of consistency with DMURS should be provided.
- A Stage 1 Road Safety Audit should be carried out and provided.
- A rationale for the carparking proposals should be provided, with regard to the 'Sustainable Residential Development and Compact Settlement Guidelines for Local Authorities' and the Fingal Development Plan Standards. The proposed development is located in 'zone 1'. A dedicated carparking drawing should be provided.
- EV charging should be provided as per the standards of the Fingal Development Plan. The Transportation Planning Section considers that 20% of non-assigned/non-in-curtilage residential carparking spaces should have EV charging facilities.
- Bicycle Park for any unit that does not have direct access to a rear garden must comply with the requirements of the Fingal Development Plan and the 'Sustainable Residential Development and Compact Settlement Guidelines for Local Authorities'.
- The proposed detail for the bicycle parking should make allowance for a variety of bike types and bike users (such as cargo bikes) and the applicant should take guidance from the Chapter 2.3 and Chapter 6 of the Cycle Design Manual published by the NTA.
- The proposed detail of the bicycle parking should comply with the following section of the Fingal Development Plan:

14.17.2.1 Bicycle Parking and Residential Development:
 - The quality and quantity of bicycle parking provision in residential developments should encourage residents to adopt cycling as the preferred mode of travel for short trips.
 - Cycle parking should be provided within the curtilage or adjacent to the building and should not require the bike to be brought through an internal area.
 - Innovative, secure, covered and front of house bicycle parking solutions are required in the design of all new duplex developments and terrace dwellings. Wall bars or rings are not acceptable at the front of a house for long stay bicycle parking. Applications for front of house bicycle parking solutions in existing housing and residential areas and matching these criteria will be supported and encouraged.

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- In exceptional circumstances, where cycle parking cannot be provided within the curtilage, bicycle parking that is innovative in design, secure and sheltered must be provided adjacent to the building. Communal on-street bicycle parking provision provides an opportunity in the context of retrofitting existing terrace dwellings fronting onto streets in existing built-up area and this will form part of the Active Travel Strategy.
- Apartment development must be comprehensively equipped with high quality cycle parking and storage facilities for residents and visitors.
- The provision of high-quality bicycle parking is a key concern for apartment residents and apartment proposals must respond accordingly in their design and provision of such facilities.
- Each apartment unit shall be provided with an individual storage compartment for long-stay bicycle provision that is capable of accommodating bicycles, buggies and additional ancillary equipment such as scooters, helmets and bicycle maintenance equipment.
- Guidance in relation to bicycle parking provision and storage for apartment developments is outlined in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020. The Council will have regard to these relevant guidelines when considering applications for apartment development where bicycle parking is a requirement
- Section 14.17.2 of the Fingal Development Plan 2023-2029 describes 'long-stay' bicycle parking in the following terms: These are to be designed for private use by residents and employees. Such cycle parking spaces should be located in a secure area that is easy to access, well-lit and covered. Effective security and functionality for all types of users is also maximised by the provision of individual facilities to allow for different types of equipment such as buggies, cargo bikes, helmets and scooters to be stored where appropriate. They should be situated within the curtilage of the destination.
- Section 14.17.2 of the Fingal Development plan 2023-2029 describes 'short-stay' bicycle parking in the following terms: These are designed for ease of use by the general public and visitors to a development. Such bicycle parking spaces should be located in highly visible areas with good passive surveillance, which are easy to access and well lit. They should ideally be situated no further than 15m from main entry points
- The Transportation Planning Section are available to discuss/clarify technical engineering details, such as the sightline requirements and the required kerb and footpath details along the existing public road etc.
- In regard to any Taking in-charge proposals, the applicant is advised to further consider the following points:

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- The Councils Taking in Charge Policy/Specification Appendix 6 Section 8 states the following: " All roads to be taken in charge will be taken in charge at a minimum from the back of footpath/cyclepath on one side of the road to the back of footpath/cyclepath on the other side of the road in line with the definition of a road in the 1993 Roads Act Part 1 Section 2(1).
- The consequence of the above point, is that the Councils taking in charge policy, by default, requires all 'non in-curtilage carparking/on-street car parking spaces' located on or directly adjacent to streets/roads proposed to be taken in charge by the Council to not be designated to any particular unit and to become public carparking spaces by default, unless otherwise agreed with the Councils taking-in-charge section.
- All areas that are proposed to be 'taken in charge' by the Council, should be constructed and maintained to the Councils standards for taking in charge, including roads, footpaths, verges, public lighting, open space, sewers, watermains or drains, forming part of the development.
- Public infrastructure such as stormwater drainage and streetlighting, should be located in areas to be taken-in-charge by the Council.
- The applicant is advised to engage with the Councils Taking in Charge Section for any discussion required on the Councils taking in charge requirements, who can be reached at ticestates@fingal.ie

Item Water & Drainage

High level S1 meeting with engineering strategy presented; 3 catchments, including basin on POS and 2 x tanks serving apartment blocks, green/blue roofs on 2 x apartments, permeable paving in-curtilage, etc

- No flood risk as per SFRA but commensurate SSFRA required
- Noted intention to discharge to existing SW within Forest Rd - this sewer does not appear on GIS but is stated to be confirmed with GPR survey and FCC drainage inspector.
- SW strategy acceptable but need to be further developed.
- PCE send in to IW 8 weeks ago, no reply yet.
- Intention to connect to Ridgewood networks to the north , crucial that possibility of gravity foul connection be confirmed as PS will have buffer requirement

Item Parks & Landscaping

Existing trees and vegetation:
The following information is required to fully assess this proposal:
 Arboricultural Impact Statement
 Tree Protection Plan
 The red line boundary line to be shown on the Tree Survey.
 Clearly show that there is no net canopy loss in relation to the proposed development.

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Public Open Space:

Overall Public Open Space requirement is 6,100sq m.

The On-site Public Open Space provision is not accordance with Development Plan standards.

It should be noted that the linear open space to the north is not considered Public Open Space in accordance with the Development Plan. It is considered Environmental Open Space in its present narrow width.

The area which is considered Public Open Space is that which the playground is proposed.

Transition between Greenbelt and RS zoning – consider tree and hedgerow planting along this southern boundary.

Play provision requirement:

416 sq m

A minimum of 25m separation distance is required between residential units and the proposed play facility.

Play provision shall not be located in SuDS areas.

Street tree plan

Street tree plan is required. Lamp standards and location of constructed tree pits to be clearly shown (7m separation distance between lamp standards and trees).

Street trees to be included in particular in the western portion of the site.

Landscape plan:

The tree/hedgerow footprint (as shown on the Tree Survey) to be clearly shown on the landscape plan.

Any SuDS features (as shown on the drainage drawings) to be clearly shown on the landscape plan. Slopes 1:5.

Cross sections between the public open space areas to the north (to include houses, road and open space) and the proposed open space / tree /hedgerow area to the south to be provided.

Cross sections to the western, eastern and southern boundaries also to be provided.

Passive Overlooking of green areas

Passive supervision along the northern boundary is critical to design out anti-social behaviour.

Ensure that there are no buildings such as bin stores, ESB substations on open space areas (in order to avoid anti-social behaviour).

Taking in charge plan

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	<p>Areas to be taken in charge to be outlined using a thin line (as opposed to block colour) There should be no ambiguity of what is private / public either on a drawing or on the ground.</p>
Item	Noise
	<ul style="list-style-type: none"> • No technical report available to date. • The proposed development is situated in Zones B and C of the Dublin Airport Noise Zones as described in the Fingal County Development Plan 2023-2029, so the rules applying to Zone B should be applied across the entire site. • The existing noise environment in the location of the proposed development will make it very challenging to provide residential properties which offer the necessary protection to over-exposure to high levels of noise, particularly at night with windows open. • The existing noise environment will make it particularly challenging to provide quality outdoor amenity areas which do not expose residents to high levels of noise. • It was noted that Wave Dynamics (Acoustics Consultants) have been commissioned to carry out an Inward Noise Assessment which will investigate the suitability of the site for residential development in terms of noise exposure. • The letter from Wave Dynamics referred to the investigation of the impacts of installing a berm along the southern boundary of the site which could act as a barrier to ground noise from Dublin Airport. There was no mention of this berm in any of the other documents already submitted or discussed and the proposal of a berm is concerning.
Item	Planning / Opinion Issues
	<ul style="list-style-type: none"> • Site is zoned RS- Residential and adjoining land is GB- Green Belt zoning and therefore Objective in Development Plan related to Transitional Zone is applicable, whereby the proposal should avoid abrupt transitions in scale and use and to protect amenities of area. Preserving of GB land is critical, and the proposal will need to take cognisance of same. • Proposal of apartments and increased height at road edge is concerning given the rural nature of the road and land to the south. • Onus on applicant that density complies with Settlement Strategy (FDP) and applicable standards of Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities. • Given site is within Noise Zone B and C of Dublin Airport, following of Development Plan is relevant;

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-Policy DAP5, DAP6, Objective DA011, Section 14.16.1 Housing within Airport Noise Zones.

-Objective DA024- Housing Development and Dublin Airport Zones.

Amenity for residents both indoor and outdoor is of concern with distance from airport and noise zones.

- Townland boundary to be retained and additional trees should be considered along the southern boundary.
- In relation to Public Lighting, no information has been provided and a taking in charge map is required. Concern re public lighting and attenuation tanks, bat protection and light pollution.
- Connectivity through the site important.
- Schedule of Accommodation/Floor Areas to be provided.
- Daylight sunlight assessment and shadow analysis may be required.
- DMS037 objective - age friendly requirement on the units.
- DMS0194 objective - Public art requirement on developments over 100 units.
- EIAR/NIS requirements to be fulfilled.
- Social Infrastructure audit
- Energy statement
- Provision of Childcare facility important

Comments

END Meeting concluded 16.00p.m.

Large Scale Residential Development Opinion
Section 32D of the Planning and Development Act 2000 (as amended)

Applicant: Goldenport Estates Ltd.

Development Location: Lands to the west of Forest Road at Forrest Great, directly south of Ridgewood Green, Swords, Dublin.

FCC Reference: LRD0057/S2

Request for LRD Meeting: 25th November 2024

Date of LRD Meeting: 18th December 2024

1. Introduction

Having regard to the LRD meeting that has taken place in relation to the proposed development, the purpose of this report is to form a recommended LRD opinion as to whether or not the documents submitted for the purposes of the meeting constitute a reasonable basis on which to make a formal LRD planning application in accordance with Section 32D of the Planning and Development Act 2000, as amended.

This report may also specify (a) the areas, or the issues, in respect of which the documents submitted do not constitute a reasonable basis on which to make the application, and (b) any issues that, if addressed by the relevant documents, could result in the documents constituting a reasonable basis on which to make the application.

2.0 Site Location and Description

The subject site is located is a greenfield site, measuring c. 2.14 hectares, at Forest Road, Swords, Co Dublin, and within the administrative area of Fingal County Council. This subject site is situated 2.1km southwest of Swords Town Centre, 1.5km southwest of the Airside Retail Park, and 11km north of Dublin City Centre. There is one existing access point to the site with this being onto Forest Road from the site's eastern boundary.

The subject site is bound to the north by Ridgewood Green, to the immediate east by Forest Road and Forest Little Golf Club, to the immediate South by a detached residential dwelling, to the east/southeast by several greenfield sites.

3.0 Proposed Large Scale Residential Development

The development includes for:

A total of 104 no. residential units (42 no. duplex units; 36 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 and private open space;
- (ii) 36 no. apartments within 2 blocks. Block A will be a 5 storey building with 18 no. apartments (5 no. 1 bed and 13 no. 2 bed units) with balconies/terraces to the north, east, south and west elevations, and bin, bicycle parking and plant at ground floor level and plant at roof level; Block B will be a 5 storey building with 18 no. apartments (5 no. 1 bed and 13 no. 2 bed units) with balconies/terraces to the east and west elevations and bin, bicycle parking and plant at ground floor level and plant at roof level;
- (iii) 26 no. houses (comprising 5 no. 2 bed, 2 storey houses; 10 no. 3 bed, 2 storey houses; 11 no. 4 bed, 3 storey houses) in a mix of detached and semi-detached house types;
- (iv) Surface car parking as well as bike parking stores and bin stores;
- (v) 1 no. ESB substation;
- (vi) Landscaping, new footpath and cycle path to Forest Road,

boundary treatment and all associated site works necessary to facilitate the proposed development.

Site Area	Residentially zoned area of 2.14ha to be developed
Units	104
Dual Aspect Apartments	50%
Houses and duplexes	100%
Density	50 units/hectare
Car Parking spaces	0.96 spaces/unit
Bicycle Parking spaces	2.11 spaces/unit
Total Private Amenity Space	3133.5 sq. m.
Total Communal Amenity Space	1,181 sq. m.
Public Open Space	2683 sq. m. (13%)

4.0 Planning History

Reg. Ref. F06A/0496. ABP Ref. PL06.218399 –

By Order dated 8th May 2007 An Bord Pleanála refused planning permission to Gerard Gannon for the development consisting of

1. 10 no. two storey plus attic four-bedroom terraced dwellings with dormer window to the front and surface parking to the front.
2. 16 no. three storey duplex type units with first floor balconies each containing 1 one-bedroom apartment and 1 three-bedroom apartment with associated surface parking (a total of 32 dwelling units).
3. 1 no. three storey plus penthouse apartment block with balconies on all levels containing a total of 15 no. two bedroom apartments, 13 no. three bedroom apartments and 2 no. four bedroom apartments with associated surface parking (a total of 30 dwelling units).
4. 1 no. three storey plus penthouse apartment block with balconies on all levels containing a total of 14 two-bedroom apartments and 4 three-bedroom apartments with associated surface parking (a total of 18 dwelling units).
5. 1 no. six storey plus penthouse apartment block with balconies on all levels containing one 165 sq.m. crèche at ground floor level, 5 no. one bedroom apartments, 6 no. two bedroom apartments and 6 no. three bedroom apartments (a total of 17 dwelling units).
6. New vehicular access onto Forest Road.
7. New 1800mm high wall along western boundary of site.
8. New stone wall along eastern boundary of site (along Forest Road).
9. Associated site works, bin stores and bicycle storage.

Reason for Refusal

Fingal County Council determined that the proposal materially contravened the development plan zoning objective RS1 which reads *'To provide for new residential communities in accordance with approved Local Area Plans and subject to the provision of the necessary social and physical infrastructure'*. This is because the majority of land proposed for residential development in the application was not designated for development in the Action Area Plan for Rathingle. A grant of permission in this case

would therefore set an undesirable precedent for unplanned development, and this would be contrary to the proper planning and sustainable development of the area.

There have been no subsequent applications recorded on site following this application.

The requirement for a LAP has been removed from the current Development Plan.

5.0 Relevant Planning Policy

5.1 National Policy

Project Ireland 2040 – National Planning Framework

The National Planning Framework is a high-level strategic plan shaping the future growth and development of Ireland to 2040. The NPF includes 75 no. National Policy Objectives. These include inter alia Objective 13 which seeks in urban areas that 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. Objective 27 seeks to ensure the integration of safe and convenient alternatives to the car in the design of communities, Objective 33 seeks to prioritise new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location and Objective 35 seeks to increase residential density in settlements via a range of measure including infill development schemes or site based regeneration and increased building height.

Section 28 Ministerial Guidelines and other National Policy

Having considered the nature of the proposal and the receiving environment, the relevant S.28 Ministerial Guidelines and documents include:

- Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities, (2024).
- Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (including the associated Urban Design Manual) (2009).
- Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities (2023).
- Urban Development and Building Heights: Guidelines for Planning Authorities (2018).
- Design Manual for Urban Roads and Streets (DMURS) (2013).
- The Planning System and Flood Risk Management (including the associated Technical Appendices).
- Childcare Facilities – Guidelines for Planning Authorities (2001).
- Guidelines for Local Authority Climate Action Plans, 2023.
- Appropriate Assessment Guidelines (2009).
- Environmental Impact Assessment Guidelines (2018).
- Design Manual for Quality Housing (2021).
- Regulation of Commercial Institutional Investment in Housing (2023).
- Circular Letter NRUP 02/2021 relating to residential densities in towns and villages as set out in the Guidelines for Planning Authorities on ‘Sustainable Residential Development in Urban Areas’.

5.2 Regional Policy

Eastern and Midland Regional Assembly - Regional Spatial and Economic Strategy 2019-2031 (EMRA-RSES)

The RSES provides a development framework for the region through the provision of a Spatial Strategy, Economic Strategy, Metropolitan Area Strategic Plan (MASP), Investment Framework and Climate Action Strategy. The Dublin MASP is an integrated land use and transportation strategy for the Dublin Metropolitan Area, which seeks to manage the sustainable and compact growth of the Dublin Metropolitan Area.

The strategy for the sequential development of the metropolitan area is focussed on the achievement of ambitious compact development targets of at least 50% of all new homes in Dublin within or contiguous to the existing built up area. The MASP identifies strategic residential, employment and regeneration development opportunities on the corridors along with the requisite infrastructure investment needed to ensure a steady supply of sites in tandem with the delivery of key public transport projects as set out in the NDP.

- RPO 5.3: Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.
- RPO 5.4: Future development of strategic residential development areas within the Dublin Metropolitan Area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing: Design Standards for New Apartments' Guidelines and 'Urban Development and Building Heights Guidelines for Planning Authorities.
- RPO 5.5: Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.

5.3 Local Policy

Fingal Development Plan 2023-2029

The site is located within the development boundary of Swords and is governed by the policies and objectives of the Fingal Development Plan 2023-2029.

Core Strategy and Settlement Hierarchy

Swords is identified as a 'Key Town' within the Metropolitan Area. The core strategy of the Development Plan outlines the overall hierarchy for the county with the intention that "each identified settlement centre will accommodate an agreed quantum of future development appropriate to its respective position in the hierarchy"

Policy CSP1 – Core Strategy

Promote and facilitate housing and population growth in accordance with the overarching Core Strategy to meet the needs of current and future citizens of Fingal.

Policy CSP2 – Compact Growth and Regeneration

Support the implementation of and promote development consistent with the National Strategic Outcome of Compact Growth as outlined in the NPF and the Regional Strategic Outcome of Compact Growth and Regeneration as set out in the RSES.

Policy CSP3 – Strategic Development Areas and Corridors

Support the economic development of Fingal in line with the policies and objectives stipulated in the National Planning Framework and the Regional Spatial and Economic Strategy and utilise active land measures such as provision of LAPs and masterplans across the County as part of the development approach for Strategic Development Areas and Corridors.

Objective CSO1 – Sufficient Zoned Land

Ensure that sufficient zoned land is available to satisfy the housing and population requirements of the County, as set out under the Ministerial Guidelines for Housing Supply and the Regional Spatial and Economic Strategy, over the lifetime of the Plan.

Objective SPQHO1 - Sustainable Communities

Ensure that proposed residential development contributes to the creation of sustainable communities and accords with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG 2009 (and any superseding document) and companion Urban Design Manual – A Best Practice Guide, DEHLG 2009 and the Design Manual for Urban Roads and Streets (DMURS) (as revised).

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.

Objective SPQHO9 – Consolidated Residential Development

Consolidate within the existing urban footprint, by ensuring of 50% of all new homes within or contiguous to the built-up area of Dublin City and Suburbs and 30% of all new homes are targeted within the existing built-up areas to achieve compact growth of urban settlements, as advocated by the RSES

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 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.

Objective DMS0105– *Development within Airport Noise Zones*

Strictly control inappropriate development and require noise insulation where appropriate in accordance with Table 14.16 above within Noise Zone B and Noise Zone C and where necessary in Assessment Zone D, and actively resist new provision for residential development and other noise sensitive uses within Noise Zone A, as shown on the Development Plan maps, while recognising the housing needs of established families farming in the zone. To accept that time based operational restrictions on usage of a second runway are not unreasonable to minimize the adverse impact of noise on existing housing within the inner and outer noise zone

Objective DAO11 – Requirement for Noise Insulation

Strictly control inappropriate development and require noise insulation where appropriate in accordance with Table 8.1 above within Noise Zone B and Noise Zone C and where necessary in Assessment Zone D, and actively resist new provision for residential development and other noise sensitive uses within Noise Zone A, as shown on the Development Plan maps, while recognising the housing needs of established families farming in the zone. To accept that time based operational restrictions on usage of the runways are not unreasonable to minimise the adverse impact of noise

on existing housing within the inner and outer noise zone.

Objective DAO24 – Housing Development and Dublin Airport Noise Zones

Restrict housing development in order to minimise the potential for future conflict between Airport operations and the environmental conditions for residents, in accordance with the Dublin Airport Noise Zones 2019.

14.16.1 Airport Noise

Table 14.16 presents the four aircraft noise zones and the associated objective of each zone along with an indication of the potential noise exposure from operations at Dublin Airport. The zones are based on potential noise exposure levels due to the Airport using either the new northern or existing southern runway for arrivals or departures.

Noise Zone B; To manage noise sensitive development in areas where aircraft noise may give rise to annoyance and sleep disturbance, and to ensure noise insulation is incorporated within the development. Noise sensitive development in this zone is less suitable from a noise perspective than in Zone C. A noise assessment must be undertaken in order to demonstrate good acoustic design has been followed. Appropriate well-designed noise insulation measures must be incorporated into the development in order to meet relevant internal noise guidelines. An external amenity area noise assessment must be undertaken where external amenity space is intrinsic to the development's design. This assessment should make specific consideration of the acoustic environment within those spaces as required so that they can be enjoyed as intended. Ideally, noise levels in external amenity spaces should be designed to achieve the lowest practicable noise levels. Applicants must seek expert advice.

Noise Zone C; To manage noise sensitive development in areas where aircraft noise may give rise to annoyance and sleep disturbance, and to ensure noise insulation is incorporated within the development. Noise sensitive development in this zone is less suitable from a noise perspective than in Zone C. A noise assessment must be undertaken in order to demonstrate good acoustic design has been followed. Appropriate well-designed noise insulation measures must be incorporated into the development in order to meet relevant internal noise guidelines. An external amenity area noise assessment must be undertaken where external amenity space is intrinsic to the developments design. This assessment should make specific consideration of the acoustic environment within those spaces as required so that they can be enjoyed as intended. Ideally, noise levels in external amenity spaces should be designed to achieve the lowest practicable noise levels. Applicants must seek expert advice.

Objective GINHO43 – Streamside Riparian Zone

Remove existing revetments and/or gabion baskets along river and streams and restore a minimum of 10m of natural streamside riparian zone, where possible. If existing hard bank structures cannot be removed, provide instream river rehabilitation works in consultation with Inland Fisheries Ireland to improve the overall habitat quality of the river.

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 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 DMSO17 – Location of New Utility Structures

Where possible, new utility structures such as electricity substations and telecommunication equipment cabinets should not be located adjacent or forward of the front building line of buildings or on areas of open space.

Zoning and Site-Specific Objectives

The subject site is zoned RS, 'Residential', the objective of which seeks to *“Provide for residential development and protect and improve residential amenity”*

The vision of this Objective is to: “Ensure that any new development in existing areas would have a minimal impact on and enhance existing residential amenity”.

The southern lands adjoining the site which are within the blue land ownership line are zoned GB-Greenbelt which seeks to 'Protect and provide for a Greenbelt'.

The Vision of this BG objective is to “Create a rural/urban Greenbelt zone that permanently demarcates the boundary (i) between the rural and urban areas, or (ii) between urban and urban areas. **The role of the Greenbelt is to check unrestricted sprawl of urban areas, to prevent coalescence of settlements, to prevent countryside encroachment and to protect the setting of towns and/or villages.** The Greenbelt is attractive and multifunctional, serves the needs of both the urban and rural communities, and strengthens the links between urban and rural areas in a sustainable manner. **The Greenbelt will provide opportunities for countryside access and for recreation,** retain attractive landscapes, **improve derelict land within and around towns,** secure lands with a nature conservation interest, and retain land in agricultural use. The zoning objective will have the consequence of achieving the regeneration of undeveloped town areas by ensuring that urban development is directed towards these areas.”

Objective ZO2 – Transitional Zonal Areas

Have regard to development in adjoining zones, in particular, more environmentally sensitive zones, in assessing development proposals for lands in the vicinity of zoning boundaries.

The Development Plan maps show the boundaries between zones. While the zoning objectives and control standards indicate the different uses permitted in each zone, it is important to avoid abrupt transitions in scale and use in the boundary areas of adjoining land use zones. In dealing with development proposals in these contiguous transitional zonal areas, it is necessary to avoid developments that would be detrimental to the amenities of the more environmentally sensitive zone. For instance, in zones abutting residential areas or abutting residential development within predominantly mixed-use zones, particular attention must be paid to the use, scale and density of development proposals in order to protect the amenities of residential property.

Landscape Character – Low lying agriculture.

The application site is divided within Noise Zones associated with Dublin Airport, with the western section in Zone C and the eastern section within Zone B.

The northern boundary is bound by a historic townland boundary hedgerow and the southern boundary by an inductive road proposal objective.

6.0 Consultation

6.1 S247 Consultation

A Section 247 meeting took place between the applicant and the Planning Authority on 8th October 2024. The applicant is reliant on this S.247 meeting to comply with the 'Stage 1' LRD meeting requirements. The record of this meeting is included in Appendix 1, in accordance with the requirements of Article 16A(8) of the Planning and Development Regulations 2001, as amended.

6.2 LRD Meeting

A meeting under Section 32C of the Planning and Development Act, 2000 (as amended) (LRD Meeting) took place via Microsoft Teams on the 18th December 2024 between representatives of the prospective Applicant and Fingal County Council. The main topics discussed at the meeting were:

1. Part V
2. Water Services
3. Transportation
4. Green Infrastructure and open space
5. Airport Noise Zones
6. Design and Layout
7. EIA and AA

In accordance with the requirements of Article 16A(8) of the Planning and Development Regulations 2001, as amended, the record of the meeting is attached to this report as Appendix 2.

6.3 Fingal County Council Internal Consultation

In accordance with Section 32B(4) of the Planning and Development Act 2000, as amended, comments on the submitted documentation have been sought from the following departments within Fingal County Council;

- Transportation Planning Section
- Water Services Planning Section
- Parks and Green Infrastructure Division
- Housing Department
- Environment- Air & Noise & Waste Management
- Public Lighting
- Archaeology
- Architects

7.0 Forming of the Opinion

The prospective applicant submitted extensive documentation, including the information required under Article 16A(5), which includes drawings of the proposed development and various reports including the following:

- Letter of consent
- Planning Report and Statement of Consistency (Downey Planning)
- Site location map, site layout plan, and all other architectural drawings, Housing Quality Assessment, and Architectural Design Statement, prepared by Crawford Architecture;
- Childcare Demand Assessment and Community and Social Infrastructure Audit, prepared by DOWNEY;
- Stage 1 Flood Risk Assessment, DMURS Compliance Statement, Construction and Environmental Management Plan, Engineering Services Report, and all engineering drawings prepared by Barrett Mahony Consulting Engineers;
- Scoping Letter prepared by Altemar Environmental Consultants regarding survey work carried out and the AA Screening and EclA;
- Landscaping drawings, masterplan and report prepared by Ronan MacDiarmada & Associates;
- Tree Survey Plan, Tree Schedule, and Tree Protection Plan prepared by Charles McCorkell Arboricultural Consultancy;
- Archaeological Impact Assessment Report conducted by Archaeology Consultancy Services Unit;
- Acoustic Design Statement prepared by Wave Dynamic Acoustic Consultants and,
- Scoping letter from 3D Design Bureau.

8.0 Appraisal

Based on the information submitted by the applicant in accordance with Section 32B of the Planning and Development Act 2000, as amended, the proposed development falls within the definition of Large-Scale Residential Development as set out in Section 2 of the Planning and Development Act 2000, as amended.

Having examined and considered the information submitted by the applicant, the submissions from the internal consultees, the discussions which took place at the LRD Meeting and having regard to national policy including the NPF and Section 28 Ministerial Guidelines, regional policy including the RSES, local policy in terms of the Fingal Development Plan 2023-2029, it is recommended that the Planning Authority serve notice on the prospective applicant as outlined below.

9.0 Opinion

It is recommended that the Planning Authority serve notice on the prospective applicant, pursuant to Section 32D of the Planning and Development Act 2000, as amended, stating that the documentation

submitted within the consultation request under Section 32B of the Act does **not** constitute a reasonable basis on which to make an application for permission for the proposed Large-Scale Residential Development.

Fingal County Council has considered the documentation submitted with the consultation request under Section 32B of the Planning and Development Act 2000, as amended and is of the opinion that the documents submitted do not constitute a reasonable basis on which to make an application for the proposed large scale residential development.

In accordance with Section 32 D(2) of the Planning and Development Act 2000, as amended, in respect of which the documents submitted do not constitute a reasonable basis. The following further information should be considered and the proposal amended accordingly in order to progress the proposal:

- 1.1 Further consideration should be given to the concerns raised regarding the scale and massing of the proposed five storey apartment blocks at the eastern location of the site, taking into account the rural and transitional nature of the site in relation to the adjoining Green Belt lands to the south. In particular the design, finish, roof profile and cantilevered style balconies should be reviewed at this prominent location adjoining the road. The applicant should reconsider reducing the building height of the apartments which are overbearing and in particular to the south, or recessing the upper floors and reassessing the proximity of the development to the road to reduce the perceived mass. The building shape provides an opportunity to provide semi-recessed balconies to the corners without compromising daylight.
- 1.2 The design of the proposed development as a whole 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. More detail is required to be provided regarding the proposed finishes and textures of all proposed units, which should include a variety of materials and textures. The position of the proposed units in Zone B directly on the boundary with the lands to the south (Greenbelt) is not appropriate, and the Planning Authority suggest introducing a landscaped buffer or other means of separation and reorientating these units with entrances and/or living spaces or windows from active rooms (e.g., kitchens, living rooms) overlooking the lands to the south. Zone E units in the western section of the site are considered remote and detached from the remainder of the proposal and should be reconsidered.
- 1.3.a Further consideration should be given to the overall layout of the proposal given the existing Hedgerow along the northern boundary which is a townland boundary and the indicated road proposal to the southern boundary. As per Objective DMSO128 & Objective SPQHO91 of Fingal's County Development Plan, a management plan should be provided to retain the hedgerow's historic value as a townland boundary. The applicant should demonstrate how the townland boundary hedgerow to the north of the site will be maintained and provided with supplementary planting to retain the hedgerow's historic value as a townland boundary and in this regard an Arboricultural Method statement is required. The pathway running east to west along the northern boundary should be continuous and not broken up. The layout of this path should be reconsidered, with input from the appointed arborist & landscape architect as the route is located within a "no dig zone".

1.3.b The applicant must clearly demonstrate how it is proposed to meet Development Plan standards in terms of Public Open Space provision (Table 4.2 of the Development Plan). In this regard, it is important that Public Open Space is usable and that the central area is of large enough a scale to accommodate natural play and the Landscape Rationale document should be revised to clearly show the linear open space to the north as Environmental Open Space. Proposed open spaces shall be level and cross sections to illustrate same should be submitted with any application. The proposed pedestrian link between the subject site along the northern boundary into Ridgewood Green needs further consideration. Its current location does not link to existing paths in the adjacent site.

1.4 Given that the eastern portion of the site is within Noise Zone B of Dublin Airport and the western section within Noise Zone C, concern has been expressed at both meetings with the potential for excessive internal and external ambient noise at the proposed development. The Noise assessment submitted is noted, however with regard to the modelling of noise impacts, the applicants are requested to clarify what assumptions are made for the modelling of aircraft noise on the site and to provide separate results (drawings) showing the predicted impacts from aircraft and road noise on the site at the 3 heights already used. Further details on the source of the night-time Maximum Noise Events are required. The applicant also should clarify whether the sources are either Aircraft or Road related (or both). The proposed buildings on the eastern side of the site should be reorientated so the balconies can be facing away from the road noise source. The mitigation proposed in the form of noise barrier walls are not considered favourably, however further details should be submitted on these noise barrier walls proposed for the site to include locations, drawings which illustrate dimensions, construction materials to be used and final finishes. A Visual Impact Assessment of the overall proposal should also be submitted.

It is also recommended that the prospective applicant be notified, pursuant to article 16A(7) of the Planning and Development (Large Scale Residential Development) Regulations 2001, as amended, in addition to the requirement as specified in Articles 20A, 22 and 23, the following information should be submitted with any LRD application for permission:

Transportation Considerations

- 2.1 The exact location of the 'pedestrian link into adjacent open space', as shown on the 'proposed site layout plan' should be given further consideration in regard to the layout of the adjacent existing development to the north.
- The Planning Authority have a strong preference that a verge and street trees would be provided between the road edge and the southern boundary wall/fence, along the main internal access road along the southern boundary of the site; this would be beneficial to ensure a safe distance between the road carriageway and hard edge; and would also help screen the proposed development from the potential future road objective directly adjacent to the south.
 - The applicant should give further consideration to the layout of the pedestrian route/greenway that runs east-west on the northern side of the site, to provide continuous uninterrupted connectivity.

- Further consideration should be given to the layout of the main internal access road along the southern boundary of the site, from the perspective of DMURS, to **help calm the traffic and along the straight section of road.**
- The applicant should give further consideration to the 'entry treatment' to the 'shared surface/homezones'; taking cognisance of the 'NTA Active Travel Guidance Note on Junction Tightening Schemes'; and DMURS Advice Note 6 - Priority Junction Tightening Measures.
- The road carriageways in the 'shared surface/homezones', should ideally have a different surface colour from the other standard road carriageways, such as a red asphalt surface (we can provide the acceptable FCC specification for the material). There is clear advice on this in DMURS.
- Further consideration given to the layout of the specific cul-de-sac/'homezone' located second from the western side (i.e. the street between 'zone c' and 'zone D'), which is dominated by perpendicular parking on both sides. The applicant should consider 'breaking-up' the parking dominance by potential introduction of a landscaping strip, or potentially providing parallel parking on one side and perpendicular on the other (as is recommended in DMURS) and the applicant should also take cognisance of page 121 of DMURS (section 4.4.9) which describes dimensions for carparking, and may need to consider making the carparking bays wider (i.e. potentially 2.6m in this scenario) in order to allow cars to be able to exit/enter the spaces in one movement.
- The applicant should demonstrate that the dimensions of the carparking spaces is sufficient and that they comply with the DMURS guidance, and Part M at house entrances, where necessary.
- Further consideration to the detail where parking spaces with permeable paving are located directly adjacent to road carriageways, with consideration for a construction detail preventing the road build up being undermined by surface water should be considered.
- It is recommended that a dedicated carparking drawing be developed to clearly outline the proposed carparking strategy and identify which carparking spaces are assigned to which unit/block.

2.2 The applicant should give further consideration to the proposed footpath and boundary setback along Forest Road as follows:

- i. A new concrete kerb along the entire length of road carriageway fronting the proposed development, with associated drainage gullies to drain into the existing surface water infrastructure on Forest Road.
 - ii. A 1.5m wide grass verge (a 1m wide verge is generally required, in this case we require an additional 0.5m to allow for future potential widening of the road carriageway)
 - iii. A 2m wide cycletrack.
 - iv. A 2m wide footpath.
- A stage 1 Road Safety Audit, carried out by an independent 3rd party, in compliance with the TII Publication 'Road Safety Audit GE-STY-01024' should be provided. It should ideally be carried out on the final layout proposed/intended for planning permission submission.
 - The applicant should provide the fully developed layout and details of the bicycle parking provision for mid-terrace units and duplex units.

- The applicant should address Section 14.17.10 of the Fingal Development Plan 2023-2029; which describes that all of the 'non-in-curtilage/on-street' residential carparking spaces (i.e. that don't have access to provide their own EV charging infrastructure) shall incorporate functioning EV charging points at a minimum rate of 20% of the proposed parking spaces, and appropriate infrastructure (e.g. ducting) to allow for future fit out of a charging points at the remaining 80% of residential non-in-curtilage/ on-street parking spaces. Publicly accessible EV parking spaces shall be clearly marked and be capable of communicating usage data with the National Charge Point Management System.
- The Transportation Planning Section has a strong preference that the pedestrian/greenway routes are sufficiently illuminated with public lighting, and coordination with the requirements of the Councils Public Lighting Section, the Parks and Green Infrastructure Division, and Ecologist may be required.

Water Services Considerations

Foul drainage: Uisce Eireann

The applicant has submitted a Pre-connection Enquiry to Uisce Eireann on 26th July 2024. Confirmation of Feasibility is still awaited.

It is proposed to connect into an existing 225mm diameter gravity sewer at the entrance to Ridgewood estate from the Forest Road. Levels however tentatively indicate that pumping would be required – this has also been flagged during the Stage 1 meeting but has not yet been confirmed. In the event that a pumping station is indeed required a minimum buffer zone of 35m is required in accordance with IUO7 of the CDP and this will necessitate significant re-design of the current layout.

Surface water drainage:

The surface water drainage strategy is generally acceptable and in accordance with the principles of the GDSDS. The applicant proposes to connect into an existing surface water system in Forest Road. However, a number of detailed design issues require clarification, as follows:

- 3.1 The applicant is requested to confirm **whether a ground investigation has been carried out and to include this report with any further submission**. This should be used to inform the surface water drainage strategy and indeed to affirm any assumptions that have been made with regards to permeability, groundwater, SOIL value used in the Qbar calculation, etc.
- 3.2 The site has been divided into two catchment areas. The report contains anomalies regarding site areas and discharge rates which need to be homogenised throughout, such as:
 - i. Qbar has been calculated as 10.86 l/s however the proposed total is $7.91 + 3.75 = 11.66$ l/s.
 - ii. The sum of the two catchments equal 2.29ha whereas the site is stated to be 2.145ha.
 - iii. The calculations also refer to a flow controlled to 4.8 l/s whereas this is elsewhere in the report referenced as 3.75 l/s.
 - iv. The applicant is requested to clarify the positively drained site area.
- 3.3 The detention basin system located with the open space need to be developed and details provided such as depth, side slopes, depth of water, freeboard, etc. Sections must be provided to visually demonstrate its characteristics and appearance in the context of the wider land/streetscape.

- 3.4 The attenuation tank system located within the homezone area of the apartment buildings will not be Taken-in-Charge. The applicant is requested to submit a TiC drawing reflecting this.
- 3.5 The proposed outfall sewer to which the applicant intends to connect into appears to incorporate an attenuation function. The applicant's site may or may not have been allowed in the design of this system and any additional discharge (even at Qbar) may result in surcharging the system and increasing flood risk elsewhere. It is noted that the system discharges into the Sluice river traversing Forrest Fields Golf Course which has been mapped as flood zone areas in the FEMFRAMS study.

Water supply: Uisce Eireann

The applicant has submitted a Pre-connection Enquiry to Uisce Eireann on 26th July 2024. Confirmation of Feasibility is still awaited.

It is proposed to connect to an existing watermain in Forest Road fronting the proposed development.

Flood risk: No objection

The applicant has submitted a site-specific flood risk assessment in accordance with the OPW Guidelines, prepared by Barrett Mahony Consulting Engineers. The assessment concludes that the proposed development is classified as 'highly vulnerable' but completely located within Flood Zone C (ie <0.01% AEP) and is therefore permissible.

Parks and Green Infrastructure Considerations

Existing trees and vegetation:

The following information is required to fully assess this proposal:

- 4.1 Hedgerow along the north boundary is a townland boundary; therefore, as per Objective DMSO128 & Objective SPQHO91 of Fingal's County Development Plan, a management plan should be provided to retain the hedgerow's historic value as a townland boundary
- 4.2 The applicant is requested to show how the townland boundary hedgerow to the north of the site will be maintained and provided with supplementary planting to retain the hedgerow's historic value as a townland boundary
An Arboricultural Method statement is required.

Objectives DMSO125 and DMSO126 of the Development Plan 2023-2029 relate to the protection of existing trees and hedgerows.

Objective DMSO125 – Management of Trees and Hedgerows

Protect, preserve and ensure the effective management of trees and groups of trees and hedgerows.

Objective DMSO126 – Protection of Trees and Hedgerows during Development

Ensure during the course of development, trees and hedgerows that are conditioned for retention are fully protected in accordance with BS5837 2012 Trees in relation to the Design, Demolition and Construction – Recommendations or as may be updated and are monitored by the appointed arboriculture consultant.

Objective DMSO128 – Demarcation of Townland Boundaries

Ensure trees, hedgerows and other features which demarcate townland boundaries are preserved and incorporated where appropriate into the design of developments.

Objective DMSO172 – Protection of Historic Townland Boundaries

Avoid detrimental impacts on historic townland boundaries. Should an historic townland boundary or section thereof be impacted a survey and photographic record should be undertaken prior to removal.

Public Open Space:

Overall Public Open Space requirement is 6,100sq m.

4.3.1 The on-site public open space provision requires further work as the extent of SUDS within the open space is unknown.

4.3.2 The location of the proposed detention basin will inform where the paths and play area will be located.

4.3.3 The Landscape Rationale Document should be revised

to clearly show the linear open space to the north as Environmental Open Space.

4.3.4 The proposed pedestrian link between the subject site along the northern boundary into Ridgewood Green needs further consideration. Its current location does not link to existing paths in the adjacent site.

4.3.5 The path way running east to west along the northern boundary should be continuous and not broken up, the applicant need to discussed the layout of this path with the arborist & landscape Architect as the route is in a “no dig zone”.

4.3.6 The proposed trees along the road boundary need to be removed to facilitate sightlines, thus this should be reflected on the landscape plan to accurately reflect the proposed development.

Transition between Greenbelt and RS zoning – the applicant has not shown hedgerow planting along this southern boundary as requested.

4.4 A clear statement and drawing are required detailing the proposed Public Open Space provision in accordance with Development Plan standards (refer to table 4.2 of development plan). The statement should directly relate to a drawing which indicates the proposed Open Space provision shown in square metres.

This drawing should show the following in square metres:

- Public Open Space
- Private/Communal Open Space
- Environmental open space
- Proposed SuDS on Open Space areas

In this regard, it is important that Public Open Space is usable and that the central area is of large enough a scale to accommodate natural play / kickabout etc.

The applicant must therefore clearly demonstrate how it is proposed to meet Development Plan standards in terms of Public Open Space provision (Table 4.2 of the Development Plan). The Development Plan objectives specifically to be referred include the following: Objective IUO11 – SuDS in New Developments and Objective DMSO17 – Location of New Utility Structures.

provision requirement:

The area required for play provision is 416 sq m. A minimum 25m separation distance is required between residential units and the proposed play facility. Play provision shall not be located in SuDS areas.

If the applicant cannot provide play equipment as per Objective DMSO68 – *Playground Facilities within Residential Development*, in regards to the minimum separation distance of 25m between residential units and play equipment not being achieved as outlined in Fingal County Councils Play Policy “*A Space for Play*”, a contribution in lieu of play provision will be sought.

4.5 Street tree plan

A street tree plan is required. Lamp standards and location of constructed tree pits to be clearly shown (7m separation distance between lamp standards and trees).

4.6 Landscape plan:

The tree/hedgerow footprint (as shown on the Tree Survey) to be clearly shown on the landscape plan.

Any SuDS features (as shown on the drainage drawings) to be clearly shown on the landscape plan- Slopes 1:5.

Cross sections between the public open space areas to the north (to include houses, road and open space) and the proposed open space / tree /hedgerow area to the south to be provided.

Cross sections to the western, eastern and southern boundaries to be provided.

4.7 Passive Overlooking of green areas

Passive supervision along the northern boundary is critical to design out anti-social behaviour. The applicant should ensure that there are no buildings such as bin stores, ESB substations on open space areas (in order to avoid anti-social behaviour).

4.8 Taking in charge plan

Areas to be taken in charge should be outlined using a thin line (as opposed to block colour). There should be no ambiguity of what is private or public on a drawing or on the ground.

Environment- Air and Noise

The following clarifications are required;

5.1 With regard to the modelling of noise impacts, the applicants are requested to clarify what assumptions are made for the modelling of aircraft noise on the site and to provide separate results (drawings) showing the predicted impacts from aircraft and road noise on the site at the 3 heights already used.

5.2 Further details on the source of the night-time Maximum Noise Events are required. The applicant should clarify are they due to Aircraft or Road sources.

5.3 The proposed buildings on the eastern side of the site should be reorientated so the balconies can be facing away from the road noise source.

5.4 Further details are required on the noise barrier walls proposed for the site to include locations, drawings which illustrate dimensions, construction materials to be used and final finishes.

Heritage Considerations

A desktop report-*Archaeological Impact Assessment Report, Proposed Residential Development at Forest Road, Forrest Great, Swords, Co. Dublin* by Magda Lyne of ACSU Ltd. (dated November 2024) was received with this submission. The site consists of a grassed field and is in proximity to an archaeological monument, Ring Ditch (DU011-119). As these types of monuments often occur in groups and in order to establish an adequate definition of the location and extent of any potential sub-surface remains, the report recommends geophysical survey and archaeological test excavation, in advance of development. Given the relative proximity of the sub-surface monument DU011-119, this can be considered a reasonable approach.

The following is required;

6.1 Geophysical survey of the site by a suitably qualified and experienced archaeological geophysicist

6.2 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.

6.3 On completion of the geophysical survey and test-excavation, the archaeologist shall submit a written report including archaeological impact statement, to the Planning Authority and to the Department of Housing, Local Government and Heritage for consideration.

Public Lighting Considerations

No information has been submitted with regard to Public Lighting and the following information is required;

7.1 TIC drawing.

7.2 Scaled drawing showing the locations of all public lighting columns and section pillars.

7.2.1 Proposed lighting class and lighting levels to be stated on the drawing.

7.2.2 Column and luminaire details to be included on the drawing.

7.2.3 Hinged columns must be used where there is less than 3.5 metres horizontal clearance on a path, or in areas inaccessible to a vehicle-mounted hoist.

7.2.4 All public lighting infrastructure must be located in public area or areas proposed to be taken in charge.

7.2.5 All landscaping, trees and traffic calming measures must also be shown on the public lighting drawing.

7.2.6 The required 7m minimum clearance between trees and public lighting columns must be adhered to.

7.2.7 The existing public lighting locations at the site entrances and along the site boundary must also be included on the drawing.

7.3 Lighting calculation report preferably in Lighting Reality format, with separate calculation grids for different parts of the site (e.g. overall, paths around open spaces, site entrances, along the main road, home zone areas, etc. Note, all calculation grids must cover back of path to back of path.).

7.4 Lighting calculation report preferably in Lighting Reality format, with separate calculation grids for different parts of the site (e.g. overall, paths around open spaces, site entrances, along the main road, home zone areas, etc. Note, all calculation grids must cover back of path to back of path.).

1. Luminaire maintenance factor, colour temperature, mounting height, angle of tilt, outreach, and proposed luminaires to be included in the calculation report.
2. The lighting standard and lighting class the proposed scheme is designed to, must also be stated in the report.

7.5 Isolux contour drawing of the proposed lighting levels.

7.6 Proposed ducting layout including all access chambers, proposed public lighting section pillars and ESB Networks section pillars.

1. All public lighting ducting must be in public areas and with the exception of road crossing ducts, they must be located in footpaths.
2. Product data sheets and drawings of proposed public lighting infrastructure (luminaires, columns, cables, ducting, section pillars, access chambers).
3. Fingal County Council LED Technical details sheets to be completed for each proposed luminaire.
4. With regards to colour temperature of proposed luminaires, . Fingal County Council policy is neutral white except in limited specific circumstances that are to be agreed with Fingal County Council Public Lighting in writing.

7.7 Circuit schematics and volt-drop calculations for the proposed circuits are required.

7.8 Details of proposed protection measures of how the public lighting infrastructure will be protected in the homezone shared surfaces areas.

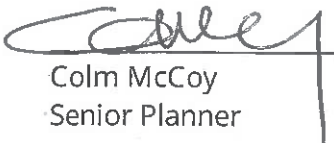
Note Items 1-8 will also be required to be resubmitted at compliance stage, to ensure the scheme is being built as agreed.

Part V Considerations

8. A Part V proposal was submitted, however the Planning Authority have requested that the developer review the proposal as per Fingal County councils' Development Plan 2023-2029, to ensure that 30% of the Part V units are universal designed and that 10% of the entire residential development should be age friendly accommodation. A revised Part V proposal should be submitted.



Patrick O'Connor
Senior Executive Planner



Colm McCoy
Senior Planner

FINGAL COUNTY COUNCIL INTERNAL CONSULTTEE

PLANNING REPORT

Report of the Transportation Planning Section

Register Reference: LRD0057/S2

Development: Goldenport Estates Ltd, intend to apply for planning permission for a Large-Scale Residential Development (LRD) on lands at Forest Road, Swords, Co. Dublin. The proposed development will consist of a total of 104 no. residential units (42 no. duplex units; 36 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 and private open space;
- (ii) 36 no. apartments within 2 blocks. Block A will be a 5 storey building with 18 no. apartments (5 no. 1 bed and 13 no. 2 bed units) with balconies/terraces to the north, east, south and west elevations, and bin, bicycle parking and plant at ground floor level and plant at roof level; Block B will be a 5 storey building with 18 no. apartments (5 no. 1 bed and 13 no. 2 bed units) with balconies/terraces to the east and west elevations and bin, bicycle parking and plant at ground floor level and plant at roof level;
- (iii) 26 no. houses (comprising 5 no. 2 bed, 2 storey houses; 10 no. 3 bed, 2 storey houses; 11 no. 4 bed, 3 storey houses) in a mix of detached and semi-detached house types;
- (iv) Surface car parking as well as bike parking stores and bin stores;
- (v) 1 no. ESB substation;
- (vi) Landscaping, new footpath and cycle path to Forest Road, boundary treatment and all associated site works necessary to facilitate the proposed development.

Location: lands at Forest Road, Swords, Co. Dublin.

Applicant: Goldenport Estates Ltd

Application Type: LRD Meeting

General

The proposed development is located in an area with a 80km/hr speed limit, which transitions to a 50km speed limit at a location circa 100m to the north of the proposed new vehicular entrance.

Access/Sightlines

A detailed sightline drawing should be provided for the vehicular entrance onto the Forest Road, demonstrating sightlines as per the requirements of DN-GEO-03060 (as published by Transport Infrastructure Ireland (TII)) and DMURS.

The Transportation Planning has no issue with the general principle of the location of the proposed vehicular entrance.

Car Parking

In regard to the Sustainable Residential Development and Compact Settlement Guidelines for Local Authorities; the site is within 500m walking distance of the proposed Bus Connects radial routes 22 (peak hour frequency 15mins) and L81(peak hour frequency 20mins), which combined, would provide a frequency of circa 10 minutes; and circa 1.5km from the A4 route which has a frequency of 12 minutes; and also within circa 1.7km walking distance of the planned Metro Station. We consider that this would place the site in an 'Accessible' location as defined in table 3.8 of the 'Compact Settlement Guidelines'; and SPPR 3 states 'In 'accessible' locations, defined in Chapter 3 (Table 3.8) car-parking provision should be substantially reduced, the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.

The Fingal Development Plan 2023-2029 creates two distinct parking zones to ensure adequate residential parking provision and the control of destination car parking. This approach also allows greater flexibility in the application of car parking standards on sites in areas with varying levels of road and public transport provision. The car parking requirements for 'Zone 1' are maximums. The proposed development is generally within a 1.6km radius of the Bus Connects Core Bus Corridor and the Metro Station, which would place the proposed development in 'zone 1', which would place a carparking requirement on the development of maximum 1 car parking space per 3+-bedroom unit, and 0.5 spaces per 1-2 bedroom unit; in regard to the standards of the Fingal Development Plan.

It should be noted that the standards of the 'Sustainable Residential Development and Compact Settlement Guidelines for Local Authorities' takes precedence over the standards of the Fingal Development Plan.

The approach taken to the quantity of carparking appears to generally align with the Fingal Development Plan Standards for 'Zone 1' and the 'Sustainable Residential Development and Compact Settlement Guidelines for Local Authorities'; however, we recommend that a dedicated carparking drawing be developed to clearly outline the proposed carparking strategy and identify which carparking spaces are assigned to which use/block.

Bicycle Parking

The proposed development would provide on-curtilage bike stores for mid terrace houses and duplex units; and this approach is generally acceptable in principle; however, the information submitted is lacking and the detail and layout should be further considered and developed.

The approach taken to the bicycle parking for the apartment blocks is generally acceptable in principle.

We recommend that the applicant give further consideration to ensuring that the development management company/owners management company would provide that the cycle parking areas are subject of a funded maintenance regime that ensures that facilities are kept clean, free of graffiti, well-lit and the parking equipment will be properly maintained.

Layout

The applicant has provided a detailed statement of consistency with DMURS; and the approach taken is generally acceptable in principle.

We recommend that the applicant give further consideration to the following, and amend the layout where necessary:

- We recommend that the exact location of the 'pedestrian link into adjacent open space', as shown on the 'proposed site layout plan' should be given further consideration in regard to the layout of the adjacent existing development to the north, to ensure its suitably located to allow for a future uninterrupted pedestrian connectivity link.
- We have a strong preference that a verge and street trees would be provided between the southern access road edge and the southern boundary wall/fence, along the main internal access road along the southern boundary of the site; this would be beneficial to ensure a safe distance between the road carriageway and hard edge; and would also help screen the proposed development from the potential future road objective directly adjacent to the south.
- We recommend that the applicant give further consideration to the layout of the pedestrian route/greenway that runs east-west on the northern side of the site, to provide continuous uninterrupted connectivity; and also to give consideration to providing this route as a shared cycle /pedestrian route (as per the design of the NTA Cycle Design Manual)
- We recommend that the applicant give further consideration to the layout of the main internal access road along the southern boundary of the site, from the perspective of DMURS, to help calm the traffic and along the straight section of road.
- We recommend that the applicant give further consideration to the 'entry treatment' to the 'shared surface/homezones'; taking cognisance of the 'NTA Active Travel Guidance Note on Junction Tightening Schemes'; and DMURS Advice Note 6 - Priority Junction Tightening Measures.
- We recommend that the applicant give further consideration to the road carriageways in the 'shared surface/homezones', which should ideally have a different surface colour from the other standard road carriageways, such as a red asphalt surface (we can provide the acceptable FCC specification for the material). There is clear advice on this in DMURS.
- We recommend that the applicant give further consideration to the layout of the specific cul-de-sac/'homezone' located second from the western side (i.e. the street between 'zone c' and 'zone D'), which is dominated by perpendicular parking on both sides. The applicant could consider 'breaking-up' the parking dominance by potential introduction of a landscaping strip, or potentially providing parallel parking on one side and perpendicular on the other (as is recommended in DMURS) and the applicant should also take cognisance of page 121 of DMURS (section 4.4.9) which describes dimensions for carparking, and may need to consider making the carparking bays wider (i.e. potentially 2.6m in this scenario) in order to allow cars to be able to exit/enter the spaces in one movement.
- We recommend that the applicant give further consideration to demonstrating that the dimensions of the carparking spaces is sufficient and that they comply with the DMURS guidance, and Part M at house entrances, where necessary.
- We recommend that the applicant give further consideration to the detail where parking spaces with permeable paving is located directly adjacent to road carriageways, with consideration for a construction detail preventing the road build up being undermined by surface water should be considered.

Public Lighting

The Transportation Planning has a preference that all footpath/greenway routes are sufficiently illuminated with public lighting, however we note that there may be some ecological/green infrastructure issues to be considered in regard to location of lighting.

Road Safety Audit

A Stage 1 Road Safety Audit must be provided, carried out by an independent 3rd party, in compliance with the TII Publication 'Road Safety Audit GE-STY-01024'. It should ideally be carried out on the final layout proposed/intended for planning permission submission.

Swept Path Analysis/Emergency Vehicles Access

A swept path analysis has been included for a fire tender and a refuse collection vehicle.

Taking in-charge

The applicant has provided a drawing titled 'Taking in Charge'; which highlights the areas that the applicant proposes to be taken in charge by the Council. The layout generally appears to be acceptable in principle; however, the applicant is advised to take cognisance of the following points:

- The Councils Taking in Charge Policy/Specification Appendix 6 Section 8 states the following: " All roads to be taken in charge will be taken in charge at a minimum from the back of footpath/cycle path on one side of the road to the back of footpath/cyclepath on the other side of the road in line with the definition of a road in the 1993 Roads Act Part 1 Section 2(1).
- The consequence of the above point is that the Councils taking in charge policy, by default, requires all 'non in-curtilage carparking/on-street car parking spaces' located between the footpath and road carriageway proposed to be taken in charge by the Council, could not be designated to any particular unit and would become public carparking spaces.
- All areas that are proposed to be 'taken in charge' by the Council, should be constructed and maintained to the Councils standards for taking in charge, including roads, footpaths, verges, public lighting, open space, sewers, watermains or drains, forming part of the development.
- Permeable asphalt surface and road structural build-up does not meet the Councils standards for taking in charge, and its use would likely preclude a road from being taken in charge.
- Public infrastructure such as stormwater drainage and streetlighting, should be located in areas to be taken-in-charge by the Council.

Electric Vehicle (EV) charging

The applicant should address Section 14.17.10 of the FDP 2023-2029; which describes that all of the 'non-in-curtilage/on-street' residential carparking spaces (i.e. that don't have access to provide their own EV charging infrastructure) shall incorporate functioning EV charging points at a minimum rate of 20% of the proposed parking spaces, and appropriate infrastructure (e.g. ducting) to allow for future fit out of a charging points at the remaining 80% of residential non-in-curtilage/ on-street parking spaces. Publicly accessible EV parking spaces shall be clearly marked and be capable of communicating usage data with the National Charge Point Management System. EV parking spaces for accessible spaces shall also be included in the development where these exist.

Setbacks/Reservation for County Development Plan Objectives

The Fingal Development Plan 2023-2029 contains the following policy and objectives which would support the provision of development setbacks in order to provide future road upgrades:

- Objective DMSO116 – Provision of Building Setbacks – ‘Seek to provide appropriate building setbacks along the road network to facilitate future road improvements.’
- Objective CMO6 – Improvements to the Pedestrian and Cyclist Environment
- Objective CMO13 – Walking and Cycling Network and Tourist Trails
- Policy CMP1 –Decarbonisation of Motorised Transport
- Policy CMP7 – Pedestrian and Cycling Network

Forest Road is designated as a future ‘secondary’ cycle route in the Greater Dublin Area Cycle Network Plan published by the National Transport Authority. The Fingal Development Plan Map Sheet No.8 also contains an indicative cycle route along this stretch of Back Road. There is no route location or design in place for this future route.

From a site visit it was observed that the existing road carriageway has a width of circa 6m, with a circa 1m wide grass verge on both sides of the road. (i.e an overall existing road width of circa 8m.) The land directly opposite is also zoned residential.

Directly to the north of the site (circa 40m), the road carriageway width widens to circa 7-7.5m with a 1.5m wide verge, a 1.4m wide cycletrack and 1.5m wide footpath on the northern side; and no infrastructure on the southern side.

A further circa 45m north, there is also pedestrian and cycle facilities on the opposite side of the road, consisting of a 1.3m wide grass verge, a 1m wide cycletrack and 1.2m wide footpath

The Transportation Planning Section considers that the applicant should provide an offset of the site boundary fence of circa 5.5m measured from the existing road carriageway edge; to allow for the delivery of the following:

- A widened road carriageway, 0.5m
- A 1m wide grass verge
- A 2m wide cycle lane
- and a 2m wide footpath.

Conclusion

The Transportation Planning Section recommends that the applicant give further consideration to the following items, and amend the layout and details where necessary:

1. In regard to the general layout, the Transportation Planning Section recommends that the applicant give further consideration to the following, and amend the layout where necessary:
- 7 We recommend that the exact location of the ‘pedestrian link into adjacent open space’, as shown on the ‘proposed site layout plan’ should be given further consideration in regard to the layout of the adjacent existing development to the north.
- 8 We have a strong preference that a verge and street trees would be provided between the road edge and the southern boundary wall/fence, along the main internal access road along the southern boundary of the site; this would be beneficial to ensure a safe distance between the road carriageway and hard edge; and would also help screen the proposed development from the potential future road objective directly adjacent to the south.
- 9 We recommend that the applicant give further consideration to the layout of the pedestrian route/greenway that runs east-west on the northern side of the site, to provide continuous uninterrupted connectivity.

- 10 We recommend that the applicant give further consideration to the layout of the main internal access road along the southern boundary of the site, from the perspective of DMURS, to help calm the traffic and along the straight section of road.
 - 11 We recommend that the applicant give further consideration to the 'entry treatment' to the 'shared surface/homezones'; taking cognisance of the 'NTA Active Travel Guidance Note on Junction Tightening Schemes'; and DMURS Advice Note 6 - Priority Junction Tightening Measures.
 - 12 We recommend that the applicant give further consideration to the road carriageways in the 'shared surface/homezones', which should ideally have a different surface colour from the other standard road carriageways, such as a red asphalt surface (we can provide the acceptable FCC specification for the material). There is clear advice on this in DMURS.
 - 13 We recommend that the applicant give further consideration to the layout of the specific cul-de-sac/'homezone' located second from the western side (i.e. the street between 'zone c' and 'zone D'), which is dominated by perpendicular parking on both sides. The applicant should consider 'breaking-up' the parking dominance by potential introduction of a landscaping strip, or potentially providing parallel parking on one side and perpendicular on the other (as is recommended in DMURS) and the applicant should also take cognisance of page 121 of DMURS (section 4.4.9) which describes dimensions for carparking, and may need to consider making the carparking bays wider (i.e. potentially 2.6m in this scenario) in order to allow cars to be able to exit/enter the spaces in one movement.
 - 14 We recommend that the applicant give further consideration to demonstrating that the dimensions of the carparking spaces is sufficient and that they comply with the DMURS guidance, and Part M at house entrances, where necessary.
 - 15 We recommend that the applicant give further consideration to the detail where parking spaces with permeable paving are located directly adjacent to road carriageways, with consideration for a construction detail preventing the road build up being undermined by surface water should be considered.
-
2. We recommend that a dedicated carparking drawing be developed to clearly outline the proposed carparking strategy and identify which carparking spaces are assigned to which unit/block.
 3. We recommend that the applicant give further consideration to the proposed footpath and boundary setback along Forest Road as follows:
 - A new concrete kerb along the entire length of road carriageway fronting the proposed development, with associated drainage gullies to drain into the existing surface water infrastructure on Forest Road.
 - A 1.5m wide grass verge (a 1m wide verge is generally required, in this case we require an additional 0.5m to allow for future potential widening of the road carriageway)
 - A 2m wide cycletrack.
 - A 2m wide footpath.
 4. A stage 1 Road Safety Audit, carried out by an independent 3rd party, in compliance with the TII Publication 'Road Safety Audit GE-STY-01024' should be provided. It should ideally be carried out on the final layout proposed/intended for planning permission submission.
 5. We recommend that the applicant give further consideration to providing the fully developed layout and details of the bicycle parking provision for mid-terrace units and duplex units.
 6. The applicant should address Section 14.17.10 of the Fingal Development Plan 2023-2029; which describes that all of the 'non-in-curtilage/on-street' residential carparking spaces (i.e. that don't have access to provide their own EV charging infrastructure) shall incorporate functioning EV charging points at a minimum rate of 20% of the proposed parking spaces, and appropriate infrastructure (e.g. ducting) to allow for future fit out of a charging points at the remaining 80% of

residential non-in-curtilage/ on-street parking spaces. Publicly accessible EV parking spaces shall be clearly marked and be capable of communicating usage data with the National Charge Point Management System.

7. The Transportation Planning Section has a strong preference that the pedestrian/greenway routes are sufficiently illuminated with public lighting, and coordination with the requirements of the Councils Public Lighting Section, the Parks and Green Infrastructure Division, and Ecologist may be required.

Signed: Shane Comaskey

Date: 06/01/2024

Endorsed: _____

Date: _____

FINGAL COUNTY COUNCIL INTERNAL CONSULTEE
PLANNING REPORT
Report of Housing Department

Part V proposal submitted, however requested the developer to review the proposal as per Fingal County councils' development plan 2023-2029, to ensure that 30% of the Part V units are universal designed and that 10% of the entire residential development should be age friendly accommodation. A revised Part V proposal to be submitted.

From: Shauna Hughes <Shauna.Hughes@fingal.ie>

**FINGAL COUNTY COUNCIL INTERNAL CONSULTEE
PLANNING REPORT
Report of the Water Services Department**

Register Reference: LRD0057/S2

Registration Date: 25-Nov-2024

Development: Goldenport Estates Ltd, intend to apply for planning permission for a Large-Scale Residential Development (LRD) on lands at Forest Road, Swords, Co. Dublin.

The proposed development will consist of a total of 104 no. residential units (42 no. duplex units; 36 no. apartments; 26 no. houses).

Location: Lands to the west of Forest Road at Forrest Great, directly south of Ridgewood Green, Swords, Dublin

Applicant: Goldenport Estates Ltd

Application Type: LRD Meeting

Report

Flood risk: No objection

The applicant has submitted a site-specific flood risk assessment in accordance with the OPW Guidelines, prepared by Barrett Mahony Consulting Engineers. The assessment concludes that the proposed development is classified as 'highly vulnerable' but completely located within Flood Zone C (ie <0.01% AEP) and is therefore permissible.

Foul drainage: Uisce Eireann

The applicant has submitted a Pre-connection Enquiry to Uisce Eireann on 26th July 2024. Confirmation of Feasibility is still awaited.

It is proposed to connect into an existing 225mm diameter gravity sewer at the entrance to Ridgewood estate from the Forest Road. Levels however tentatively indicate that pumping would be required – this has also been flagged during the Stage 1 meeting but has not yet been confirmed. In the event that a pumping station is indeed required a minimum buffer zone of 35m is required in accordance with IUO7 of the CDP and this will necessitate significant re-design of the current layout.

Surface water drainage: No objection subject to:

The surface water drainage strategy is generally acceptable and in accordance with the principles of the GDSDS. The applicant proposes to connect into an existing surface water system in Forest Road. However a number of detailed design issues require clarification, as follow;

- 16 The applicant is requested to confirm whether a ground investigation has been carried out and to include this report with any further submission. This should be used to inform the

surface water drainage strategy and indeed to affirm any assumptions that have been made with regards to permeability, groundwater, SOIL value used in the Qbar calculation, etc.

- 17 The site has been divided into two catchment areas. The report contains anomalies regarding site areas and discharge rates which need to be homogenised throughout, such as:
 - 17.1 Qbar has been calculated as 10.86 l/s however the proposed total is $7.91 + 3.75 = 11.66$ l/s.
 - 17.2 The sum of the two catchments equal 2.29ha whereas the site is stated to be 2.145ha.
 - 17.3 The calculations also refer to a flow controlled to 4.8 l/s whereas this is elsewhere in the report referenced as 3.75 l/s.
 - 17.4 The applicant is requested to clarify the positively drained site area.
- 18 The detention basin system located with the open space need to be developed and details provided such as depth, side slopes, depth of water, freeboard, etc. Sections must be provided to visually demonstrate its characteristics and appearance in the context of the wider land/streetscape.
- 19 The attenuation tank system located within the homezone area of the apartment buildings will not be Taken-in-Charge. The applicant is requested to submit a TiC drawing reflecting this.
- 20 The proposed outfall sewer to which the applicant intends to connect into appears to incorporate an attenuation function. The applicant's site may or may not have been allowed in the design of this system and any additional discharge (even at Qbar) may result in surcharging the system and increasing flood risk elsewhere. It is noted that the system discharges into the Sluice river traversing Forrest Fields Golf Course which has been mapped as flood zone areas in the FEMFRAMS study.

Water supply: Uisce Eireann

The applicant has submitted a Pre-connection Enquiry to Uisce Eireann on 26th July 2024. Confirmation of Feasibility is still awaited.

It is proposed to connect to an existing watermain in Forest Road fronting the proposed development.

Engineer: **PG**
Date: **6.1.25**

Endorsed: **DD**
Date: **13/01/2025**

FINGAL COUNTY COUNCIL INTERNAL CONSULTTEE
PLANNING REPORT
Report of Architects Department

Register Reference: LRD0057/S2

Report

- 21 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 reargarden walls create unsupervised spaces, increasing vulnerability to anti-social behavior and the rear gardens themselves may also become targets due to their exposure. Consider reorientating dwellings to have the entrances and/or living spaces or windows from active rooms (e.g., kitchens, living rooms) overlooking the open space, and limit the extent rear garden boundaries.
- 22 Apartments - The height of the 5 storey apartment blocks seems excessive at the edge of Swords, particularly near the road, causing visual and contextual challenges. Consider reducing the building height to the south with stepped forms or recessed upper floors, and reassess the proximity to the road to reduce the perceived mass.
- 23 Apartments - Please reconsider the extent of fully protruding clip-on balconies - the building shape provides an opportunity to provide semi-recessed balconies to the corners without compromising daylight.
- 24 Provide more detail on the proposed finishes, which should include a variety of materials and textures.
- 25 The position of the units in Zone B directly on the boundary with the lands to the south (Greenbelt) is not appropriate, please consider introducing a landscaped buffer or other separation, and reorientate these units with entrances and/or living spaces or windows from active rooms (e.g., kitchens, living rooms) overlooking the lands to the south.
- 26 Part V units - 30% to be adaptable/UD - the current layout with relatively narrow bedrooms will not support wheelchair accessibility, and it is recommended that this is review to ensure compliance with universal design standards.
- 27 Mid-terrace houses - Provide updated elevations showing the placement of bin and bike stores in relation to the window to the front facade, to demonstrate that they do not obstruct the windows.
- 28 General - Include a dedicated storage area near the main entrance of all unit types for coats and outdoor essentials, and ensure that additional storage is accessible from other main circulation spaces. Please also allocate sufficient dedicated space for water storage, heating and ventilation plant/equipment in addition to the minimum required storage provisions for each dwelling type.

Regards

Annamie Pretorius MRIAI- Senior Executive Architect

**FINGAL COUNTY COUNCIL INTERNAL CONSULTTEE
PLANNING REPORT
Report of Parks and Green Infrastructure Division**

Report

The Parks and Green Infrastructure Division's comments are as follows:

PARKS REPORT

Existing trees and vegetation:

The following information is required to fully assess this proposal:

Hedgerow along the north boundary is a townland boundary; therefore, as per Objective DMSO128 & Objective SPQHO91 of Fingal's County Development Plan, a management plan should be provided to retain the hedgerow's historic value as a townland boundary

The applicant is requested to show how the townland boundary hedgerow to the north of the site will be maintained and provided with supplementary planting to retain the hedgerow's historic value as a townland boundary

An Arboricultural Method statement is required.

Objectives DMSO125 and DMSO126 of the Development Plan 2023-2029 relate to the protection of existing trees and hedgerows.

Objective DMSO125 – Management of Trees and Hedgerows

Protect, preserve and ensure the effective management of trees and groups of trees and hedgerows.

Objective DMSO126 – Protection of Trees and Hedgerows during Development

Ensure during the course of development, trees and hedgerows that are conditioned for retention are fully protected in accordance with BS5837 2012 Trees in relation to the Design, Demolition and Construction – Recommendations or as may be updated and are monitored by the appointed arboriculture consultant.

Objective DMSO128 – Demarcation of Townland Boundaries

Ensure trees, hedgerows and other features which demarcate townland boundaries are preserved and incorporated where appropriate into the design of developments.

Objective DMSO172 – Protection of Historic Townland Boundaries

Avoid detrimental impacts on historic townland boundaries. Should an historic townland boundary or section thereof be impacted a survey and photographic record should be undertaken prior to removal.

Public Open Space:

Overall Public Open Space requirement is 6,100sq m.

The on-site public open space provision requires further work as the extent of SUDS within the open space is unknown.

The location of the proposed detention basin will inform where the paths and play area will be located.

The Landscape Rationale Document should be revised to clearly show the linear open space to the north as Environmental Open Space.

The proposed pedestrian link between the subject site along the northern boundary into Ridgewood Green needs further consideration. Its current location does not link to existing paths in the adjacent site.

The path way running east to west along the northern boundary should be continuous and not broken up, the applicant need to discussed the layout of this path with the arborist & landscape Architect as the route is in a "no dig zone".

The proposed trees along the road boundary need to be removed from the landscape plan to facilitate sightlines.

Transition between Greenbelt and RS zoning – the applicant has not shown hedgerow planting along this southern boundary as requested.

A clear statement and drawing are required detailing the proposed Public Open Space provision in accordance with Development Plan standards(refer to table 4.2 of development plan). The statement should directly relate to a drawing which indicates the proposed Open Space provision shown in square metres.

This drawing should show the following in square metres:

- Public Open Space
- Private/Communal Open Space
- Environmental open space
- Proposed SuDS on Open Space areas

In this regard, it is important that Public Open Space is usable and that the central area is of large enough a scale to accommodate natural play / kickabout etc.

The applicant must therefore clearly demonstrate how it is proposed to meet Development Plan standards in terms of Public Open Space provision (Table 4.2 of the Development Plan). The Development Plan objectives specifically to be referred include the following:

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 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 DMSO17 – Location of New Utility Structures

Where possible, new utility structures such as electricity substations and telecommunication equipment cabinets should not be located adjacent or forward of the front building line of buildings

or on areas of open space.

Play provision requirement:

416 sq m

A minimum of 25m separation distance is required between residential units and the proposed play facility.

Play provision shall not be located in SuDS areas.

If the applicant cannot provide play equipment as per Objective DMSO68 – *Playground Facilities within Residential Development*, in regards to the minimum separation distance of 25m between residential units and play equipment not being achieved as outlined in Fingal County Councils Play Policy “*A Space for Play*”, a contribution in lieu of play provision will be sought.

Street tree plan

Street tree plan is required. Lamp standards and location of constructed tree pits to be clearly shown (7m separation distance between lamp standards and trees).

Landscape plan:

The tree/hedgerow footprint (as shown on the Tree Survey) to be clearly shown on the landscape plan.

Any SuDS features (as shown on the drainage drawings) to be clearly shown on the landscape plan. Slopes 1:5.

Cross sections between the public open space areas to the north (to include houses, road and open space) and the proposed open space / tree /hedgerow area to the south to be provided.

Cross sections to the western, eastern and southern boundaries also to be provided.

Passive Overlooking of green areas

Passive supervision along the northern boundary is critical to design out anti-social behaviour.

Ensure that there are no buildings such as bin stores, ESB substations on open space areas (in order to avoid anti-social behaviour).

Taking in charge plan

Areas to be taken in charge to be outlined using a thin line (as opposed to block colour) There should be no ambiguity of what is private / public either on a drawing or on the ground.

FINGAL COUNTY COUNCIL INTERNAL CONSULTEE
PLANNING REPORT
Report of Environment- Air & Noise

Finbarr Quigley dealt with the Noise Consultant report and spoke with James Cousins (Wave Dynamics Acoustic Consultants). The following clarifications were sought:

- Regarding the modelling of noise impacts, the applicants are requested to clarify what assumptions are made for the modelling of aircraft noise on the site and to provide separate results (drawings) showing the predicted impacts from aircraft and road noise on the site at the 3 heights already used.
- Further details on the source of the night-time Maximum Noise Events. Are they due to Aircraft or Road sources?
- Query on whether the buildings on the eastern side can be orientated to have balconies facing away from the road noise source.
- Further details on the noise barrier walls proposed for the site to include locations, dimensions, construction materials to be used and final finishes.

FINGAL COUNTY COUNCIL INTERNAL CONSULTEE
PLANNING REPORT
Report of Environment- Waste Management

See below from Waste Enforcement:

1/ An operational waste management plan will be required to be prepared if the development proceeds. OWMP to be prepared as follows:

- a) OWMP to estimate the waste generation from the development using “BS5906:2005 Waste Management in buildings – Code of Practice” – household waste to be calculated separate from commercial waste and kept separate for collection.
- b) Volume of waste generated split into various waste streams: mixed dry recyclables, glass, food waste, mixed residual waste.
- c) Detailed drawings of Waste Storage Areas for apartments showing the layout of the bins – demonstrating WSA size is suitable for quantity of waste generated.
- d) Waste Storage Area design to follow considerations provided in sections 4.8 and 4.9 of “Sustainable Urban Housing: Design Standards for New Apartment”, Dec 2020.
- e) for individual dwellings not having side access to back garden (ie. Mid terrace), details of where the 3 bins will be stored to the front of the property

2/ If granted permission, a condition seeking a C&D Resource Waste Management Plan will be sought:

Prior to the commencement of development, the applicant shall prepare a Construction and Demolition Resource Waste Management Plan (RWMP) as set out in the Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for C&D Projects (2021). The RWMP shall include details of the various waste streams and expected tonnages which will be generated during site clearance, demolition and construction phases and any proposed exportation or importation of soil and stone material including destination/source locations, quantities and if any material will be assessed under By-Product notification. The RWMP shall also include specific proposals as to how the RWMP will be measured and monitored for effectiveness. All records (including for waste and all resources) pursuant to the agreed RWMP shall be made available for inspection at the site office at all times.

Alain Kerveillant

Executive Scientist

Tel: 01-8708461

Mobile: 087-9915832

FINGAL COUNTY COUNCIL INTERNAL CONSULTEE

PLANNING REPORT

Report of the Heritage Officer

Register Reference: LRD0057/S2

Registration Date: 25-Nov-2024

Development: Goldenport Estates Ltd, intend to apply for planning permission for a Large-Scale

Residential Development (LRD) on lands at Forest Road, Swords, Co. Dublin.

The proposed development will consist of a total of 104 no. residential units.

Location: Lands to the west of Forest Road at Forrest Great, directly south of Ridgewood Green, Swords, Dublin

Applicant: Goldenport Estates Ltd

Application Type: LRD Meeting

Report

A desktop report-*Archaeological Impact Assessment Report, Proposed Residential Development at Forest Road, Forrest Great, Swords, Co. Dublin* by Magda Lyne of ACSU Ltd. (dated November 2024) was received with this submission. The site consists of a grassed field and is in proximity to an archaeological monument, Ring Ditch (DU011-119). As these types of monuments often occur in groups and in order to establish an adequate definition of the location and extent of any potential sub-surface remains, the report recommends geophysical survey and archaeological test excavation, in advance of development. Given the relative proximity of the sub-surface monument DU011-119, this can be considered a reasonable approach. The following is required;

- 29 Geophysical survey of the site by a suitably qualified and experienced archaeological geophysicist
- 30 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.
- 31 On completion of the geophysical survey and test-excavation, the archaeologist shall submit a written report including archaeological impact statement, to the Planning Authority and to the Department of Housing, Local Government and Heritage for consideration.

Officer: Christine Baker

Endorsed: _____

Date: 04 December 2024 Date: _____

FINGAL COUNTY COUNCIL INTERNAL CONSULTEE
PLANNING REPORT
Report of Public Lighting

Public Lighting cannot really comment on this LRD at the moment.

There was no information in the documents and drawings provided by the developer for **LRD0057/S2** relating to how they are proposing to light the scheme, their proposed light levels, that they will comply with minimum distance required between lights from trees, protection of proposed lighting infrastructure in home zone areas, or obtrusive light spill, etc.

At the meeting, we noted there are no proposed light positions shown on any of the drawings presented, that there were an awful lot of trees along the roads, with trees shown in every location where any possible lighting positions might be required.

We were also in agreement with Parks about the path to the north of the site, not to be TIC, and we would also not be in favour of lighting this path.

As part of their planning application, we will require them to submit the following:

8.0 TIC drawing.

9.0 Scaled drawing showing the locations of all public lighting columns and section pillars.

10.0 Proposed lighting class and lighting levels to be stated on the drawing.

11.0 Column and luminaire details to be included on the drawing.

12.0 Hinged columns must be used where there is less than 3.5 metres horizontal clearance on a path, or in areas inaccessible to a vehicle-mounted hoist.

13.0 All public lighting infrastructure must be located in public area or areas proposed to be taken in charge.

14.0 All landscaping, trees and traffic calming measures must also be shown on the public lighting drawing.

15.0 The required 7m minimum clearance between trees and public lighting columns must be adhered to.

16.0 The existing public lighting locations at the site entrances and along the site boundary must also be included on the drawing.

17.0 Lighting calculation report preferably in Lighting Reality format, with separate calculation grids for different parts of the site (e.g. overall, paths around open spaces, site entrances, along the main road, home zone areas, etc. Note, all calculation grids must cover back of path to back of path.).

17.1 Luminaire maintenance factor, colour temperature, mounting height, angle of tilt, outreach, and proposed luminaires to be included in the calculation report.

- 17.2 The lighting standard and lighting class the proposed scheme is designed to, must also be stated in the report.
- 18.0 Isolux contour drawing of the proposed lighting levels.
- 19.0 Proposed ducting layout including all access chambers, proposed public lighting section pillars and ESB Networks section pillars.
- 19.1 All public lighting ducting must be in public areas and with the exception of road crossing ducts, they must be located in footpaths.
- 20.0 Product data sheets and drawings of proposed public lighting infrastructure (luminaires, columns, cables, ducting, section pillars, access chambers).
- 21.0 Fingal County Council LED Technical details sheets to be completed for each proposed luminaire.
- With regards to colour temperature of proposed luminaires, . Fingal County Council policy is neutral white except in limited specific circumstances that are to be agreed with Fingal County Council Public Lighting in writing.
- 22.0 Circuit schematics and volt-drop calculations for the proposed circuits are required.
- 23.0 Details of proposed protection measures of how the public lighting infrastructure will be protected in the homezone shared surfaces areas.

Note Items 1-8 will also be required to be resubmitted at compliance stage, to ensure the scheme is being built as agreed.

Regards,

Karen Leeson | Innealtóir Sinsearach Feidhmiúcháin | Senior Executive Engineer

Appendix 1: Section 247 Consultation

Comhairle Contae Fhine Gall
Fingal County Council

**An Roinn um Pleanáil agus
Infrastruchtúr Straitéiseach**
Planning and Strategic
Infrastructure Department



LRD - SECTION 247 PRE-APPLICATION CONSULTATION NOTES

Subject	LRD0057/S1		
Meeting Place	Microsoft Teams		
Date	8 th October 2024		
Time		Start: 14.30p.m.	Finish: 16.00p.m.
Attendees:	Internal	External	
	Jennifer Casserly (FCC)	Annabel Gilmartin	
	Laura Barton (FCC)	David Barrett	
	Solomon Aroboto (FCC)	Declan Foley	
	Gemma Carr (FCC)	Ronan Mac Diarmada	
	Marta Durek (FCC)	Hannah Byrne	
	Shane Comaskey (FCC)	Conor Vaughan	
	Phillip Grobler (FCC)	Donal Duffy	
	Hannah Millar (FCC)	Hannah Byrne	
	Finbarr Quigley (FCC)	Dan Ryan	
	Ellen Giffney (FCC)		
	Jessica Clarke (FCC)		
	Shauna Hughes (FCC)		
	Karen Leeson (FCC)		

	<p style="text-align: center;">Disclaimer</p> <p>Please Note that advice, feedback and opinion offered at consultation is given in good faith and cannot prejudice the determination of a subsequent planning application in accordance with Section 247 of the Planning and Development Act 2000, as amended</p>
Item	Opening
	Presentation of development given:

	<p>Development Description</p> <p>The proposed Large-Scale Residential Development (LRD) provide 105 no. residential units, comprising 33 no. houses of (5 no. 2 bed, 14 no. 3 bed, and 14 no. 4 bed units) in a mix of semi-detached and terraced units; 34 no. Duplex units (17 no. 1 bed and 17 no. 3 bed units); and 38 no. apartments between 2 no. 5 storey apartment blocks (Block A consisting of 5 no. 1 bed and 14 no. 3 bed units and Block B consisting of 5 no. 1 bed and 14 no. 3 bed units). The proposed development will also consist of an ESB substation; public lighting; landscaping, including a new berm to the south, open space and boundary treatment; drainage and engineering works; surface car parking and bicycle parking; along with all associated site development works necessary to facilitate the development.</p> <p>Forest Road, Swords.</p>
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Item	Part V
	<ul style="list-style-type: none"> - Advised the LRD that Part V is applicable at 20% under the affordable housing act 2021. The developer will have to email PartV@Fingal.ie directly to engage into a PartV agreement. - Housing Department would want the units delivered upfront, mix of apartments and houses, Units to be pepper potted around the development. - Relevant Contract Tax 'RCT' applies to payments made by Fingal County Council. - PartV are open to meeting closer to proposal to discuss the costings, site layout plan, drawings, and schedule of accommodation. All of which need to be sent across to the PartV section. <p>PartV@fingal.ie</p>
Item	Transport
	<ul style="list-style-type: none"> • A detailed sightline drawing is required, if removal of hedging is required it should be clearly demonstrated on the drawing. The Transportation Planning Section can provide the exact requirements for sightlines in this type of area if necessary. • In regard to the general layout, the Transportation Planning Section recommends the applicant give further consideration to the following items: <ul style="list-style-type: none"> ○ The 'southern access road' is quite long and straight, and further consideration should be given to how this layout reduces traffic speeds and complies with DMURS guidance. ○ The concept of the pedestrian connectivity running east-west along the northern side of the site is welcome by the Transportation Planning Section, however we would have a preference that it is a shared cycle pedestrian path if appropriate, and that it is uninterrupted/continuous, and that it is lit by public lighting if appropriate. ○ Consideration should be given to the surface treatment in any proposed homezones/shared surfaces, DMURS gives clear guidance as follows: DMURS States (Section 4.3.4) The key condition for the design of any shared surface is that drivers, upon entering the street, recognise that they are in a shared space and react by driving very slowly (i.e. 20km/h or less). To ensure this, designers should: <ul style="list-style-type: none"> • Use a variety of materials and finishes that indicate that the carriageway is an extension of the pedestrian domain (such as paving: see Section 4.2.6 – Materials and Finishes). The Transportation Planning Section has a preference for 'red coloured Stone Mastic Asphalt' in homezones/shared surfaces. DMURS gives guidance that the main surface should be no wider than 4.8m. Consideration should be given to the entry treatment to a homezone/shared surface; potentially continuing the concrete footpath across the entry to the homezone is a potential option, or a

	<p>change in level etc., DMURS gives further guidance on this.</p>
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- Full detailed Roads/Engineering Drawings should be provided; including
 - Details of drainage.
 - Details of levels of roads, kerbs and footpaths.
 - Details of road markings, signage tactile paving.
 - Details of road surface materials.
- A statement of consistency with DMURS should be provided.
- A Stage 1 Road Safety Audit should be carried out and provided.
- A rationale for the carparking proposals should be provided, with regard to the 'Sustainable Residential Development and Compact Settlement Guidelines for Local Authorities' and the Fingal Development Plan Standards. The proposed development is located in 'zone 1'. A dedicated carparking drawing should be provided.
- EV charging should be provided as per the standards of the Fingal Development Plan. The Transportation Planning Section considers that 20% of non-assigned/non-in-curtilage residential carparking spaces should have EV charging facilities.
- Bicycle Park for any unit that does not have direct access to a rear garden must comply with the requirements of the Fingal Development Plan and the 'Sustainable Residential Development and Compact Settlement Guidelines for Local Authorities'.
- The proposed detail for the bicycle parking should make allowance for a variety of bike types and bike users (such as cargo bikes) and the applicant should take guidance from the Chapter 2.3 and Chapter 6 of the Cycle Design Manual published by the NTA.
- The proposed detail of the bicycle parking should comply with the following section of the Fingal Development Plan:

14.17.2.1 Bicycle Parking and Residential Development:

- The quality and quantity of bicycle parking provision in residential developments should encourage residents to adopt cycling as the preferred mode of travel for short trips.
- Cycle parking should be provided within the curtilage or adjacent to the building and should not require the bike to be brought through an internal area.
- Innovative, secure, covered and front of house bicycle parking solutions are required in the design of all new duplex developments and terrace dwellings. Wall bars or rings are not acceptable at the front of a house for long stay bicycle parking. Applications for front of house bicycle parking solutions in existing housing and residential areas and matching these criteria will be supported and encouraged.

- In exceptional circumstances, where cycle parking cannot be provided within the curtilage, bicycle parking that is innovative in design, secure and sheltered must be provided adjacent to the building. Communal on-street bicycle parking provision provides an opportunity in the context of retro-fitting existing terrace dwellings fronting onto streets in existing built-up area and this will form part of the Active Travel Strategy.
- Apartment development must be comprehensively equipped with high quality cycle parking and storage facilities for residents and visitors.
- The provision of high-quality bicycle parking is a key concern for apartment residents and apartment proposals must respond accordingly in their design and provision of such facilities.
- Each apartment unit shall be provided with an individual storage compartment for long-stay bicycle provision that is capable of accommodating bicycles, buggies and additional ancillary equipment such as scooters, helmets and bicycle maintenance equipment.
- Guidance in relation to bicycle parking provision and storage for apartment developments is outlined in the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020. The Council will have regard to these relevant guidelines when considering applications for apartment development where bicycle parking is a requirement
- Section 14.17.2 of the Fingal Development Plan 2023-2029 describes 'long- stay' bicycle parking in the following terms: These are to be designed for private use by residents and employees. Such cycle parking spaces should be located in a secure area that is easy to access, well-lit and covered. Effective security and functionality for all types of users is also maximised by the provision of individual facilities to allow for different types of equipment such as buggies, cargo bikes, helmets and scooters to be stored where appropriate. They should be situated within the curtilage of the destination.
- Section 14.17.2 of the Fingal Development plan 2023-2029 describes 'short- stay' bicycle parking in the following terms: These are designed for ease of use by the general public and visitors to a development. Such bicycle parking spaces should be located in highly visible areas with good passive surveillance, which are easy to access and well lit. They should ideally be situated no further than 15m from main entry points

- The Transportation Planning Section are available to discuss/clarify technical engineering details, such as the sightline requirements and the required kerb and footpath details along the existing public road etc.
- In regard to any Taking in-charge proposals, the applicant is advised to further consider the following points:

	<ul style="list-style-type: none"> ○ The Councils Taking in Charge Policy/Specification Appendix 6 Section 8 states the following: " All roads to be taken in charge will be taken in charge at a minimum from the back of footpath/cyclepath on one side of the road to the back of footpath/cyclepath on the other side of the road in line with the definition of a road in the 1993 Roads Act Part 1 Section 2(1). ○ The consequence of the above point, is that the Councils taking in charge policy, by default, requires all 'non in-curtilage carparking/on-street car parking spaces' located on or directly adjacent to streets/roads proposed to be taken in charge by the Council to <u>not</u> be designated to any particular unit and to become public carparking spaces by default, unless otherwise agreed with the Councils taking-in-charge section. ○ All areas that are proposed to be 'taken in charge' by the Council, should be constructed and maintained to the Councils standards for taking in charge, including roads, footpaths, verges, public lighting, open space, sewers, watermains or drains, forming part of the development. ○ Public infrastructure such as stormwater drainage and streetlighting, should be located in areas to be taken-in-charge by the Council. ○ The applicant is advised to engage with the Councils Taking in Charge Section for any discussion required on the Councils taking in charge requirements, who can be reached at ticesstates@fingal.ie
Item	Water & Drainage
	<p>High level S1 meeting with engineering strategy presented; 3 catchments, including basin on POS and 2 x tanks serving apartment blocks, green/blue roofs on 2 x apartments, permeable paving in-curtilage, etc</p> <ul style="list-style-type: none"> - No flood risk as per SFRA but commensurate SSFRA required - Noted intention to discharge to existing SW within Forest Rd - this sewer does not appear on GIS but is stated to be confirmed with GPR survey and FCC drainage inspector. - SW strategy acceptable but need to be further developed. - PCE send in to IW 8 weeks ago, no reply yet. - Intention to connect to Ridgewood networks to the north , crucial that possibility of gravity foul connection be confirmed as PS will have buffer requirement
Item	Parks & Landscaping
	<p><u>Existing trees and vegetation:</u></p> <p><i>The following information is required to fully assess this proposal:</i></p> <p>Arboricultural Impact Statement Tree Protection Plan</p> <p>The red line boundary line to be shown on the Tree Survey.</p> <p>Clearly show that there is no net canopy loss in relation to the proposed development.</p>

Public Open Space:

Overall Public Open Space requirement is 6,100sq m.

The On-site Public Open Space provision is not accordance with Development Plan standards. It should be noted that the linear open space to the north is not considered Public Open Space in accordance with the Development Plan. It is considered Environmental Open Space in its present narrow width.

The area which is considered Public Open Space is that which the playground is proposed.

Transition between Greenbelt and RS zoning – consider tree and hedgerow planting along this southern boundary.

Play provision requirement:

416 sq m

A minimum of 25m separation distance is required between residential units and the proposed play facility.

Play provision shall not be located in SuDS areas.

Street tree plan

Street tree plan is required. Lamp standards and location of constructed tree pits to be clearly shown (7m separation distance between lamp standards and trees).

Street trees to be included in particular in the western portion of the site.

Landscape plan:

The tree/hedgerow footprint (as shown on the Tree Survey) to be clearly shown on the landscape plan.

Any SuDS features (as shown on the drainage drawings) to be clearly shown on the landscape plan. Slopes 1:5.

Cross sections between the public open space areas to the north (to include houses, road and open space) and the proposed open space / tree /hedgerow area to the south to be provided.

Cross sections to the western, eastern and southern boundaries also to be provided.

Passive Overlooking of green areas

Passive supervision along the northern boundary is critical to design out anti-social behaviour. Ensure that there are no buildings such as bin stores, ESB substations on open space areas (in order to avoid anti-social behaviour).

Taking in charge plan

	Areas to be taken in charge to be outlined using a thin line (as opposed to block colour) There should be no ambiguity of what is private / public either on a drawing or on the ground.
Item	Noise
	<ul style="list-style-type: none"> • No technical report available to date. • The proposed development is situated in Zones B and C of the Dublin Airport Noise Zones as described in the Fingal County Development Plan 2023-2029, so the rules applying to Zone B should be applied across the entire site. • The existing noise environment in the location of the proposed development will make it very challenging to provide residential properties which offer the necessary protection to over-exposure to high levels of noise, particularly at night with windows open. • The existing noise environment will make it particularly challenging to provide quality outdoor amenity areas which do not expose residents to high levels of noise. • It was noted that Wave Dynamics (Acoustics Consultants) have been commissioned to carry out an Inward Noise Assessment which will investigate the suitability of the site for residential development in terms of noise exposure. • The letter from Wave Dynamics referred to the investigation of the impacts of installing a berm along the southern boundary of the site which could act as a barrier to ground noise from Dublin Airport. There was no mention of this berm in any of the other documents already submitted or discussed and the proposal of a berm is concerning.
Item	Planning / Opinion Issues
	<ul style="list-style-type: none"> • Site is zoned RS- Residential and adjoining land is GB- Green Belt zoning and therefore Objective in Development Plan related to Transitional Zone is applicable, whereby the proposal should avoid abrupt transitions in scale and use and to protect amenities of area. Preserving of GB land is critical, and the proposal will need to take cognisance of same. • Proposal of apartments and increased height at road edge is concerning given the rural nature of the road and land to the south. • Onus on applicant that density complies with Settlement Strategy (FDP) and applicable standards of Sustainable Residential Development and Compact Settlements – Guidelines for Planning Authorities. • Given site is within Noise Zone B and C of Dublin Airport, following of Development Plan is relevant;

	<p>-Policy DAP5, DAP6, Objective DA011, Section 14.16.1 Housing within Airport Noise Zones.</p> <p>-Objective DA024- Housing Development and Dublin Airport Zones.</p> <p>Amenity for residents both indoor and outdoor is of concern with distance from airport and noise zones.</p> <ul style="list-style-type: none"> • Townland boundary to be retained and additional trees should be considered along the southern boundary. • In relation to Public Lighting, no information has been provided and a taking in charge map is required. Concern re public lighting and attenuation tanks, bat protection and light pollution. • Connectivity through the site important. • Schedule of Accommodation/Floor Areas to be provided. • Daylight sunlight assessment and shadow analysis may be required. • DMS037 objective - age friendly requirement on the units. • DMS0194 objective - Public art requirement on developments over 100 units. • EIAR/NIS requirements to be fulfilled. • Social Infrastructure audit • Energy statement • Provision of Childcare facility important
	Comments
END	Meeting concluded 16.00p.m.

Appendix 2: Section 32C

Comhairle Contae Fhine Gall
Fingal County Council

**An Roinn um Pleanáil agus
Infrastruchtúr Straitéiseach**
Planning and Strategic
Infrastructure Department



RECORD OF SECTION 32C - LRD MEETING

Pre-Application Reference Number	LRD0057/S2 Lands to the west of Forest Road at Forrest Great, directly south of Ridgewood Green, Swords, Dublin		
Meeting Type	Section 32C LRD Meeting		
Date	18-12-2024	Start Time	15:00
Location	Teams	End Time	16:30
Chairperson	Jennifer Casserly- Executive Planner – Planning		

Representing Fingal County Council

Solomon Aroboto – Senior Executive Planner – Planning
Marta Durek - Assistant Parks and Landscape Officer
Annamarie Pretorius - Senior Executive Architect
Finbarr Quigley – Executive Scientist – Environment-Air & Noise
Rebecca Walsh – Executive Scientist – Environment
Alain Kerveillant – Executive Scientist – Environment-Waste
Jennifer Casserly – Executive Planner – Planning
David Devine – Senior Executive Engineer – Water Services
AnnaMarie Meagher - Executive Parks and Landscape Officer
Shauna Hughes - Senior Staff Officer – Housing
Karen Leeson - Senior Executive Engineer – Public Lighting
John Daly - Senior Engineer - Environment
Christine Baker – Heritage (Absent – Sent report)
Shane Comaskey – Executive Engineer - Transport
Nico Regadera - Assistant Staff Officer - Large Scale Residential Developments

Representing Prospective Applicant

Annabel Gilmartin - Crawford Architecture-Architect for Project
Conor Vaughan - Barrett Mahony Consulting Engineers-Project Engineer
David Barret - Goldenport Homes-Applciant
Donal Duffy – DOWNEY-Planner-Planning Consultant for Project
James Cousins - Wave Dynamics-Acoustic Consultant

INTRODUCTION

The Chairperson welcomed the prospective applicant and introductions were made.

The procedural matters relating to the meeting were as follows:

- Fingal County Council shall keep a record in writing of the meeting including a copy of the request for the meeting and accompanying documents and the names of those who participated. A copy of the record shall be placed and kept with the documents to which any application in respect of that proposed development relates. This record shall only be made public when a planning application in respect of the proposed development is made in accordance with section 34.
- The consultation meeting will not involve a merits-based assessment of the proposed development,
- The meeting will focus on key site-specific issues at strategic overview level, and whether the documents submitted require further consideration and/or amendment in order to constitute a reasonable basis for an application.
- Key considerations will be examined in the context of the statutory development plan for the area and section 28 Ministerial Guidelines where relevant.
- A reminder that neither the holding of an LRD Meeting or the forming of an opinion shall prejudice Fingal County Council in relation to any other of their respective functions under the Planning Acts or any other enactments and cannot be relied upon in the formal planning process or in legal proceedings.
- The Chairperson acknowledge the letter dated 25th November 2024 formally requesting to hold an LRD Meeting.
- No verbatim recording of the meeting by the use of recording equipment or a stenographer is permitted.
- Fingal County Council will issue its LRD Opinion within the period of 4 weeks from this date.

The Meeting Agenda is as follows:

1. Housing
2. Transport

3. Parks & Open Space
4. Water Services
5. Environment – Waste
6. Architects
7. Environment – Air & Noise
8. Heritage (In Absent)
9. Public Lighting
10. Planning

Agenda Item 1 - **Housing**

Fingal County Council comments:

Part V proposal submitted, however requested to review the proposal as per Fingal County councils' development plan 2023-2029, to ensure that 30% of the Part V units are universal designed and that 10% of the entire residential development should be age friendly accommodation. A revised Part V proposal to be submitted.

Agenda Item 2 - **Transport**

Fingal County Council Comments

General

The proposed development is located in an area with a 80km/hr speed limit, which transitions to a 50km speed limit at a location circa 100m to the north of the proposed new vehicular entrance.

Access/Sightlines

A detailed sightline drawing should be provided for the vehicular entrance onto the Forest Road, demonstrating sightlines as per the requirements of DN-GEO-03060 (as published by Transport Infrastructure Ireland (TII)) and DMURS.

The Transportation Planning has no issue with the general principle of the location of the proposed vehicular entrance.

Car Parking

In regard to the Sustainable Residential Development and Compact Settlement Guidelines for Local Authorities; the site is within 500m walking distance of the proposed Bus Connects radial routes 22 (peak hour frequency 15mins) and L81(peak hour frequency 20mins), which combined, would provide a frequency of circa 10 minutes; and circa 1.5km from the A4 route which has a frequency of 12 minutes; and also within circa 1.7km walking distance of the planned Metro Station. We consider that this would place the site in an 'Accessible' location as defined in table 3.8 of the 'Compact Settlement Guidelines'; and SPPR 3 states 'In 'accessible' locations, defined in Chapter 3 (Table 3.8) car-parking provision should be substantially reduced, the maximum rate

of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.

The Fingal Development Plan 2023-2029 creates two distinct parking zones to ensure adequate residential parking provision and the control of destination car parking. This approach also allows greater flexibility in the application of car parking standards on sites in areas with varying levels of road and public transport provision. The car parking requirements for 'Zone 1' are maximums. The proposed development is generally within a 1.6km radius of the Bus Connects Core Bus Corridor and the Metro Station, which would place the proposed development in 'zone 1', which would place a carparking requirement on the development of maximum 1 car parking space per 3+- bedroom unit, and 0.5 spaces per 1-2 bedroom unit; in regard to the standards of the Fingal Development Plan.

It should be noted that the standards of the 'Sustainable Residential Development and Compact Settlement Guidelines for Local Authorities' takes precedence over the standards of the Fingal Development Plan.

The approach taken to the quantity of carparking appears to generally align with the Fingal Development Plan Standards for 'Zone 1' and the 'Sustainable Residential Development and Compact Settlement Guidelines for Local Authorities'; however, we recommend that a dedicated carparking drawing be developed to clearly outline the proposed carparking strategy and identify which carparking spaces are assigned to which use/block.

Bicycle Parking

The proposed development would provide on-curtilage bike stores for mid terrace houses and duplex units; and this approach is generally acceptable in principle; however, the information submitted is lacking and the detail and layout should be further considered and developed.

The approach taken to the bicycle parking for the apartment blocks is generally acceptable in principle.

We recommend that the applicant give further consideration to ensuring that the development management company/owners management company would provide that the cycle parking areas are subject of a funded maintenance regime that ensures that facilities are kept clean, free of graffiti, well-lit and the parking equipment will be properly maintained.

Layout

The applicant has provided a detailed statement of consistency with DMURS; and the approach taken is generally acceptable in principle.

We recommend that the applicant give further consideration to the following, and amend the layout where necessary:

- We recommend that the exact location of the 'pedestrian link into adjacent open space', as shown on the 'proposed site layout plan' should be given further consideration in regard to the layout of the adjacent existing development to the north, to ensure its suitably located to allow for a future uninterrupted pedestrian connectivity link.
- We have a strong preference that a verge and street trees would be provided between the southern access road edge and the southern boundary wall/fence, along the main internal access road along the southern boundary of the site; this would be beneficial to ensure a safe distance between the road carriageway and hard edge; and would also help screen the proposed development from the potential future road objective directly adjacent to the south.
- We recommend that the applicant give further consideration to the layout of the pedestrian route/greenway that runs east-west on the northern side of the site, to provide continuous uninterrupted connectivity; and also to give consideration to providing this route as a shared cycle /pedestrian route (as per the design of the NTA Cycle Design Manual).
- We recommend that the applicant give further consideration to the layout of the main internal access road along the southern boundary of the site, from the perspective of DMURS, to help calm the traffic and along the straight section of road.
- We recommend that the applicant give further consideration to the 'entry treatment' to the 'shared surface/homezones'; taking cognisance of the 'NTA Active Travel Guidance Note on Junction Tightening Schemes'; and DMURS Advice Note 6 - Priority Junction Tightening Measures.
- We recommend that the applicant give further consideration to the road carriageways in the 'shared surface/homezones', which should ideally have a different surface colour from the other standard road carriageways, such as a red asphalt surface (we can provide the acceptable FCC specification for the material). There is clear advice on this in DMURS.
- We recommend that the applicant give further consideration to the layout of the specific cul-de-sac/'homezone' located second from the western side (i.e. the street between 'zone c' and 'zone D'), which is dominated by perpendicular parking on both sides. The applicant could consider 'breaking-up' the parking dominance by potential introduction of a landscaping strip, or potentially providing parallel parking on one side and perpendicular on the other (as is recommended in DMURS) and the applicant should also take cognisance of page 121 of DMURS (section 4.4.9) which describes dimensions for carparking, and may need to consider making the carparking bays wider (i.e. potentially

2.6m in this scenario) in order to allow cars to be able to exit/enter the spaces in one movement.

- We recommend that the applicant give further consideration to demonstrating that the dimensions of the carparking spaces is sufficient and that they comply with the DMURS guidance, and Part M at house entrances, where necessary.
- We recommend that the applicant give further consideration to the detail where parking spaces with permeable paving is located directly adjacent to road carriageways, with consideration for a construction detail preventing the road build up being undermined by surface water should be considered.

Public Lighting

The Transportation Planning has a preference that all footpath/greenway routes are sufficiently illuminated with public lighting, however we note that there may be some ecological/green infrastructure issues to be considered in regard to location of lighting.

Road Safety Audit

A Stage 1 Road Safety Audit must be provided, carried out by an independent 3rd party, in compliance with the TII Publication 'Road Safety Audit GE-STY-01024'. It should ideally be carried out on the final layout proposed/intended for planning permission submission.

Swept Path Analysis/Emergency Vehicles Access

A swept path analysis has been included for a fire tender and a refuse collection vehicle.

Taking in-charge

The applicant has provided a drawing titled 'Taking in Charge'; which highlights the areas that the applicant proposes to be taken in charge by the Council. The layout generally appears to be acceptable in principle; however, the applicant is advised to take cognisance of the following points:

- The Councils Taking in Charge Policy/Specification Appendix 6 Section 8 states the following: " All roads to be taken in charge will be taken in charge at a minimum from the back of footpath/cycle path on one side of the road to the back of footpath/cyclepath on the other side of the road in line with the definition of a road in the 1993 Roads Act Part 1 Section 2(1).
- The consequence of the above point is that the Councils taking in charge policy, by default, requires all 'non in-curtilage carparking/on-street car parking spaces' located between the footpath and road carriageway proposed to be taken in charge by the Council, could not be designated to any particular unit and would become public carparking spaces.

- All areas that are proposed to be 'taken in charge' by the Council, should be constructed and maintained to the Councils standards for taking in charge, including roads, footpaths, verges, public lighting, open space, sewers, watermains or drains, forming part of the development.
- Permeable asphalt surface and road structural build-up does not meet the Councils standards for taking in charge, and its use would likely preclude a road from being taken in charge.
- Public infrastructure such as stormwater drainage and streetlighting, should be located in areas to be taken-in-charge by the Council.

Electric Vehicle (EV) charging

The applicant should address Section 14.17.10 of the FDP 2023-2029; which describes that all of the 'non-in-curtilage/on-street' residential carparking spaces (i.e. that don't have access to provide their own EV charging infrastructure) shall incorporate functioning EV charging points at a minimum rate of 20% of the proposed parking spaces, and appropriate infrastructure (e.g. ducting) to allow for future fit out of a charging points at the remaining 80% of residential non-in-curtilage/ on-street parking spaces. Publicly accessible EV parking spaces shall be clearly marked and be capable of communicating usage data with the National Charge Point Management System. EV parking spaces for accessible spaces shall also be included in the development where these exist.

Setbacks/Reservation for County Development Plan Objectives

The Fingal Development Plan 2023-2029 contains the following policy and objectives which would support the provision of development setbacks in order to provide future road upgrades:

- Objective DMSO116 – Provision of Building Setbacks – 'Seek to provide appropriate building setbacks along the road network to facilitate future road improvements.'
- Objective CMO6 – Improvements to the Pedestrian and Cyclist Environment.
- Objective CMO13 – Walking and Cycling Network and Tourist Trails.
- Policy CMP1 –Decarbonisation of Motorised Transport.
- Policy CMP7 – Pedestrian and Cycling Network.

Forest Road is designated as a future 'secondary' cycle route in the Greater Dublin Area Cycle Network Plan published by the National Transport Authority. The Fingal Development Plan Map Sheet No.8 also contains an indicative cycle route along this stretch of Back Road. There is no route location or design in place for this future route.

From a site visit it was observed that the existing road carriageway has a width of circa 6m, with a circa 1m wide grass verge on both sides of the road. (i.e an overall existing road width of circa 8m.) The land directly opposite is also zoned residential.

Directly to the north of the site (circa 40m), the road carriageway width widens to circa 7-7.5m with a 1.5m wide verge, a 1.4m wide cycletrack and 1.5m wide footpath on the northern side; and no infrastructure on the southern side.

A further circa 45m north, there is also pedestrian and cycle facilities on the opposite side of the road, consisting of a 1.3m wide grass verge, a 1m wide cycletrack and 1.2m wide footpath.

The Transportation Planning Section considers that the applicant should provide an offset of the site boundary fence of circa 5.5m measured from the existing road carriageway edge; to allow for the delivery of the following:

- A widened road carriageway, 0.5m
- A 1m wide grass verge
- A 2m wide cycle lane
- and a 2m wide footpath.

Conclusion

The Transportation Planning Section recommends that the applicant give further consideration to the following items, and amend the layout and details where necessary:

8. In regard to the general layout, the Transportation Planning Section recommends that the applicant give further consideration to the following, and amend the layout where necessary:

32 We recommend that the exact location of the 'pedestrian link into adjacent open space', as shown on the 'proposed site layout plan' should be given further consideration in regard to the layout of the adjacent existing development to the north.

33 We have a strong preference that a verge and street trees would be provided between the road edge and the southern boundary wall/fence, along the main internal access road along the southern boundary of the site; this would be beneficial to ensure a safe distance between the road carriageway and hard edge; and would also help screen the proposed development from the potential future road objective directly adjacent to the south.

34 We recommend that the applicant give further consideration to the layout of the pedestrian route/greenway that runs east-west on the northern side of the site, to provide continuous uninterrupted connectivity.

- 35 We recommend that the applicant give further consideration to the layout of the main internal access road along the southern boundary of the site, from the perspective of DMURS, to help calm the traffic and along the straight section of road.
- 36 We recommend that the applicant give further consideration to the 'entry treatment' to the 'shared surface/homezones'; taking cognisance of the 'NTA Active Travel Guidance Note on Junction Tightening Schemes'; and DMURS Advice Note 6 - Priority Junction Tightening Measures.
- 37 We recommend that the applicant give further consideration to the road carriageways in the 'shared surface/homezones', which should ideally have a different surface colour from the other standard road carriageways, such as a red asphalt surface (we can provide the acceptable FCC specification for the material). There is clear advice on this in DMURS.
- 38 We recommend that the applicant give further consideration to the layout of the specific cul-de-sac/'homezone' located second from the western side (i.e. the street between 'zone c' and 'zone D'), which is dominated by perpendicular parking on both sides. The applicant should consider 'breaking-up' the parking dominance by potential introduction of a landscaping strip, or potentially providing parallel parking on one side and perpendicular on the other (as is recommended in DMURS) and the applicant should also take cognisance of page 121 of DMURS (section 4.4.9) which describes dimensions for carparking, and may need to consider making the carparking bays wider (i.e. potentially 2.6m in this scenario) in order to allow cars to be able to exit/enter the spaces in one movement.
- 39 We recommend that the applicant give further consideration to demonstrating that the dimensions of the carparking spaces is sufficient and that they comply with the DMURS guidance, and Part M at house entrances, where necessary.
- 40 We recommend that the applicant give further consideration to the detail where parking spaces with permeable paving are located directly adjacent to road carriageways, with consideration for a construction detail preventing the road build up being undermined by surface water should be considered.
9. We recommend that a dedicated carparking drawing be developed to clearly outline the proposed carparking strategy and identify which carparking spaces are assigned to which unit/block.
10. We recommend that the applicant give further consideration to the proposed footpath and boundary setback along Forest Road as follows:
- A new concrete kerb along the entire length of road carriageway fronting the proposed development, with associated drainage gullies to drain into the existing surface water infrastructure on Forest Road.

- A 1.5m wide grass verge (a 1m wide verge is generally required, in this case we require an additional 0.5m to allow for future potential widening of the road carriageway)
- A 2m wide cycletrack.
- A 2m wide footpath.

11. A stage 1 Road Safety Audit, carried out by an independent 3rd party, in compliance with the TII Publication 'Road Safety Audit GE-STY-01024' should be provided. It should ideally be carried out on the final layout proposed/intended for planning permission submission.

12. We recommend that the applicant give further consideration to providing the fully developed layout and details of the bicycle parking provision for mid-terrace units and duplex units.

13. The applicant should address Section 14.17.10 of the Fingal Development Plan 2023-2029; which describes that all of the 'non-in-curtilage/on-street' residential carparking spaces (i.e. that don't have access to provide their own EV charging infrastructure) shall incorporate functioning EV charging points at a minimum rate of 20% of the proposed parking spaces, and appropriate infrastructure (e.g. ducting) to allow for future fit out of a charging points at the remaining 80% of residential non-in-curtilage/ on-street parking spaces. Publicly accessible EV parking spaces shall be clearly marked and be capable of communicating usage data with the National Charge Point Management System.

14. The Transportation Planning Section has a strong preference that the pedestrian/greenway routes are sufficiently illuminated with public lighting, and coordination with the requirements of the Councils Public Lighting Section, the Parks and Green Infrastructure Division, and Ecologist may be required.

Agenda Item 3 – **Parks and Open Space**

Fingal County Council Comments

Existing trees and vegetation:

The following information is required to fully assess this proposal:

Hedgerow along the north boundary is a townland boundary; therefore, as per Objective DMSO128 & Objective SPQHO91 of Fingal's County Development Plan, a management plan should be provided to retain the hedgerow's historic value as a townland boundary.

The applicant is requested to show how the townland boundary hedgerow to the north of the site will be maintained and provided with supplementary planting to retain the hedgerow's historic value as a townland boundary.

An Arboricultural Method statement is required.

Objectives *DMSO125* and *DMSO126* of the Development Plan 2023-2029 relate to the protection of existing trees and hedgerows.

Objective DMSO125 – Management of Trees and Hedgerows

Protect, preserve, and ensure the effective management of trees and groups of trees and hedgerows.

Objective DMSO126 – Protection of Trees and Hedgerows during Development.

Ensure during the course of development, trees and hedgerows that are conditioned for retention are fully protected in accordance with BS5837 2012 Trees in relation to the Design, Demolition and Construction – Recommendations or as may be updated and are monitored by the appointed arboriculture consultant.

Objective DMSO128 – Demarcation of Townland Boundaries.

Ensure trees, hedgerows and other features which demarcate townland boundaries are preserved and incorporated where appropriate into the design of developments.

Objective DMSO172 – Protection of Historic Townland Boundaries.

Avoid detrimental impacts on historic townland boundaries. Should an historic townland boundary or section thereof be impacted a survey and photographic record should be undertaken prior to removal.

Public Open Space:

Overall Public Open Space requirement is 6,100sq m.

The on-site public open space provision requires further work as the extent of SUDS within the open space is unknown.

The location of the proposed detention basin will inform where the paths and play area will be located.

The Landscape Rationale Document should be revised to clearly show the linear open space to the north as Environmental Open Space.

The proposed pedestrian link between the subject site along the northern boundary into Ridgewood Green needs further consideration. Its current location does not link to existing paths in the adjacent site.

The pathway running east to west along the northern boundary should be continuous and not broken up, the applicant needs to discuss the layout of this path with the arborist & landscape Architect as the route is in a “no dig zone”.

The proposed trees along the road boundary need to be removed from the landscape plan to facilitate sightlines.

Transition between Greenbelt and RS zoning – the applicant has not shown hedgerow planting along this southern boundary as requested.

A clear statement and drawing are required detailing the proposed Public Open Space provision in accordance with Development Plan standards(refer to table 4.2 of development plan). The statement should directly relate to a drawing which indicates the proposed Open Space provision shown in square metres.

This drawing should show the following in square metres:

- Public Open Space
- Private/Communal Open Space
- Environmental open space
- Proposed SuDS on Open Space areas

In this regard, it is important that Public Open Space is usable and that the central area is of large enough a scale to accommodate natural play / kickabout etc.

The applicant must therefore clearly demonstrate how it is proposed to meet Development Plan standards in terms of Public Open Space provision (Table 4.2 of the Development Plan). The Development Plan objectives specifically to be referred include the following:

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 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 DMSO17 – Location of New Utility Structures

Where possible, new utility structures such as electricity substations and telecommunication equipment cabinets should not be located adjacent or forward of the front building line of buildings or on areas of open space.

Play provision requirement:

416 sq m

A minimum of 25m separation distance is required between residential units and the proposed play facility.

Play provision shall not be located in SuDS areas.

If the applicant cannot provide play equipment as per Objective DMSO68 – *Playground Facilities within Residential Development*, in regards to the minimum separation distance of 25m between residential units and play equipment not being achieved as outlined in Fingal County Councils Play Policy “*A Space for Play*”, a contribution in lieu of play provision will be sought.

Street tree plan

Street tree plan is required. Lamp standards and location of constructed tree pits to be clearly shown (7m separation distance between lamp standards and trees).

Landscape plan:

The tree/hedgerow footprint (as shown on the Tree Survey) to be clearly shown on the landscape plan.

Any SuDS features (as shown on the drainage drawings) to be clearly shown on the landscape plan. Slopes 1:5.

Cross sections between the public open space areas to the north (to include houses, road and open space) and the proposed open space / tree /hedgerow area to the south to be provided.

Cross sections to the western, eastern and southern boundaries also to be provided.

Passive Overlooking of green areas

Passive supervision along the northern boundary is critical to design out anti-social behaviour.

Ensure that there are no buildings such as bin stores, ESB substations on open space areas (in order to avoid anti-social behaviour).

Taking in charge plan

Areas to be taken in charge to be outlined using a thin line (as opposed to block colour) There should be no ambiguity of what is private / public either on a drawing or on the ground.

Agenda Item 4 – Water Services

Fingal County Council Comments

Flood risk: No objection.

The applicant has submitted a site-specific flood risk assessment in accordance with the OPW Guidelines, prepared by Barrett Mahony Consulting Engineers. The assessment concludes that the proposed development is classified as 'highly vulnerable' but completely located within Flood Zone C (ie <0.01% AEP) and is therefore permissible.

Foul drainage: Uisce Eireann.

The applicant has submitted a Pre-connection Enquiry to Uisce Eireann on 26th July 2024. Confirmation of Feasibility is still awaited.

It is proposed to connect into an existing 225mm diameter gravity sewer at the entrance to Ridgewood estate from the Forest Road. Levels however tentatively indicate that pumping would be required – this has also been flagged during the Stage 1 meeting but has not yet been confirmed. In the event that a pumping station is indeed required a minimum buffer zone of 35m is required in accordance with IUO7 of the CDP and this will necessitate significant re-design of the current layout.

Surface water drainage: No objection subject to:

The surface water drainage strategy is generally acceptable and in accordance with the principles of the GDSDS. The applicant proposes to connect into an existing surface water system in Forest Road. However a number of detailed design issues require clarification, as follow;

41 The applicant is requested to confirm whether a ground investigation has been carried out and to include this report with any further submission. This should be used to inform the surface water drainage strategy and indeed to affirm any assumptions that have been made with regards to permeability, groundwater, SOIL value used in the Qbar calculation, etc.

42 The site has been divided into two catchment areas. The report contains anomalies regarding site areas and discharge rates which need to be homogenised throughout, such as:

42.1 Qbar has been calculated as 10.86 l/s however the proposed total is $7.91 + 3.75 = 11.66$ l/s.

42.2 The sum of the two catchments equal 2.29ha whereas the site is stated to be 2.145ha.

42.3 The calculations also refer to a flow controlled to 4.8 l/s whereas this is elsewhere in the report referenced as 3.75 l/s.

42.4 The applicant is requested to clarify the positively drained site area.

43 The detention basin system located with the open space need to be developed and details provided such as depth, side slopes, depth of water, freeboard, etc. Sections must be provided to visually demonstrate its characteristics and appearance in the context of the wider land/streetscape.

44 The attenuation tank system located within the homezone area of the apartment buildings will not be Taken-in-Charge. The applicant is requested to submit a TiC drawing reflecting this.

45 The proposed outfall sewer to which the applicant intends to connect into appears to incorporate an attenuation function. The applicant's site may or may not have been allowed in the design of this system and any additional discharge (even at Qbar) may result in surcharging the system and increasing flood risk elsewhere. It is noted that the system discharges into the Sluice river traversing Forrest Fields Golf Course which has been mapped as flood zone areas in the FEMFRAMS study.

Water supply: Uisce Eireann.

The applicant has submitted a Pre-connection Enquiry to Uisce Eireann on 26th July 2024. Confirmation of Feasibility is still awaited.

It is proposed to connect to an existing watermain in Forest Road fronting the proposed development.

Agenda item 5 - Environment – Waste

Fingal County Council Comments

- An operational waste management plan will be required to be prepared if the development proceeds. OWMP to be prepared as follows:
 - a) OWMP to estimate the waste generation from the development using “BS5906:2005 Waste Management in buildings – Code of Practice” – household waste to be calculated separate from commercial waste and kept separate for collection
 - b) Volume of waste generated split into various waste streams: mixed dry recyclables, glass, food waste, mixed residual waste.
 - c) Detailed drawings of Waste Storage Areas for apartments showing the layout of the bins – demonstrating WSA size is suitable for quantity of waste generated.
 - d) Waste Storage Area design to follow considerations provided in sections 4.8 and 4.9 of “Sustainable Urban Housing: Design Standards for New Apartment”, Dec 2020.
 - e) for individual dwellings not having side access to back garden (ie. Mid terrace), details of where the 3 bins will be stored to the front of the property.
- If granted permission, a condition seeking a C&D Resource Waste Management Plan will be sought:

Prior to the commencement of development, the applicant shall prepare a Construction and Demolition Resource Waste Management Plan (RWMP) as set out in the Best Practice Guidelines for the Preparation of Resource and Waste Management Plans for C&D Projects (2021). The RWMP shall include details of the various waste streams and expected tonnages which will be generated during site clearance, demolition and construction phases and any proposed exportation or importation of soil and stone material including destination/source locations, quantities and if any material will be assessed under By-Product notification. The RWMP shall also include specific proposals as to how the RWMP will be measured and monitored for effectiveness. All records (including for waste and all resources) pursuant to the agreed RWMP shall be made available for inspection at the site office at all times.

Agenda item 6 – **Public Lighting**

Fingal County Council Comments

Public Lighting cannot really comment on this LRD at the moment.

There was no information in the documents and drawings provided by the developer for LRD0057/S2 relating to how they are proposing to light the scheme, their proposed light levels, that they will comply with minimum distance required between lights from trees, protection of proposed lighting infrastructure in home zone areas, or obtrusive light spill, etc.

At the meeting, we noted there are no proposed light positions shown on any of the drawings presented, that there were an awful lot of trees along the roads, with trees shown in every location where any possible lighting positions might be required.

We were also in agreement with Parks about the path to the north of the site, not to be TIC, and we would also not be in favour of lighting this path.

As part of their planning application, we will require them to submit the following:

24.0 TIC drawing.

25.0 Scaled drawing showing the locations of all public lighting columns and section pillars.

26.0 Proposed lighting class and lighting levels to be stated on the drawing.

27.0 Column and luminaire details to be included on the drawing.

28.0 Hinged columns must be used where there is less than 3.5 metres horizontal clearance on a path, or in areas inaccessible to a vehicle-mounted hoist.

29.0 All public lighting infrastructure must be located in public area or areas proposed to be taken in charge.

30.0 All landscaping, trees and traffic calming measures must also be shown on the public lighting drawing.

31.0 The required 7m minimum clearance between trees and public lighting columns must be adhered to.

32.0 The existing public lighting locations at the site entrances and along the site boundary must also be included on the drawing.

2. Lighting calculation report preferably in Lighting Reality format, with separate calculation grids for different parts of the site (e.g. overall, paths around open spaces, site entrances, along the main road, home zone areas, etc. Note, all calculation grids must cover back of path to back of path.).

- Luminaire maintenance factor, colour temperature, mounting height, angle of tilt, outreach, and proposed luminaires to be included in the calculation report.
- The lighting standard and lighting class the proposed scheme is designed to, must also be stated in the report.

3. Isolux contour drawing of the proposed lighting levels.
4. Proposed ducting layout including all access chambers, proposed public lighting section pillars and ESB Networks section pillars.
 - All public lighting ducting must be in public areas and with the exception of road crossing ducts, they must be located in footpaths.
5. Product data sheets and drawings of proposed public lighting infrastructure (luminaires, columns, cables, ducting, section pillars, access chambers).
6. Fingal County Council LED Technical details sheets to be completed for each proposed luminaire.
 - With regards to colour temperature of proposed luminaires, . Fingal County Council policy is neutral white except in limited specific circumstances that are to be agreed with Fingal County Council Public Lighting in writing.

33.0 Circuit schematics and volt-drop calculations for the proposed circuits are required.

34.0 Details of proposed protection measures of how the public lighting infrastructure will be protected in the homezone shared surfaces areas.

Note Items 1-8 will also be required to be resubmitted at compliance stage, to ensure the scheme is being built as agreed.

Agenda item 7 - **Architects**

Fingal County Council Comments

- 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 behavior and the rear gardens themselves may also become targets due to their exposure. Consider reorientating dwellings to have the entrances and/or living spaces or windows from active rooms (e.g., kitchens, living rooms) overlooking the open space, and limit the extent rear garden boundaries.
- Apartments - The height of the 5 storey apartment blocks seems excessive at the edge of Swords, particularly near the road, causing visual and contextual challenges. Consider reducing the building height to the south with stepped

forms or recessed upper floors, and reassess the proximity to the road to reduce the perceived mass.

- Apartments - Please reconsider the extent of fully protruding clip-on balconies - the building shape provides an opportunity to provide semi-recessed balconies to the corners without compromising daylight.
- Provide more detail on the proposed finishes, which should include a variety of materials and textures.
- The position of the units in Zone B directly on the boundary with the lands to the south (Greenbelt) is not appropriate, please consider introducing a landscaped buffer or other separation, and reorientate these units with entrances and/or living spaces or windows from active rooms (e.g., kitchens, living rooms) overlooking the lands to the south.
- Part V units - 30% to be adaptable/UD - the current layout with relatively narrow bedrooms will not support wheelchair accessibility, and it is recommended that this is review to ensure compliance with universal design standards.
- Mid-terrace houses - Provide updated elevations showing the placement of bin and bike stores in relation to the window to the front facade, to demonstrate that they do not obstruct the windows.
- General - Include a dedicated storage area near the main entrance of all unit types for coats and outdoor essentials and ensure that additional storage is accessible from other main circulation spaces. Please also allocate sufficient dedicated space for water storage, heating, and ventilation plant/equipment in addition to the minimum required storage provisions for each dwelling type.

Agenda item 8 - **Environment – Air & Noise**

Fingal County Council Comments

- Regarding the modelling of noise impacts, the applicants are requested to clarify what assumptions are made for the modelling of aircraft noise on the site and to provide separate results (drawings) showing the predicted impacts from aircraft and road noise on the site at the 3 heights already used.
- Further details on the source of the night-time Maximum Noise Events. Are they due to Aircraft or Road sources?
- Query on whether the buildings on the eastern side can be orientated to have balconies facing away from the road noise source.

- Further details on the noise barrier walls proposed for the site to include locations, dimensions, construction materials to be used and final finishes.

Agenda Item 9 – **Heritage (In Absent)**

Fingal County Council Comments

- 46 Geophysical survey of the site by a suitably qualified and experienced archaeological geophysicist.
- 47 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.
- 48 On completion of the geophysical survey and test-excavation, the archaeologist shall submit a written report including archaeological impact statement, to the Planning Authority and to the Department of Housing, Local Government and Heritage for consideration.

Agenda item 10 - **Planning**

Fingal County Council Comments

Open space shall be level and cross sections of same submitted. Further consideration for the proposed southern boundary needs to be explored.

Full details of proposed green belt and development boundaries should be illustrated and submitted. No proposal for public lighting has been submitted.

Development built onto the boundary (Zone B) is not acceptable and should be reconfigured.

The proposed apartments should be reduced in height, scale and mass given the overbearing nature of the proposal at the entrance to the site and transition from rural green belt to residential development.

The two apartment blocks and in particular clip-on balconies, etc should improve aesthetically. In terms of overall development and mix of tenure, there is a lack of mix of finishes. Better design solutions should be in place as per example in Churchfield Dublin 15.

Need elevations and details on proposed acoustic fence which principally the Planning Authority are not in favour of.

Development looks very abrupt transitioning from green belt to residential area and needs improvement.

All details discussed in the meeting with the different consultee departments need to be taken into consideration if going forward with full application.
Due diligence with AA and EIA.