

D C W N E Y

29 Merrion Square, D02RW64

STATEMENT OF RESPONSE TO LRD OPINION

**Proposed Large-scale Residential
Development**

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

Applicant: Golden Port Homes Limited

June 2025

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1.0 INTRODUCTION

DOWNEY, Chartered Town Planners, 29 Merrion Square, Dublin 2, D02 RW64, have prepared this Statement of Response to Fingal County Council's LRD Opinion, on behalf of our client and the applicant, Golden Port Homes Limited. This statement is 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 provided 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;*

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".

Following consultation with Fingal County Council under Section 247 of Planning and Development Act, 2000 (as amended), on the 25th November 2024, a Section 32(B) LRD Pre-Planning Meeting Request was submitted to the Planning Authority. On the 18th December 2024, a Section 32(C) LRD Pre-Planning Meeting was held between the applicant and Fingal County. Fingal County Council then issued their pre-application consultation LRD Opinion on the proposed development, under case reference: LRD0057/S2.

The Opinion Letter states that: *"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."*

The Statement now sets out a response to Fingal County Council's LRD Opinion. This statement of response should be read in conjunction with all drawings and documentation submitted as part of this Large-scale Residential Development (LRD) planning application.

2.0 RESPONSE TO LRD OPINION

Within Section 8.0 of the LRD Opinion, the Fingal County Council confirmed: *"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."*

Section 9.0 of the LRD Opinion states: *"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:"*

Below is an overview of the Design Team's responses, to that of the noted points for which have been prepared in tandem with relevant drawings and documentation entailed in the LRD application pack.

Please note: the following sections presents a summary of the Council's opinion laid out in italic text, followed by the Applicant's response.

Section 1.0 (Planning and Design)

2.1 ITEM NO. 1.1

Design and Layout

FCC Opinion: *Further consideration is needed regarding the size and visual impact of the proposed five-storey apartment blocks on the eastern part of the site, particularly due to its rural setting next to Green Belt land. Concerns include the building's height, design, roofline, and prominent cantilevered balconies. It's recommended that the applicant reduce the building height or recess upper floors, and reassess its distance from the road to lessen its visual dominance. The building's shape also allows for semi-recessed corner balconies without affecting daylight access.*

Applicant's Response:

In response to this, further consideration of the overall site layout and form was carried out by the applicant and design team. The inclusion of the distributor road as a main access route to the scheme, and the introduction of a large public park on the GB zoned lands, which are located to the south of Block A, facilitated a reimagining of the overall layout and appearance of the proposed development. An increased buffer is now provided between Block A and the edge of the subject site.

Block A was also redesigned and reduced in height from 5 storeys to 4 storeys and the previously proposed cantilevered balconies have been internalised/integrated into the footprint of the block. The height and transition in scale of the scheme is such that it is taller on the northern part of the site, i.e. Block B will be 5 storeys as it adjoins the existing apartments to the north and Block A steps down to

4 storeys as it addresses the less developed area to the south. Block A has also been reorientated so that it now better addresses the access/distributor road to the south.

The roof profile of the apartment blocks is materially different from what was proposed at Pre-Planning Consultation Stage with the upper floor now designed with a different palette of material. The upper floors of the apartment blocks have also been recessed from the building edge, which further reduces the overall bulk and appearance of height of the scheme.



Fig. 1 – Model of Development at Stage 2 Pre-Application Consultation Stage.



Fig. 2 – Model of Development at Planning Application Stage.

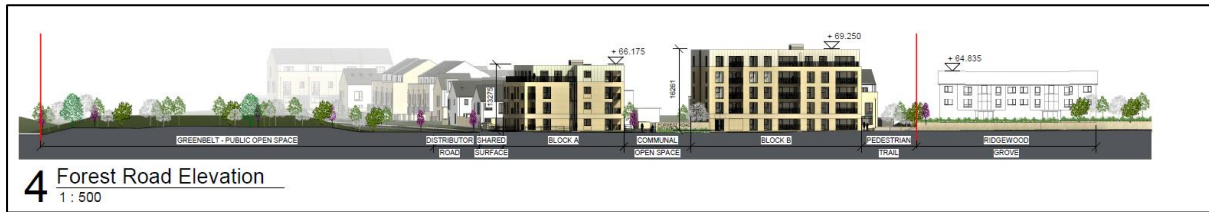


Fig. 3 – Contiguous elevation along Forest Road

It is respectfully considered that the revised designs have fully addressed the concerns of the Planning Authority and provide for a higher quality design approach to the development. The Planning Authority are invited to refer to the enclosed plans and Design Statement, prepared by Crawford Architecture and the verified views prepared by 3D Design Bureau for further details of the redesign of the apartment blocks.

2.2 ITEM NO. 1.2

FCC Opinion: *The overall design should reflect the site's transitional character between the rural Green Belt to the south and the developing area to the north. More detail on materials and finishes is needed, with a variety of textures encouraged. Units in Zone B are too close to the Green Belt boundary and should include a landscaped buffer and be reoriented to engage with the southern outlook. Units in Zone E are isolated from the rest of the development and should be reconsidered.*

Applicant's Response:

As noted above, further consideration of the overall site layout and form was carried out by the applicant and design team. The inclusion of the distributor road as a main access route to the scheme, and the introduction of a large public park on the GB zoned lands, which are located to the south of the housing development, facilitated a reimagining of the overall layout and appearance of the proposed development. An increased buffer is now provided between Block A as well as Zone B and the GB zoned lands. The relevant blocks have also been reconsidered in terms of their orientation and design, with the apartments in Block A in particular being significantly redesigned to provide for a more appropriate outlook that addresses the southern elevation and lands.

Whereas previously the houses would have been hard to the edge of the GB boundary, there is now a landscape buffer between it and the road and GB lands.

Furthermore, the palette of materials has also been refined, and the Planning Authority are invited to refer to the Design Statement by Crawford Architecture for more details.



Fig. 4 – VVM 8 – looking north from Forest Road towards the southern elevation of Block A – highlighting how it addresses the GB lands.

2.3 ITEM NO. 1.3a

FCC Opinion: *The site layout should better account for the historic hedgerow along the northern townland boundary and the proposed road to the south. In line with Fingal Development Plan objectives, a management plan and Arboricultural Method Statement are required to preserve and enhance this hedgerow with supplementary planting. Additionally, the east–west pathway along the northern boundary should be continuous and redesigned in consultation with an arborist and landscape architect, as it lies within a "no dig zone".*

Applicant's Response:

In response to this, the applicant engaged Charles McCorkell to prepare an arboricultural report and method statement, which outlines how the hedgerow to the north is to be protected. It is noted that the buildings and structures are all to be located outside the Root Protection Zone of this hedgerow and trees and the proposed path along the northern part of the site will be a trail type with a no-dig approach proposed. No public lighting is being proposed here in order to protect the trees and hedgerows. This was redesigned in consultation with the arborist (Charles McCorkell). While the Planning Authority wanted a cycle and pedestrian path here, the introduction of the access road to the south, facilitated the moving of the cycle path adjacent to that road and so reduce the requirement for space and lighting on the northern boundary. The Planning Authority are invited to refer to the

reports by Charles McCorkell as well as the Landscape Plan and Rationale by RMDA, which are submitted under separate cover.

2.4 ITEM NO. 1.3b

FCC Opinion: *The applicant must demonstrate compliance with Public Open Space standards, ensuring spaces are usable, appropriately sized for natural play, and clearly distinguished—particularly designating the northern linear space as Environmental Open Space. Open spaces should be level, with cross-sections provided. Additionally, the proposed pedestrian link to Ridgewood Green requires revision to properly connect with existing paths*

Applicant's Response:

Following the Pre-Planning Consultation, the GB zoned lands were introduced to the scheme as a public park. Further engagement with the Green Infrastructure and Water Services Department of the Council confirmed that nature-based SuDs could be incorporated onto the GB lands. This facilitated moving the previously proposed attenuation area from Open Space 1 in the centre of the site to the GB lands. Thus all of the open space on the RS zoned lands, which extend to 12% of the zoned part of the site, are fully usable and consistent with the requirements of the Development Plan. The Environmental Open Space strips are not counted as part of the open space calculations, and this is clearly distinguished on the enclosed Open Space Plans submitted with the application.

The application indicates a potential connection into Ridgewood to the north. This has been designed by RMDA and a section drawing (Section D-D) has been prepared by them, which the Planning Authority are invited to refer to for further details. It is important to note that this application does not propose any works within Ridgewood itself but rather outlines how such a connection could be provided. The connection is located beside the existing open space in Ridgewood but close to the path there, and in fact there is evidence that this is an existing desire line used by people.



Fig. 5 – Open Space Provision

2.5 ITEM NO. 1.4

FCC Opinion: Due to the site's location within Dublin Airport Noise Zones B and C, there are concerns about potential noise impacts. The applicant must clarify noise modelling assumptions, provide separate results for aircraft and road noise at multiple heights, and detail sources of night-time noise events. Eastern buildings should be reoriented to shield balconies from road noise. Noise barrier walls are not favoured; however, full details, including location, materials, and visual impact, must be submitted. A Visual Impact Assessment and additional information under LRD regulations are also required.

Applicant's Response:

Wave Dynamics were appointed to prepare a 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 to 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. The Assessment concluded by stating:

“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 8223:2014 and ProPG 2017 guidance”.

It was determined that additional design changes were not required to the apartments. However, an acoustic wall is proposed in front of the communal open space between Blocks A and B. This will be a stone wall, 2 metres in height and will be consistent with the existing wall to the front of Ridgewood.

This is captured in VVM7 by 3D Design Bureau, which is extracted below for the convenience of the Planning Authority. It is respectfully considered that this, in fact, acts an attractive piece of boundary treatment for the overall scheme.

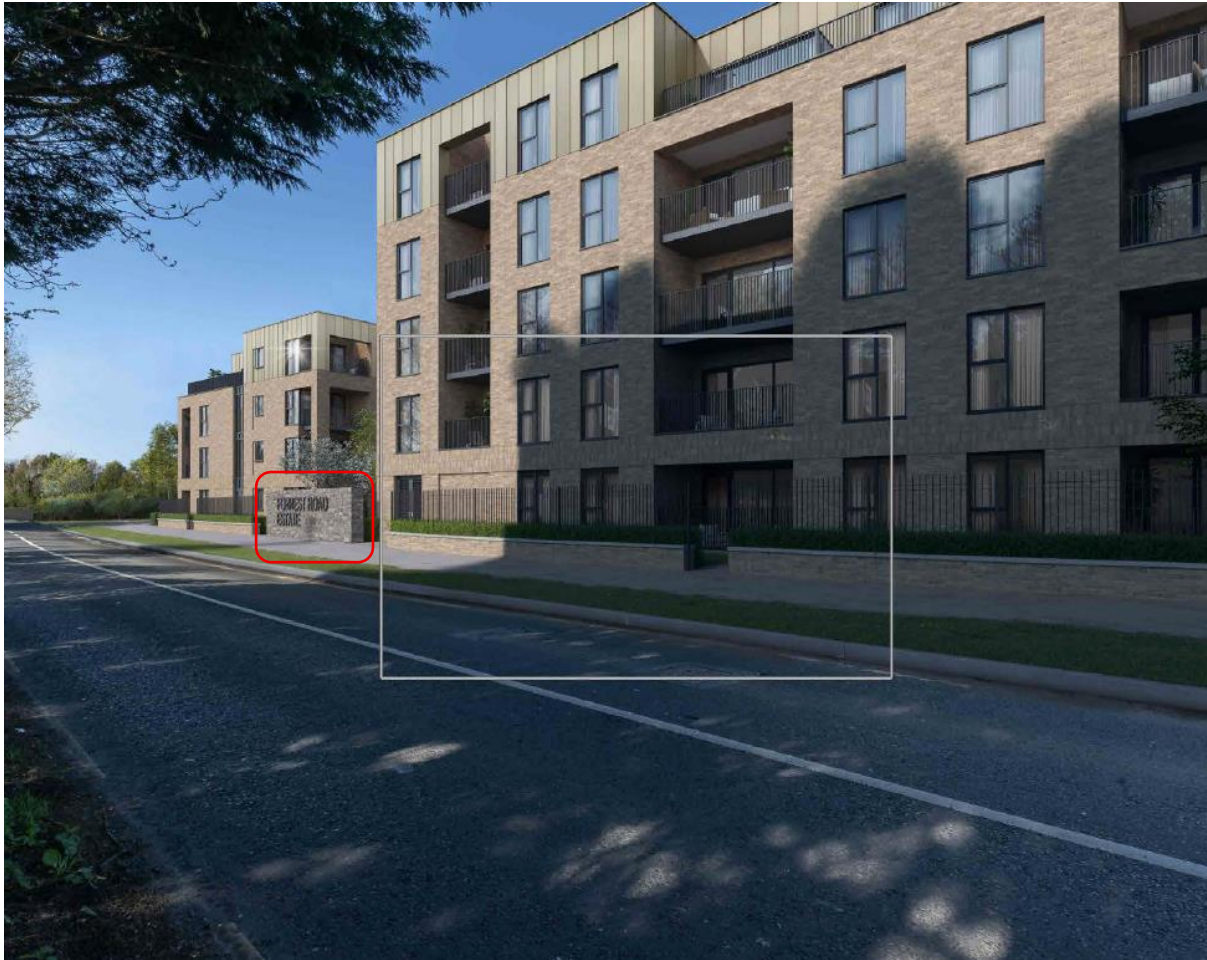


Fig. 6 – VVM7 indicating the proposed acoustic wall facing Forest Road (outlined in red)

Section 2.0 (Transportation Considerations)

2.6 ITEM NO. 2.1

FCC Opinion: *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.*

Applicant's Response:

As noted above, further consideration of the overall site layout and form was carried out by the applicant and design team. The inclusion of the distributor road as a main access route to the scheme, and the introduction of a large public park on the GB zoned lands, which are located to the south of the housing development, facilitated a reimagining of the overall layout and appearance of the

proposed development. An increased buffer is now provided between Block A as well as Zone B and the GB zoned lands. Street trees, a verge and boundary treatment have been incorporated into the scheme that further improve the urban design approach and improve safety. This is indicated



Fig. 7 – CGI's by 3D Design Bureau showing the improved verge treatment

FCC Opinion: *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.*

Applicant's Response:

As previously discussed, this has been redesigned to now provide a continuous route. It is important to note that the majority of this route is in the form of a trail so that a no-dig construction method is incorporated to protect the existing trees and hedgerows.

The main pedestrian route and cycleway will be on the southern side of the houses running parallel to the main road.



Fig. 8 – Extract from RMDA's Landscape Masterplan showing the continuous route along the northern boundary

FCC Opinion: 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.

FCC Opinion: 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.

FCC Opinion: 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.

FCC Opinion: 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.

FCC Opinion: *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.*

FCC Opinion: *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.*

FCC Opinion: *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.*

Applicant's Response:

In response to the above, points by the Planning Authority, the applicant shall respond as follows:

The internal road has been completely redesigned as a result of the main access now coming from the south. This has allowed for home zones and reduced road lengths. The scheme is fully DMURS compliant, and the Planning Authority are invited to refer to the DMURS Statement within BMCE's Infrastructure Report for further details.

2.7 ITEM NO. 2.2

FCC Opinion: *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*
- iii. *require an additional 0.5m to allow for future potential widening of the road*
- iv. *carriageway)*
- v. *iii. A 2m wide cycletrack.*
- vi. *iv. A 2m wide footpath.*

Applicant's Response:

These requirements have been incorporated into the revised design, which is now submitted to the Planning Authority. A new cycle and footpath is provided to the front of the site along Forest Road and the infrastructure design is included within BMCE's package.

FCC Opinion: *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.*

Applicant's Response: In response to the Council's feedback regarding the provision of a stage 1 Road Safety Audit. A Stage 1 Road Safety Audit has been prepared and is submitted with the application. The Road Safety Audit has been carried out in accordance with the TII Publication *GE-STY-01024 – Road Safety Audit*, and has been undertaken on the final proposed layout intended for planning

permission. The audit reviews the proposed development and associated works from a road safety perspective and concludes that the layout is appropriate, subject to the recommendations provided. The relevant guidance within the Road Safety Audit were incorporated into the final design of the scheme to ensure it is fully compliant with its recommendations.

FCC Opinion: *The applicant should provide the fully developed layout and details of the bicycle parking provision for mid-terrace units and duplex units.*

Applicant's Response:

Details of the bicycle parking for these units are contained within the architectural plans prepared by Crawford Architecture. Bicycle stores are provided to the front of terrace units and some of the units, such as duplex units, would be served by communal bicycle stores.

FCC Opinion: *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.*

Applicant's Response:

All of the parking spaces are provided with EV parking with appropriate space for the ducting and services incorporated into the layout. The Planning Authority are invited to refer to the Site Layout Plan for further details.

FCC Opinion: *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.*

Applicant's Response:

The main pedestrian and cycle routes are to be fully serviced with public lighting, and these are set out in the lighting design and report by Fallon Design. However, in order to protect the existing hedgerow and trees to the north, and also from an ecological perspective, following guidance from the project ecologist, the northern path is not proposed to be lit. However, this is a secondary route only, with the main pedestrian and cycle route located on the southern side of the site.

Section 3.0 (Water Services Considerations)

2.8 ITEM NO. 3.1

FCC Opinion: (*Foul drainage: Uisce Éireann*) *The applicant has submitted a Pre-connection Enquiry to Uisce Éireann, but feasibility confirmation is still pending. A connection to the existing gravity sewer is proposed, though preliminary levels suggest a pumping station may be needed. If confirmed, a 35m buffer zone will be required per CDP policy IUO7, likely necessitating significant redesign of the current layout.*

Applicant's Response: Confirmation of Feasibility has been obtained from Uisce Éireann (CDS24006398 refers) and a copy of this is included within BMCE's Infrastructure Report, which the Planning Authority are invited to refer to.

FCC Opinion: *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.*

Applicant's Response:

Ground Investigations were carried out for the site and were used to inform the surface water drainage design. Details of this are included within BMCE's Infrastructure Report, which the Planning Authority are invited to refer to.

2.9 ITEM NO. 3.2

FCC Opinion: *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.*

Applicant's Response:

The Planning Authority are invited to refer to BMCE's Infrastructure Report, which is submitted under separate cover for further details.

2.10 ITEM NO. 3.3

FCC Opinion: *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.*

Applicant's Response:

As a result of further design changes, and as noted previously in this report, the detention basin previously proposed in the open space in the centre of the site is now located further south on the main public park area. This means that the public open space on the RS zoned part of the site is fully usable and consistent with the requirements of the Planning Authority, who are invited to refer to BMCE's Infrastructure Report and drawings, as well as RMDA's landscape plans, which are submitted under separate cover, for further details.

2.11 ITEM NO. 3.4

FCC Opinion: *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.*

Applicant's Response:

A Taken in Charge Drawing has been prepared by Crawford Architecture and is submitted as part of the application for the consideration of the Planning Authority.

2.12 ITEM NO. 3.4

FCC Opinion: *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.*

Applicant's Response:

The Planning Authority are invited to refer to BMCE's Infrastructure Report and drawings, which are submitted under separate cover, for further details on this matter.

Section 4.0 (Parks and Green Infrastructure Considerations)

2.13 ITEM NO. 4.1

Existing trees and vegetation:

FCC Opinion: *Hedgerow along the north boundary is a townland boundary; therefore, as per Objective DMSO128 & Objective SPQH091 of Fingal's County Development Plan, a management plan should be provided to retain the hedgerow's historic value as a townland boundary.*

Applicant's Response:

As previously discussed, the design of the scheme has been amended such that the works are located outside the Root Protection Zone of the main hedgerow along the northern boundary, in order to protect this feature. Details of this are included in the Arboricultural Report and drawings, prepared by Charles McCorkell, which are submitted under separate cover.

2.14 ITEM NO. 4.2

Existing trees and vegetation:

FCC Opinion: *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.*

Applicant's Response:

In response to the Council's feedback and to address the request regarding the townland boundary hedgerow; a Tree Survey and Schedule, along with an Impact Assessment prepared by Charles McCorkell, assess the existing condition and value of the hedgerow and identify necessary protection and enhancement measures. Additionally, a Landscape Architecture Design Rationale, Green Infrastructure Plan and a Landscape Management Schedule, all prepared by RMDA, outline a coordinated strategy for the retention, protection, and reinforcement of the hedgerow.

This approach ensures compliance with Objective DMSO128, as the existing hedgerow marking the historic townland boundary to the north is preserved, incorporated into the layout of the development, and enhanced through supplementary native planting. The design respects the landscape character and contributes to the green infrastructure network.

Furthermore, the development complies with Objective DMSO172 by avoiding any detrimental impacts to the historic townland boundary. The hedgerow is retained in situ, and no removal is proposed. Should any modifications be required in the future, appropriate procedures—including a survey and photographic record—would be undertaken in accordance with the objective.

Together, these measures demonstrate a considered and policy-compliant approach to the preservation and enhancement of the historic townland boundary within the proposed development.

2.15 ITEM NO. 4.3.1

Public Open Space:

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

Applicant's Response:

As previously discussed, the overall site layout has been fundamentally changed and improved with the incorporation of a large public park to the south of the site. The public open space within the RS zoned part of the site is no longer affected adversely by SuDS and is in accordance with the requirements of the Planning Authority.

2.16 ITEM NO. 4.3.2

Public Open Space:

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

Applicant's Response:

As discussed earlier, the detention basin has been relocated to the south of the site so that it is no longer within Open Space 1 on the site. The play area and paths are no longer affected by this SuDS feature.

2.17 ITEM NO. 4.3.3

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

Applicant's Response:

The open space to the north is now clearly indicated as Environmental Open Space and not counted towards the overall quantum of public open space. This was discussed previously in this report and indicated on the relevant drawings and Fig. 5 above.

2.18 ITEM NO. 4.3.4

FCC Opinion: Public 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.*

Applicant's Response:

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 indicating 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.

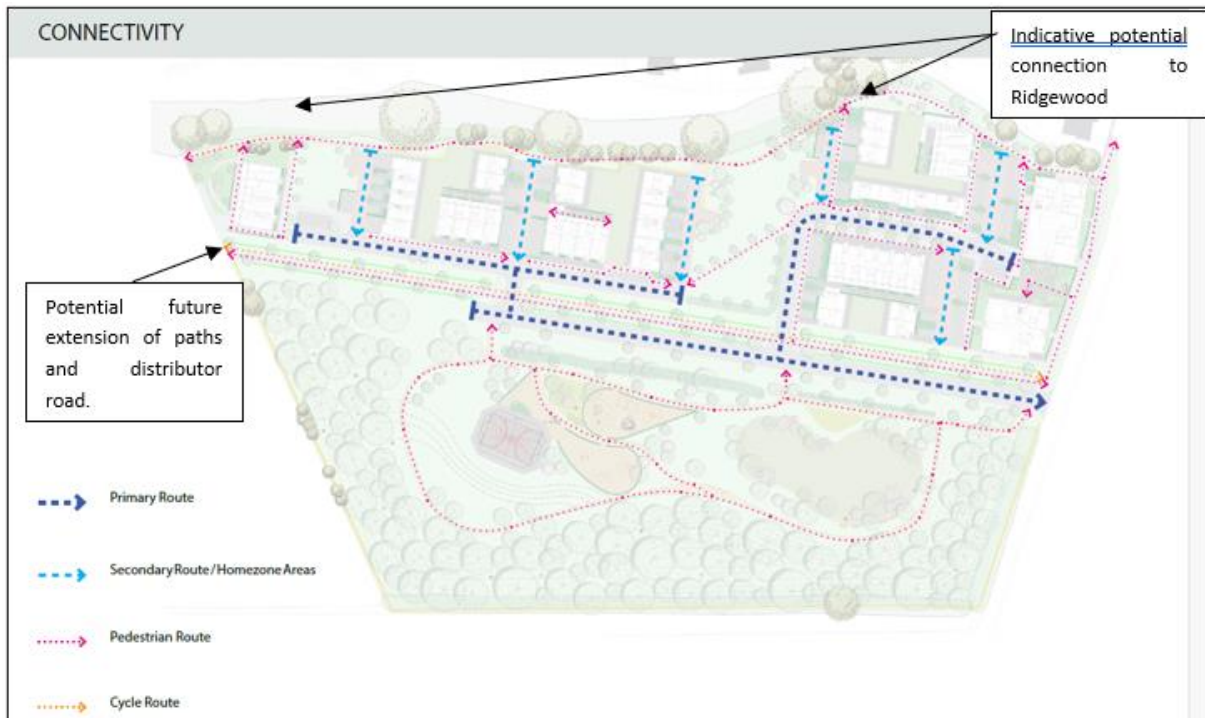


Fig. 9 – Connectivity to Ridgewood

2.19 ITEM NO. 4.4

FCC Opinion: Public Open Space: 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).

Applicant's Response:

The Landscape Masterplan, prepared by RMDA Landscaper Architects, clearly indicates the quantum and location of each part of the open space across the application site. It is noted that the provision of open space exceeds the requirements of Table 4.2 of the Development Plan, and this is confirmed in the Statement of Consistency prepared by DOWNEY.

The main play area is now proposed to be located on the main public park on the southern side of the access road and thus will be in excess of 25 metres from the nearest house.

2.20 ITEM NO. 4.5

FCC Opinion: Street Tree Plan: *A street tree plan is required.*

Applicant's Response:

RMDA Landscape Architects have prepared a planting plan and outlines how street trees are proposed. It is confirmed that no light is located within 7 metres of a tree.

2.21 ITEM NO. 4.6

FCC Opinion: Landscape Plan: *The tree/hedgerow footprint to be clearly shown on the landscape plan.*

Applicant's Response:

The Landscape Masterplan, prepared by RMDA Landscape Architects clearly shows the footprint of the existing trees and hedgerows. Cross sections by RMDA Landscape Architects also show the proposed drainage/SuDS features and the Planning Authority are invited to refer to these for further details.

2.22 ITEM NO. 4.7

FCC Opinion: Overlooking of Green Space: *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).*

Applicant's Response:

As clearly indicated on the Site Layout Plan and Landscape masterplan, the development enjoys excellent passive surveillance across all areas of open space. There are no "blind-spots" and it is respectfully considered that anti-social behaviour has been designed out of the scheme.

2.23 ITEM NO. 4.8

FCC Opinion: Taken 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.*

Applicant's Response:

The Taken in Charge plan, prepared by Crawford Architecture, clearly shows all areas that are to be taken in charge by the Planning Authority, such that there can be no ambiguity. The applicant is happy for a suitably worded condition to be attached to any grant of permission, facilitating agreement on this by way of compliance.

2.24 ITEM NO. 5

FCC Opinion: Environment – Air and Noise:

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 he can be orientated to have balconies 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.

Applicant's Response:

Wave Dynamics have prepared an updated Acoustic Design Statement, which addresses points 5.1-5.3 of this request and the Planning Authority are invited to refer to that report for further details.

In response to item 5.4, it is noted that only a small length of an acoustic barrier is proposed to the front of the scheme, between Blocks A & B. This will be a 2 metre high wall with a stone finish. This is clearly indicated on the Landscape Masterplan as well as the verified views, prepared by 3D Design Bureau.

2.25 ITEM NO. 6

FCC Opinion: 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.

Applicant's Response:

In response to this, a Geo-physical Survey was carried out and is contained in the report by ACSU, which is submitted under separate cover. Archaeological Test Excavation shall be carried out in advance of any construction works taking place, as recommended in the report.

2.26 ITEM NO. 7

FCC Opinion: Public Lighting:

Applicant's Response:

The applicant engaged Fallon Design to prepare a public lighting design report and drawing, which are submitted under separate cover. This has been coordinated with the overall architectural, landscape and engineering drawings as well as by the arborist. A coordinated landscape, engineering and services drawing has also been prepared by RMDA, which is submitted under separate cover and shows that lights shall be no closer than 7 metres from trees. The Planning Authority are invited to refer to these for further details.

2.27 ITEM NO. 8

FCC Opinion: Part V:

Applicant's Response:

The applicant further engaged with the Housing Section prior to finalising the application and has agreed in principle the provision of 20% of units to be provided for the purposes of Part V. A validation Letter has been included. It is noted that UD units are incorporated into the Part V plans as indicated by Crawford Architecture.

3.0 CONCLUSION

DOWNEY, Chartered Town Planners, 29 Merrion Square, Dublin 2, D02 RW64, have prepared this Statement of Response to LRD Opinion 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 proposals incorporated into the final scheme are considered to result in a high-quality development being presented to Fingal County Council for approval. It is submitted that the further documentation and additional studies undertaken and now being submitted, further support this application for a Large-scale Residential Development at lands at Forest Road, Swords, Co. Dublin.

In light of the foregoing, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with the relevant national, regional and local planning policies and guidelines.