



THORNTON O'CONNOR
TOWN PLANNING

Planning Report and Statement of Consistency

**Prepared in Respect of a Large-Scale
Residential Development Application for
Permission for the Provision of a 123 No.
Apartment Units at a Site fronting
Swords to Malahide Road (R106),
Mountgorry, Swords, Co. Dublin**

**Prepared on Behalf of Bartra Propco No.
23 Limited**

September 2024

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Planning Department
Fingal County Council
County Hall
Main Street
Swords
Co. Dublin
K67 X8Y2

Thursday, 26th September 2024

Dear Sir/Madam,

RE: LARGE-SCALE RESIDENTIAL DEVELOPMENT APPLICATION FOR PERMISSION FOR THE PROVISION OF 123 NO. RESIDENTIAL UNITS AT A SITE FRONTING THE SWORDS TO MALAHIDE ROAD (R106), MOUNTGORRY, SWORDS, CO. DUBLIN

1.0 INTRODUCTION

1.1 Application for Development

Thornton O'Connor Town Planning¹ in association with the Multi-Disciplinary Team, as provided in Section 1.3 below, have been retained by Bartra Propco No. 23 Limited² to prepare this Large-Scale Residential Development ('LRD') Planning Application for the construction of 123 No. residential units on a site fronting Swords Road, Mountgorry, Swords, Co. Dublin.

1.2 Description of the Proposed Development

The full description of development is as follows:

"Bartra Propco No. 23 Limited intend to apply for permission for development for a Large-scale Residential Development (LRD) at this c. 0.8731 Ha site fronting the Swords to Malahide Road (R106), Mountgorry, Swords, Co. Dublin. The site is bounded to the west by open space, with Seamount View Housing Estate further beyond, to the south by the R106, to the east by an access road to the Applegreen Service Station and to the north by Swords Business Park.

The development's surface water drainage network shall discharge from the site into the existing manhole located along the access road to the east of the site. The development site area and drainage work area will provide a total application site area of c. 0.8792 Ha.

¹ No. 1 Kilmacud Road Upper, Dundrum, Dublin 14, D14 EA89

² Longphort House, Earlsfort Centre, Dublin 2

The proposed development will principally consist of: the construction of 123 No. residential units (55 No. one bed apartments and 68 No. two bed apartments). The development will be provided in a courtyard block arrangement ranging in height from part 4 No. to part 5 No. storeys. The proposed development has a gross floor area of c. 10,291 sq m.

The proposed development will also provide: vehicular access from the access road to the east; 24 No. car parking spaces; bicycle parking spaces; motorcycle parking spaces; pedestrian/cycle entrances at the south-west and north of the site, and along the western boundary connecting into the adjoining open space; a footpath and bicycle path around the south, east and north of the site perimeter and a shared cycle/pedestrian path along the western boundary; balconies and terraces facing all directions; hard and soft landscaping; boundary treatments; green roofs; lift overrun; PV panels; lighting; ESB substation; switchroom; plant; and all associated works above and below ground."



Figure 1.1: CGI of the Proposed Development from the Roundabout to the South-East of the Site

(Source: 'Verified Photomontages and CGIs' by Model Works, 2024)

1.3 Multi-Disciplinary Team

The following table provides the names and addresses of the Multi-Disciplinary Team involved in the preparation of this LRD Application:

Company Name	Company Address
Thornton O'Connor Town Planning	No. 1 Kilmacud Road Upper Dundrum Dublin 14 D14 EA89
Coady Architects	Mount Pleasant Business Centre Mount Pleasant Avenue Ranelagh Dublin 6
O'Connor Sutton Reynolds Multidisciplinary Consulting Engineers (OCSC Consulting Engineers')	No. 9 Prussia Street Stoneybatter Dublin 7 D07KT57
Áit Urbanism + Landscape	Third Floor Newmarket House Newmarket Square Dublin 8
CMK Hort + Arb Ltd.	Drumone Oldcastle Co. Meath
Enviroguide Consulting	3D Core C Block 71 The Plaza Park West Dublin D12 F9TN
Model Works	The Old Courtyard Newtownpark Avenue Blackrock Dublin A94 YD61
J.V. Tierney & Co Mechanical Electrical & Sustainable Engineers (J.V. Tierney & Co')	The Tannery Nos. 53-56 Cork Street Dublin D08 P92R
AWN Consulting Limited (AWN Consulting')	The Tecpro Building No. 17 Clonsaugh Business and Technology Park Dublin 17

Independent Site Management	No. 77 Camden Street Lower Dublin 2 Do2 XE80
Traffic Road Safety Engineering	Talent Garden Dublin Claremont Avenue Glasnevin Dublin D11 YNR

1.4 LRD Application

The proposed development is classified as a Large-Scale Residential Development as defined under the *Planning and Development (Amendment) (Large-scale Residential Development) Act 2021*:

"a) The development of 100 or more houses on land zoned for residential use or for a mixture of residential and other uses;

b) The development of student accommodation units which, when combined, contain 200 or more bedspaces, on land the zoning of which facilitates the provision of student accommodation or a mixture of student accommodation and other uses thereon;

c) Development that includes development of the type referred to in paragraph a) and of the type referred to in paragraph b), or

d) The alteration of an existing planning permission granted under Section 34 (other than under subsection 3(a) where the proposed alteration relates to development specified in paragraph a), b), or c)."

As the proposed development includes 123 No. residential units, the development is therefore considered a Large-Scale Residential Development.

1.5 Documents Discussed Throughout this Report

The following documents are discussed throughout this Planning Report:

National

1. *Project Ireland 2040 – The National Development Plan 2021-2030;*
2. *Project Ireland 2040: National Planning Framework;*
3. *Action Plan for Housing and Homelessness, Rebuilding Ireland;*
4. *Housing for All – a New Housing Plan for Ireland, September 2021;*
5. *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018);*

6. *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, 2023;*
7. *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007);*
8. *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024);*
9. *Design Manual for Urban Roads and Streets (2019);*
10. *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009);*
11. *Guidelines for Planning Authorities on Childcare Facilities (2001)*
12. *Part V of the Planning and Development Act 2000 (as amended); and*
13. *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (2009).*

Regional

1. *Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly, including the Metropolitan Area Spatial Plan for Dublin City and Suburbs.*

Local

1. *Fingal County Development Plan 2023-2029.*

It is through adherence to these documents and reference to their various tests, policies, objectives and criteria that this document aims to demonstrate how the proposed development is consistent with National, Regional, and Local Planning guidance.

1.6 Format of this Report

This Planning Report and Statement of Consistency comprises the following sections:

Section	Content
1.0	Introduction
2.0	Site Location, Description, Context & Accessibility
3.0	Planning History
4.0	Detailed Description of Development
5.0	National Policy - Statement of Consistency
6.0	Regional Policy - Statement of Consistency
7.0	Local Policy - Statement of Consistency
8.0	Planning Administration
9.0	Conclusion

2.0 SITE LOCATION, DESCRIPTION AND CONTEXT

2.1 Site Location and Description

The subject site and development comprise the following elements:

1. The **main development site** measures c. 0.8731 Ha.
2. An area measuring c. 0.061 Ha along the **access road serving the Applegreen Service Station to the east** will facilitate the discharge of the surface water drainage network into the existing manhole. Although this is outside the Applicant's ownership, the Applicant has a legal right of way to facilitate such works along the access road.
3. The **total site** area including the main development site and the infrastructural works measures c. 0.8792 Ha.

For the rest of this Report the site area will be referenced as c. 0.8731 Ha as this is the main development site and is the figure utilised when discussing density, public open space provision, etc.

The subject site is located c. 1.2 km (walking distance) to the east of Swords Main Street and c. 950 metres (walking distance) to the east of Pavilions Shopping Centre. The site is located on land to the north of the Swords to Malahide Regional Road (R106) and to west of the M1 motorway, as shown in Figure 2.1 below.

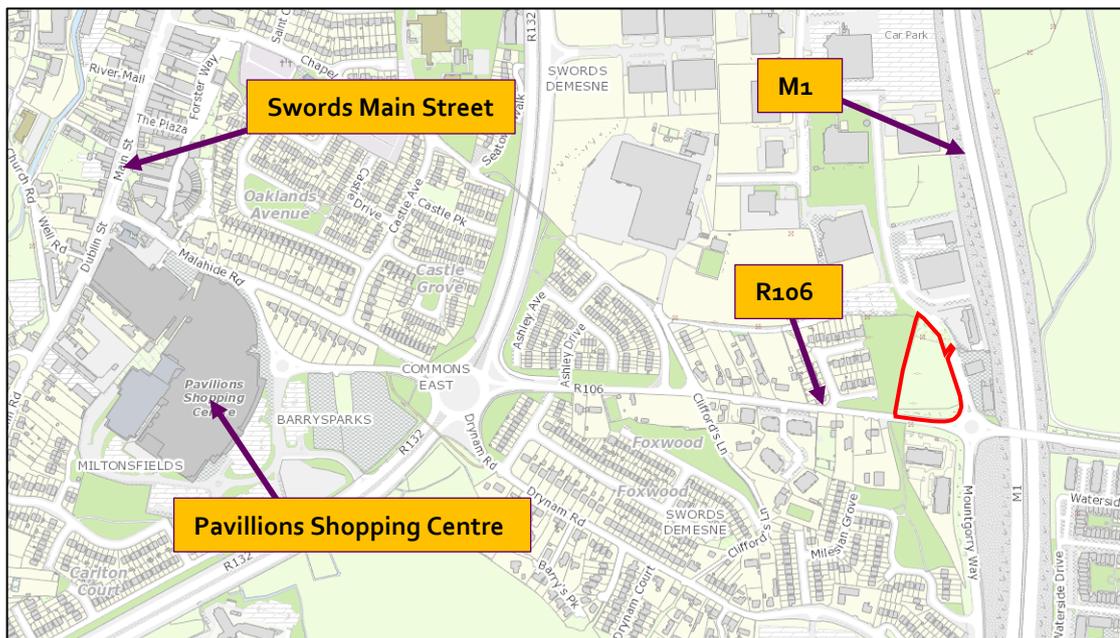


Figure 2.1: Map Demonstrating the Site's Location with the Indicative Boundary of the Subject Site Outlined in Red

(Source: Myplan.ie, annotated by Thornton O'Connor Town Planning, 2024)

The site is bound to the west of a large open space that serves the Seamount View housing estate further westwards, to the east of a cul-de-sac serving an Applegreen service station, to the north by an internal access road serving the Swords Business Park, and to the south by

the R106. There is a roundabout directly fronting the subject site, located to the south-east, which connects the R106, Mountgorry Way, and the cul-de-sac serving the Applegreen service station. This is detailed in Figure 2.2 below.

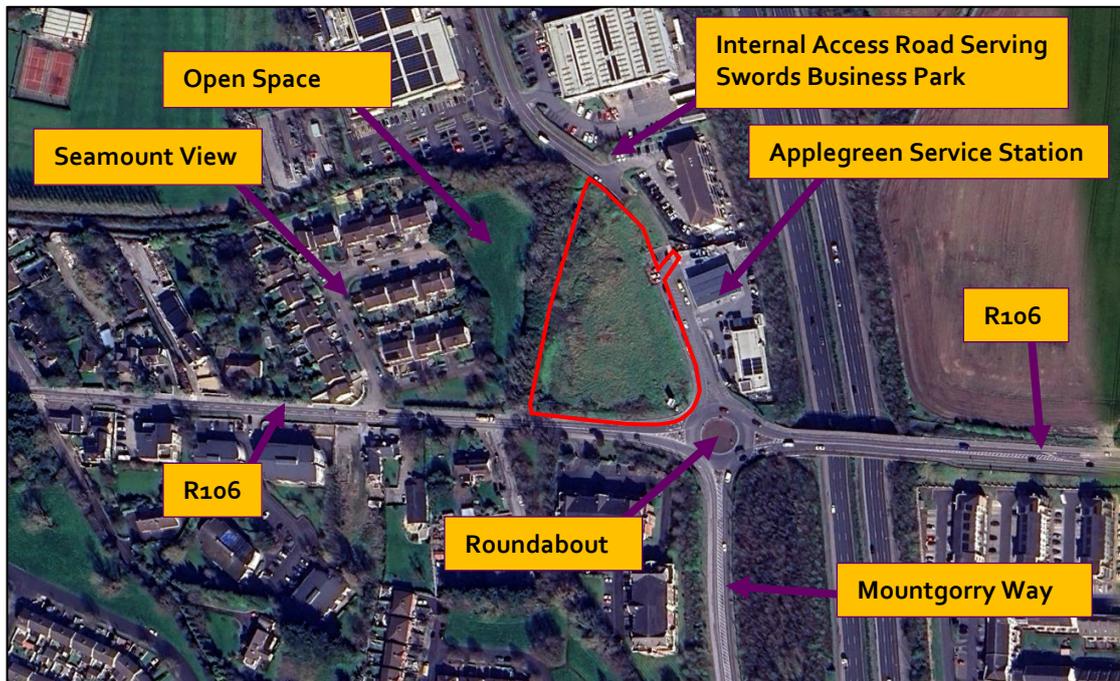


Figure 2.2: Aerial View of the Site’s Location with the Indicative Boundary of the Subject Site Outlined in Red

(Source: Google Maps, Annotated by Thornton O’Connor Town Planning, 2024)

2.2 Site Context

Directly north of the subject site is a large commercial estate, Swords Business Park, which is accessed from Seatown Road. It is our understanding that this Business Park is owned by the IDA, including its road network, hence there is no vehicle connection from this Business Park through to the access road (cul-de-sac) to the east of the subject site. The only connection available is a pedestrian path.

In terms of the general layout of the Swords area, the town centre and retail hub is located in the centre of Swords and includes the Main Street, and the Pavilions and Swords Central combined Shopping Centres. The built-up area of Swords is mainly to the west of the town where majority of low-density residential development is located. The east of Swords is mainly made up of commercial and industrial parks with some low-density housing. Beyond Swords is Malahide to the east and Dublin Airport to the south-west. This is shown in Figure 2.3 below.



Figure 2.3: Aerial View Map demonstrating the Site’s Context with the Site Location Indicated by a Red Star

(Source: Google Maps, Annotated by Thornton O’Connor Town Planning, 2024)

The Broadmeadow River or Broad Meadow Water flows from west to east, originating in Co. Meath, before flowing into the Broadmeadow Estuary, then into the Irish Sea past Malahide. The expansion of Swords is limited due to the restrictions imposed from the surrounding green belt, Dublin Airport to the south-west, and the Broadmeadow Estuary to the east.

2.3 Site Accessibility

The subject site can be primarily accessed by car, foot and bike from the R106 Malahide to Swords Road. The R106 leads west towards the Malahide Road Roundabout which offers different routes to various parts of Swords, such as continuing west on the R106 towards the town centre or taking the R132 southbound towards Dublin Airport and northbound towards more residential, commercial and industrial areas in Swords. The site is also located directly adjacent to a roundabout which presents routes eastwards towards Malahide on the R106, southwards on Mountgorry Way, as indicated in Figure 2.2 above. The M1 is located in close proximity to the subject site and provides routes southward to the M50 motorway and northwards towards Drogheda. This is highlighted in Figure 2.4 below.

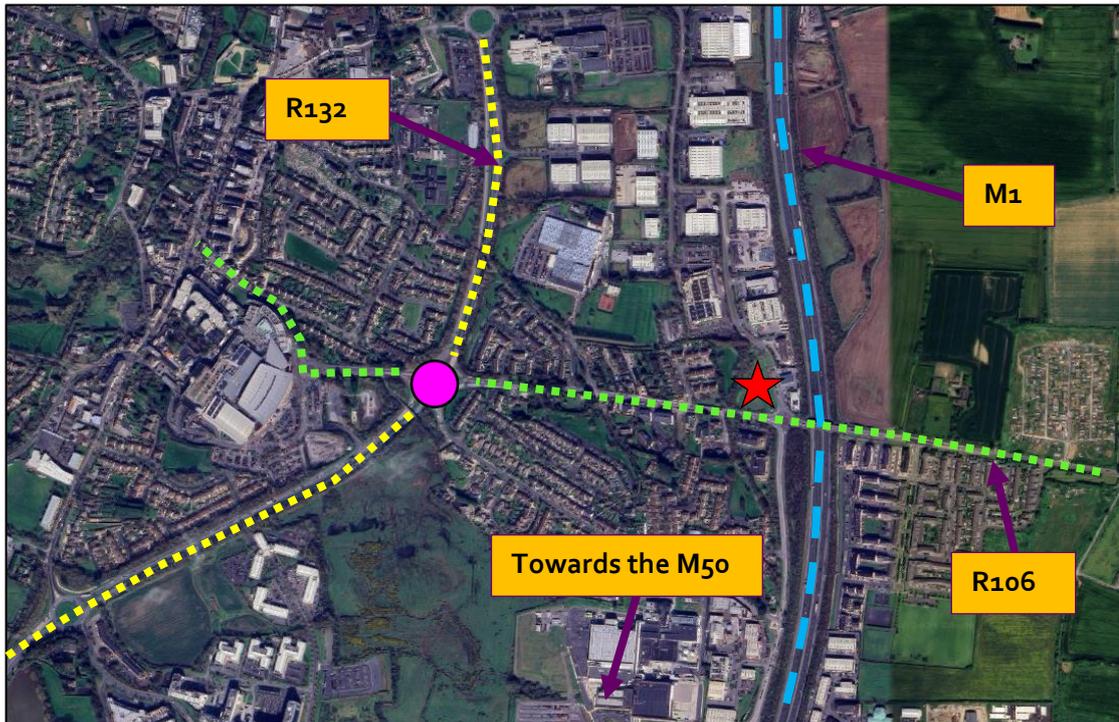


Figure 2.4: Wider Site Accessibility with the Site Location Indicated by a Red Star

(Source: Google Maps, Annotated by Thornton O'Connor Town Planning, 2024)

2.3.1 Rail Infrastructure

2.3.1.1 Existing Rail Infrastructure

The subject site is located c. 3.6 km from Malahide Train Station, which is an approximate 6 No. minute drive, 11-minute cycle, 48-minute walk, and 19-minute bus journey from the site. Malahide Train Station is served by both the Northern Commuter Train and the DART. The Northern Commuter Train has a peak frequency of c. 12-47 minutes³, while the DART has a peak frequency of every 3-20 minutes⁴.

³ Between 07:27 - 09:14, Monday to Friday, Dublin Connolly to Malahide & between 07:07 - 09:07, Monday to Friday, Malahide to Dublin Connolly.

⁴ Between 07:21 - 09:04, Monday to Friday, Dublin Connolly to Malahide & between 07:07 - 09:07, Monday to Friday, Malahide to Dublin Connolly.



Figure 2.5: Location of the Subject Site in Relation to Malahide Train Station

(Source: Google Maps, annotated by Thornton O'Connor Town Planning, 2024)



Figure 2.6: Rail Services Operated by Malahide Train Station Circled in Red

(Source: irishrail.ie, annotated by Thornton O'Connor Town Planning, 2024)

2.3.1.2 Proposed Rail Infrastructure

In the *Transport Strategy for the Greater Dublin Area 2016 – 2035*, improved public transport links across Dublin are presented with a 'New Metro North' line intended to be introduced that will see an improvement in public transport connection to Swords. Section 5.3.1 of the strategy states that:

"This new metro line will provide a high-speed, high-capacity, high-frequency public transport link from the city centre to Dublin Airport and Swords. New Metro North will serve a large number of significant destinations, including Ballymun, Dublin City

University and the Mater Hospital, and will interchange with other rail and bus services in the vicinity of Drumcondra, O’Connell Street and St. Stephen’s Green.”

The National Planning Framework 2040 and the National Development Plan 2021 – 2030 also highlights this new Metro line in Swords to be an example of how Dublin expects to respond to rapid growth in areas outside of the city. The new line will decrease journey times for people from Swords to Dublin City, with an approximate journey of 25 minutes for passengers. The new Metro line is shown in Figure 2.7 below.

The proposed MetroLink will provide a station in Swords, ‘Swords Central Station’, which will be approximately 800 metres (c. 10-minute walk) to the south-west of the site along the R132 (see Figure 2.8).

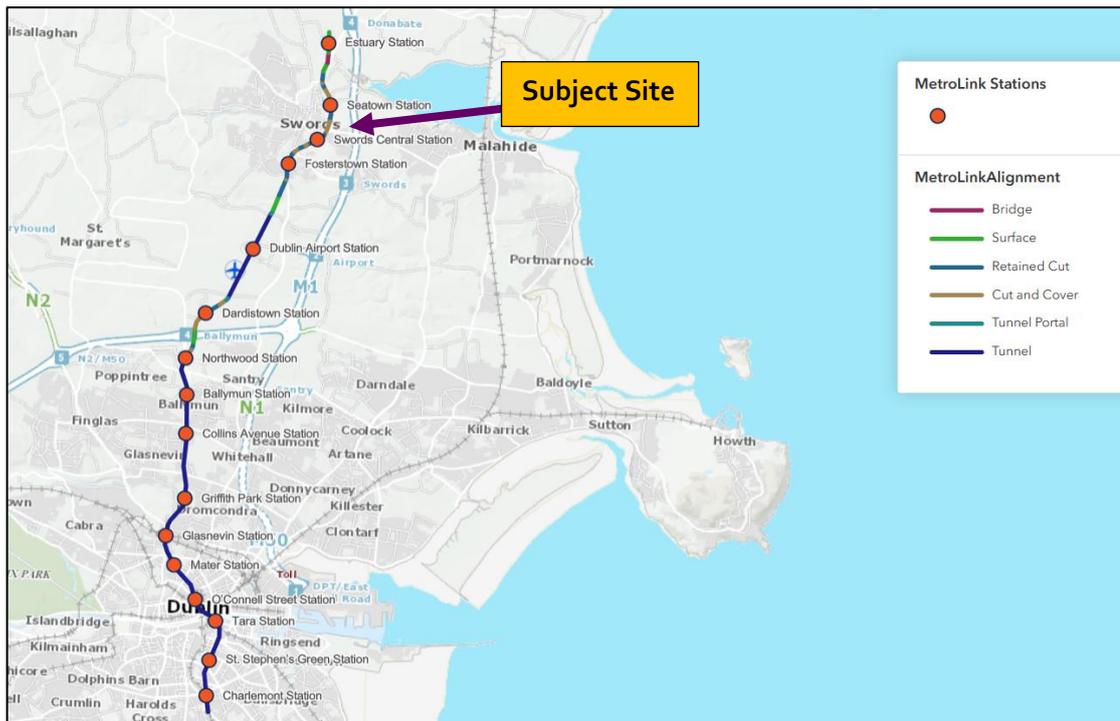


Figure 2.7: New Metro Line Proposed for Dublin With Site Identified

(Source: MMP prepared by OCS)

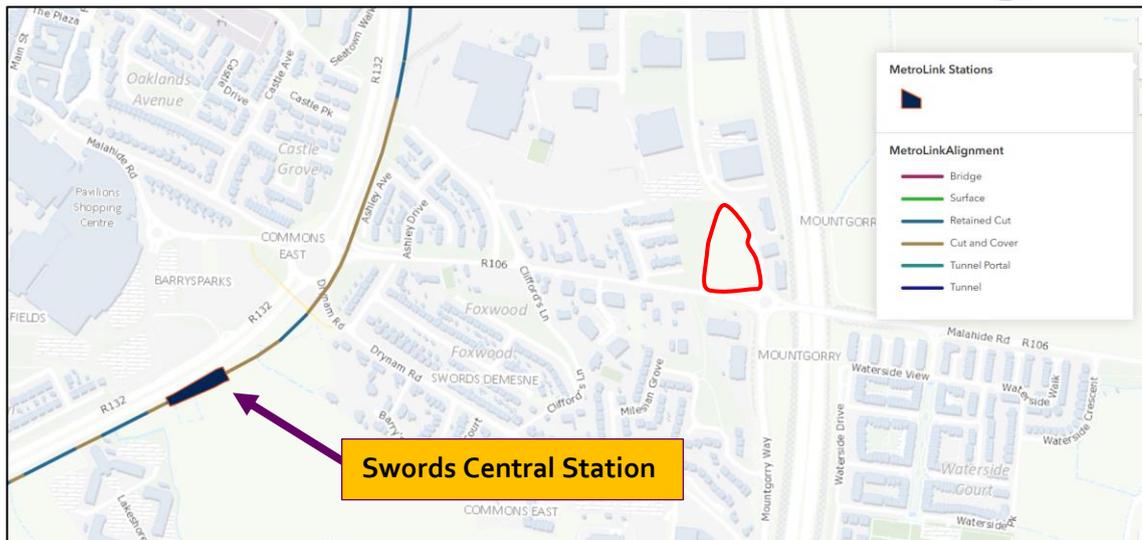


Figure 2.8: Site Proximity to MetroLink Line (Swords Central Station)

Source: [metrolink.ie](https://www.metrolink.ie), Annotated by Thornton O'Connor Town Planning, 2024)

2.3.2 Bus Services

2.3.2.1 Existing Bus Services

In addition to the proximity of the subject site from existing and future rail services, there are 9 No. bus routes that serve Swords. The following is a summary of the existing bus serves which operate close to the subject site:

Dublin Bus

- Route No. 102: Dublin Airport – Sutton Station
- Route No. 42d: The Helix – Strand Road / Portmarnock Bridge – The Helix
- Route No. 142: UCD Belfield – Portmarnock
- Route No. 43: Talbot Street – Swords Business Park / Jugback Lane – Talbot Street
- Route No. 41: Marlborough Street – Abbeyvale Estate
- Route No. 197: Swords Airside – Ashbourne

Swords Express

- Route No. 503: Ormand Avenue – Merrion Square
- Route No. 507: Ormand Avenue – Eden Quay
- Route No. 506: Eden Quay – Ormand Avenue

The closest bus stops to the subject site are 1050 and 1039 which are located only a few metres away from the site on the R106 and serve the bus routes 102, 506 and 507.

2.3.2.2 Proposed BusConnects

BusConnects is a national program for investment in the bus network in cities across Ireland. As part of BusConnects Dublin, the bus network will be re-designed, and a more legible and accessible transport network created. A key principle underpinning this network is the notion of 'Abundant Access' which is the idea that through simple connected and transfers between public transport services, more of the city should be accessible to passengers within a

reasonable travel time. One such way in which this will be achieved is through the provision of local routes which will provide important connections within local areas, linking local retail centres and facilitating onward transport connections.

Under BusConnects, a Local, Other City Bound and Peak Time Routes are proposed in proximity of the subject site along the R106 and Mountgorry Way, as illustrated on Figure 2.9 below. The emerging route network in the vicinity of the subject site will notably enhance connectivity with the surrounding area and beyond.

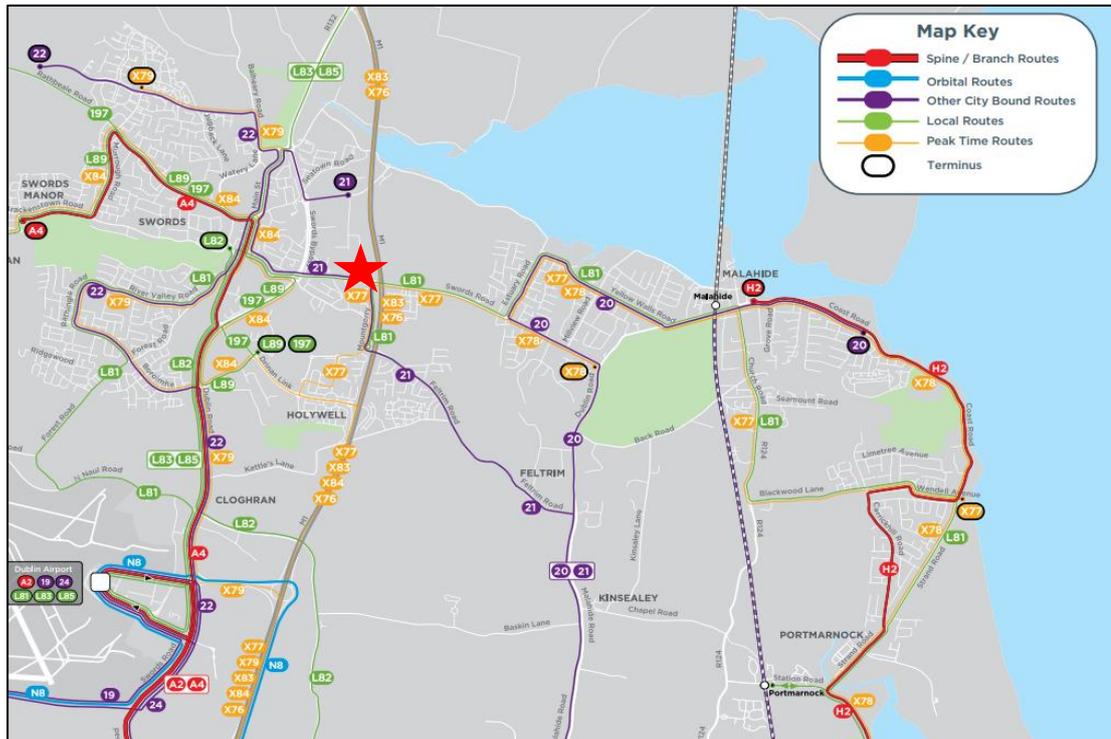


Figure 2.9 Proposed BusConnects Route In and Around Swords With the Subject Site Identified by a Red Star

(Source: busconnects.ie, Annotated by Thorton O'Connor Town Planning)

As can be seen in Figure 2.9 above and Table 2.1 below, the following proposed bus routes are particularly relevant to the subject site.

Proposed Bus Routes		
Bus Route	Destination	Weekday
Local Routes		
Route No. L81	Sutton – Portmarnock – Malahide – Swords – Airport	Every 20 minutes 06.00 – 19.00
Peak-Only/Express Routes		
Route No. X77	Portmarnock – City Centre – UCD	1 trips between 06:00 – 07:00, 3 trips between 07:00 – 08:00, 2 trips between 16:00 – 17:00 3 trips between 17:00 – 18:00 2
Route No. X83	Portrane – Donabate – City Centre – UCD	1 trip between 08:00 – 09:00 and 1 trip between 17:00 – 18:00
Other City Bound Routes		

Route No. 21	Swords Business Park – Kinsealy – City Centre	Every 30 minutes between 06:00 – 23:00 and 60 minutes between 23:00 – 00:00
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Table 2.1: Proposed Bus Routes in the Vicinity of the Subject Site

(Source: **BusConnects.ie, Table Generated by Thornton O’Connor Town Planning, 2024**)

In the context of the existing and proposed rail and bus services set out above, the site is very well served in this regard.

3.0 PLANNING HISTORY

3.1 Overview of Relevant Planning History at the Subject Site

According to Fingal County Council Online Planning Register, there have been 2 No. Planning Applications of relevance made in respect of the subject site. Details of these Planning Applications are presented below.

3.1.1 FCC Reg. Ref.: F17A/0714 - Mixed-Use Development

FCC Reg. Ref.:	F17A/0714
Application Date:	22 nd November 2017
Brief Development Description:	Permission for a mixed-use development consisting of (1) No. 4 storey commercial office block and a five-storey corner feature incorporating 2 No. 2 bedroom penthouse apartments and a restaurant over two levels; (2) 1 no. 5 storey apartment block consisting of 25 No. 2 bedroom apartments (3) 2 No. 4 storey apartment blocks consisting of 32 no. 2 bedroom apartments (The total number of apartments will be 59 No.). (4) An underground parking basement and vehicle entrance ramp for 222 car parking spaces (5) Provision for 2 No. ancillary heating and ventilation plant rooms on roof of Block A. An ESB meter room / switch room and a refuse collection area; (6) Provision of landscaped courtyards, bicycle parking, upgrading of landscaping and footpaths along the Swords to Malahide Road (R106) and the service road within the curtilage of the site; (7) A signature advertising feature of the corner; (8) A new 1.8m high perimeter security fence with supplementary planting along the western boundary with provision for pedestrian access gates to the public park to the west of the development; (9) provision for all storm water, foul drainage, mains water and electricity supply connections ancillary to the development to connect to the existing infrastructure; (10) Upgrading of the existing vehicle entrance on Swords to Malahide Road (R106) and provision of a new vehicle entrance to the underground car parking basement from the service road running up the eastern boundary.
FCC Decision Date:	13 th July 2018
FCC Decision:	Grant Permission Subject to 31 No. Conditions
Final Grant Date:	22 nd August 2018

Under Fingal County Council Planning Reference F17A/0714, permission was sought for a mixed-use development comprising 59 No. apartments, a commercial office block, a restaurant and underground car parking.

The Planning Officer noted the following in regard to the proposed height of 4 No. to 5 No. storeys:

"The height of the proposed development has been assessed and is considered to be appropriate in this location having regard to the ME zoning and the limited potential for impact on existing development in the area."

Further Information was sought by Fingal County Council on matters relating to Apartment Guidelines, children's play area, surface water drainage, landscaping, transport, Appropriate

Assessment Screening and a Noise Assessment. The Planning Officer was satisfied with the further documentation provided and recommended a Grant of Permission.

Fingal County Council decided issue a Notification of Decision to Grant Permission for the development on 13th July 2018, subject to 31 No. conditions, with a Final Grant subsequently issued on 22nd August 2018.

Key Point: The gross floor area permitted for the first application was 20,783 sq m (12,726 sq m above ground), whereas the gross floor area of the proposed development is lower at 10,291 sq m. The plot ratio permitted for the first application was 1.58 and the site coverage was 39.62%⁵, which is greater than the proposed development's plot ratio at just 1.18 and site coverage of 25%. The maximum height of the first application was 18.9 metres and the proposed development is only 0.37 metres taller, at 19.27 metres.

3.1.2 FCC Reg. Ref. F19A/0521 / ABP Ref. PLo6F.307526 - Amendment Application to the Permitted Mixed-Use Development

Permission was sought in November 2019 for the following amendments to the development permitted under Reg. Ref. F17A/0714:

FCC Reg. Ref.:	F19A/0521
Application Date:	6 th November 2019
Brief Development Description:	A material change of use and amendments to previous planning application F17A/0714 for a mixed use development consisting of: 4 six-storey apartment blocks containing 154 two bedroom apartments with commercial office space on the ground floor along Swords to Malahide Road (R106), a five storey corner block consisting of two-storeys of restaurant, two storeys of commercial offices and two penthouse apartments, an underground parking basement and vehicle entrance ramp for 199 car parking spaces, an ESB metre room/ switch room and refuse collection areas; provision of landscaped courtyards, covered bicycle parking, upgrading of landscaping and footpaths along the Swords to Malahide Road (R106) and the service road within the curtilage of the site; Advertising panels on the corner block; A new 1.8m high perimeter security fence with supplementary planting along the western boundary with provision for pedestrian access gates to the public park, to the west of the development; provision for all storm water, foul drainage, mains water and electricity supply connections ancillary to the development to connect to the existing infrastructure; upgrading of the existing vehicle entrance on Swords to Malahide Road (R106) and provision of a new vehicle entrance to the underground car parking basement from the service road running up the eastern boundary.
FCC Decision Date:	18 th June 2020
FCC Decision:	Grant Permission Subject to 23 No. Conditions
ABP Ref:	PLo6F.307526
ABP Decision	Grant Permission
ABP Decision Date:	17 th November 2020

⁵ Based on the site area of 0.8070 Ha for the first application.

Fingal County Council issued a Notification of Decision to Grant Permission on 18th June 2020; however, a Third-Party appeal was subsequently received by An Bord Pleanála from Seamount View Residents Association. The main concerns raised were matters relating to traffic congestion, flooding, height and impact on neighbouring residential amenity.

One key issue related to the public park between the subject site and Seamount View. The Seamount View residents considered the park was their own private park and didn't support the proposed access through the site to the park. Both Fingal County Council and An Bord Pleanála confirmed that the park was a public park and as such a connection through for the wider community was appropriate.

Another issue raised by the residents was the proposed height of the development, at a maximum of 5 No. storeys (18.58 metres). The Planning Authority provided the following response to the Third-Party Appeal with regards the proposed height:

"Scale and height of the proposal is considered acceptable and provide strong urban road frontage"

The Planning Inspector, in assessing the proposed height, considered the following:

"Having regard to the planning history of the site, the ME zoning objective pertaining to the site which seeks to provide for "high density mixed use development", the location of the site at the junction of the R106 and access road to the east and separation distances between the site and adjoining landuses I do not consider the proposal to represent an abrupt transition in scale which would render it visually incongruous with the existing character of development in the area..... Having regard to the above reasons and considerations and the planning history of the site I consider the principle of the proposed height of the development to be acceptable at this location." [Our Emphasis]

The following is the conclusion made by the Planning Inspector in their assessment of the proposed development at the subject site:

"Having regard to the "Metro Economic Corridor" zoning objective for the site, the pattern of development in the area, the planning history for the site and the nature and scale of the proposed development it is considered that, subject to compliance with the conditions set out below, the proposed development would be acceptable and would not seriously injure the amenities of the area. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area." [Our Emphasis]

An Bord Pleanála decided to Grant Permission on 17th November 2020 subject to 23 No. conditions with Condition No. 2 removing Block C from the scheme (see Figure 3.1 below identifying the location of Block C) resulting in some 128 No. residential units granted in the scheme, some 5 No. more than the proposed scheme.

Key Point: With the removal of Block C required as per Condition No. 2, there was 22,106.9 sq m of gross floor space permitted (with 14,520.9 sq m above ground), whereas the gross floor area of the proposed development is lower at 10,291 sq m. The plot ratio permitted for the amendment application (when Block C is removed) was 1.66 and site coverage was

32%⁶, which is greater than the proposed development's plot ratio at just 1.18 and site coverage of 25%. The maximum height of the first application was 19.9 metres and the proposed development is smaller at 19.27 metres.

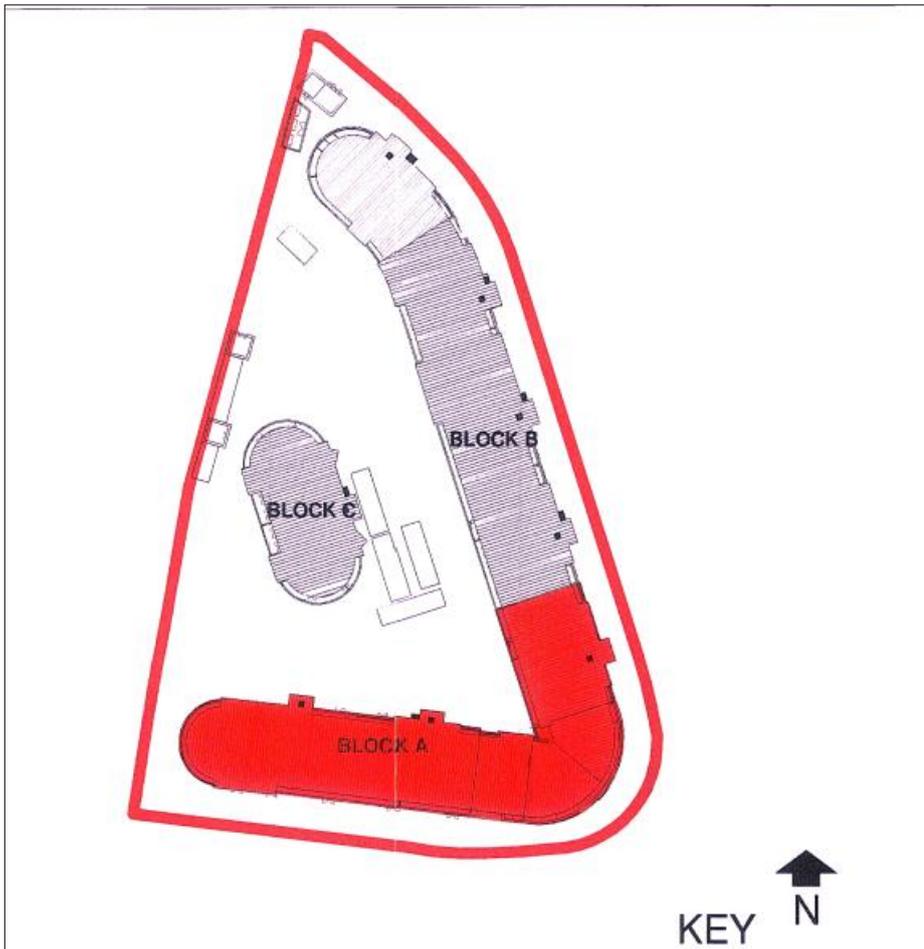


Figure 3.1: Key Plan of Permitted Scheme noting that Block C was conditioned out of the permission

(Source: Reg. Ref. F19A/0521 (www.fingal.ie))

Please see images below of the Further Information images noting again that Block C was removed by condition.

⁶ Based on the site area of 0.8608 Ha from the amendment application.



Figure 3.2: Images of the Development Lodged at RFI Stage Noting Block C Was Omitted by Condition

(Source: CGI Submitted Under FCC Reg. Ref. F19A/0521)



Figure 3.3: Images of the Development Lodged at RFI Stage Noting Block C Was Omitted by Condition

(Source: CGI Submitted Under FCC Reg. Ref. F19A/0521)



Figure 3.4: Images of the Development Lodged at RFI Stage Noting Block C Was Omitted by Condition

(Source: CGI Submitted Under FCC Reg. Ref. F19A/0521)



Figure 3.5: Images of the Development Lodged at RFI Stage Noting Block C Was Omitted by Condition

(Source: CGI Submitted Under FCC Reg. Ref. F19A/0521)



Figure 3.6: Images of the Development Lodged at RFI stage noting Block C was omitted by condition

(Source: CGI Submitted Under FCC Reg. Ref. F19A/0521)

As shown in these images, a 6 No. storey development has been granted at the subject lands and deemed acceptable by both Fingal County Council and An Bord Pleanála. This permitted scheme provides a more significant volume of building particularly along the eastern boundary and it also provided no public open space. The subject scheme concentrates development at the southern end of the site with a large volume of public open space provided on the northern end of the site.

3.2 Vicinity of the Subject Site

According to Fingal County Council Online Planning Register, there has been 3 No. relevant Planning Applications made for Residential Development comprising apartment units that are in close proximity to the subject site. Details of these Planning Applications are provided below, and the location of the application sites are identified in Figure 3.7.

It is noted that the below Planning Applications were all submitted many years ago; at a time where compact growth and high-density development was less fundamental to delivering housing units compared to current times. As such, apartment blocks of up to 3 No. storeys were provided in the vicinity of the subject site, with the current Application marking one of the first high-density developments in the area, in line with Local, Regional and National Planning Policy (see Section 5.0 – 7.0 below).

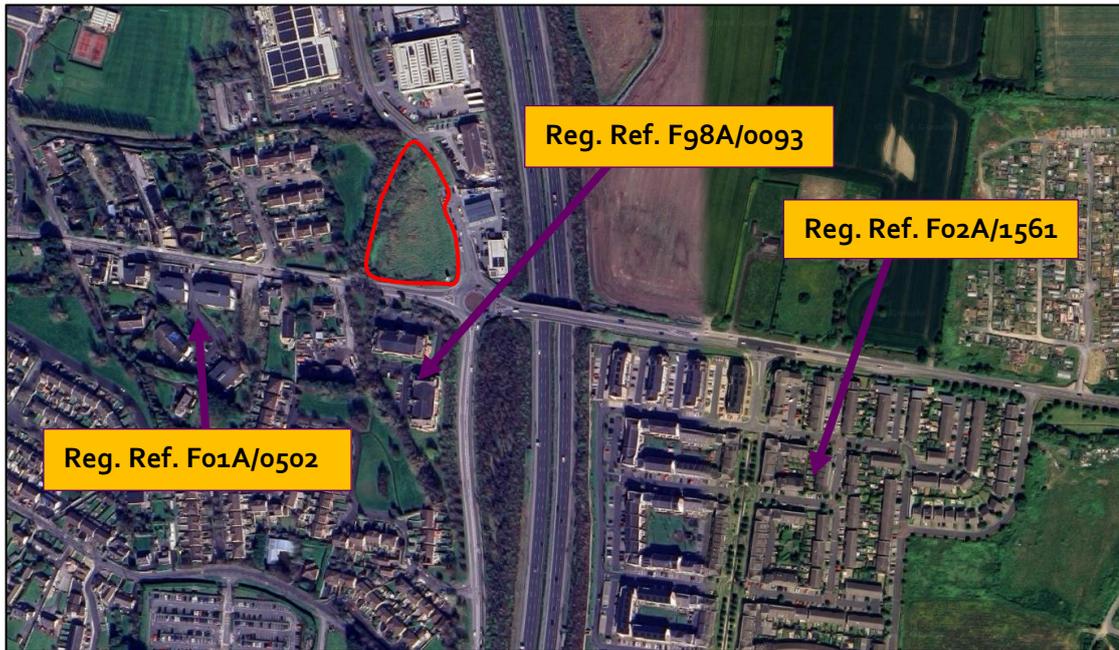


Figure 3.7: Location of Nearby Residential Development Comprising Apartments to the Subject Site

(Source: Google Maps, Annotated by Thornton O’Connor Town Planning, 2024)

3.2.1 FCC Reg. Ref F01A/0502 (ABP Ref. PLo6F.128380) – Application for the development of 58 No. Residential Apartments on Lands South-West of the Subject Site on the R106

FCC Reg. Ref.:	F01A/0502
Application Date:	30 th April 2001
Brief Development Description:	Construction of 58 No. 2 bedroom apartments in four Blocks (3 no. three storey and 1 no. two storey) with surface and underground car parking, all on and off site development works, boundary treatment and demolition of numbers 1, 2 and 2A Mountgorry, Malahide Road, on site of circa. 2.5 ac. with access to the Malahide Road and adjoining lands
DCC Decision Date:	18 th December 2001
DCC Decision:	Grant Permission
ABP Ref.	PLo6F.128380
ABP Decision:	Grant Permission
ABP Decision Date:	31 st May 2002

Figure 3.8 below shows the built out residential development of the above permitted Planning Application.



Figure 3.8: Street View of Planning Application Site F01A/0502 in Relation to the Subject Site

(Source: Google Maps Street View (Imagery Date - November 2022), Annotated by Thornton O'Connor Town Planning, 2024)

3.2.2 FCC Reg. Ref F02A/1561 – Application for the development of 551 No. residential Dwellings on Land South-East of the Subject Site on the R106

FCC Reg. Ref.:	F02A/1561
Application Date:	19 th December 2002
Brief Development Description:	Residential development consisting of 551 dwellings comprising of 162 houses (8 No. 4 bedroom and 3 No. 3 bedroom 2 storey detached houses, 18 No. 3 bedroom 2 storey semi-detached houses, 12 No. 3 bedroom 2.5 storey mid terraced houses, 20 No. 3 bedroom 2 storey corner end-terraced houses, 15 No. 3 bedroom 2 storey end terraced houses, 86 No. 3 bedroom 2 storey mid-terraced houses), 69 upper level duplex apartments (13 No. 2 bedroom in upper part of 2.5 storey pend blocks, 50 No. 2 bedroom in upper part of 2.5 storey terraces, 6 No. 2 bedroom in upper part of 2.5 storey end terraces) 69 No. 1 bedroom apartments with own hall door access at ground floor level of 2.5 storey duplexes and 251 apartments (86 No. 2 bedroom ground floor units, 70 No. 2 bedroom first floor units, 24 No. 3 bedroom first floor duplex apartments, 68 No. 2 bedroom second floor units, 3 No. 2 bedroom third floor units), 2 No. ground floor level childcare facilities of circa 150 sq. metres each and 2 No. ground floor level neighbourhood facilities of circa 150 sq. metres each, all associated on and off site development and ancillary works including outfall foul an surface water sewers, with foul water pumping station and rising main, hard and soft landscaping, open spaces and boundary treatments, 2 No. underground carparking areas ancillary to Blocks 1 & 6, 2 No. vehicular access points from the Malahide Road(R106), all on site of circa 14.22 Ha. (35.14 Ac), (Mountgorry Residential Action Plan Lands).
FCC Decision Date:	4 th July 2003
FCC Decision:	Grant Permission Subject to 39 No. Conditions

Final Grant Date:	19 th August 2003
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Since the abovementioned Application was Granted Permission, several amendment and additional Applications were made at the site (including FCC Reg. Ref. F15A/0279). The total number of units present on the site is c. 604 No. units. It is noted that the abovementioned planning application (as amended) permitted apartment blocks of 4 No. storeys fronting the R106.

Figure 3.9 below show the built out residential development to the south-east of the site.



Figure 3.9: Street View of Planning Application Site F02A/1561 (As Amended) in Relation to the Subject Site

(Source: Google Maps Street View (Imagery Date - March 2023), Annotated by Thornton O'Connor Town Planning, 2024)

3.2.3 FCC Reg. Ref F98A/0093 – Application for the development of 40 No. residential apartments on land directly south of the Subject Site on the R106 and Mountgorry Way

FCC Reg. Ref.:	F98A/0093
Application Date:	10 th February 1998
Brief Development Description:	40 apartments comprising 32 no. 2 bedroomed and 8 no. 3 bedroomed units, in 2 no. 3 storey blocks and site development works with vehicular access to the Malahide Road, on site of approx. 2 Acres on residentially zoned lands forming part of site Reg. Ref. F96A/0727
FCC Decision Date:	15 th April 1999
FCC Decision:	Grant Permission
Final Grant Date:	25 th May 1999

Figure 3.10 below show the built out residential development of the Planning Application Ref. F98A/0093.



Figure 3.10: View of the Residential Development Comprising Apartments Permitted Under Ref. Ref. F98/0093

(Source: Google Maps Street View (Imagery Date - November 2022), Annotated by Thornton O'Connor Town Planning, 2024)

3.3 Planning History Assessment

Having reviewed the Planning Applications made in respect of the subject site and lands in the immediate vicinity of the subject site, it is clear that residential development comprising apartments are accepted by both Fingal County Council and An Bord Pleanála. The surrounding developments that comprise apartment blocks of 2 No. to 4 No. storeys, were all permitted over 20 No. years ago. Since then, guidelines and policy documents on high-density developments and compact growth has evolved and progressed to allow developments in certain areas to facilitate taller building heights and a higher density. The area surrounding the subject site is made up of commercial and industrial developments, and residential development of various types, such as houses and apartments, with the subject site perhaps the last site in the immediate area to be developed.

Fingal County Council and An Bord Pleanála both accepted a height of 5 No. and 6 No. storeys at the subject site, as per the permitted scheme and amendment application on site, and a more visually intense building form, in our opinion. Furthermore, the plot ratio and site coverage of the proposed development is much smaller than that permitted for both application and is smaller than that permitted under the amendment application, thus representing a more appropriate scale of development at the site.

The proposed development has been well considered by a highly experienced Design Team, cognisant of the planning history of the subject site and surrounding area and having due regard to all relevant National, Regional and Local Planning Policy which seek high-quality and high-density developments. The proposed development will, inter alia, provide a high-quality living environment that provides opportunities for social interaction and integration and will enhance permeability and connectivity in the area.

4.0 DESCRIPTION OF DEVELOPMENT

4.1 Description of the Proposed Development

Per the proposed statutory notice, the development proposed is as follows:

"Bartra Propco No. 23 Limited intend to apply for permission for development for a Large-scale Residential Development (LRD) at this c. 0.8731 Ha site fronting the Swords to Malahide Road (R106), Mountgorry, Swords, Co. Dublin. The site is bounded to the west by open space, with Seamount View Housing Estate further beyond, to the south by the R106, to the east by an access road to the Applegreen Service Station and to the north by Swords Business Park.

The development's surface water drainage network shall discharge from the site into the existing manhole located along the access road to the east of the site. The development site area and drainage work area will provide a total application site area of c. 0.8792 Ha.

The proposed development will principally consist of: the construction of 123 No. residential units (55 No. one bed apartments and 68 No. two bed apartments). The development will be provided in a courtyard block arrangement ranging in height from part 4 No. to part 5 No. storeys. The proposed development has a gross floor area of c. 10,291 sq m.

The proposed development will also provide: vehicular access from the access road to the east; 24 No. car parking spaces; bicycle parking spaces; motorcycle parking spaces; pedestrian/cycle entrances at the south-west and north of the site, and along the western boundary connecting into the adjoining open space; a footpath and bicycle path around the south, east and north of the site perimeter and a shared cycle/pedestrian path along the western boundary; balconies and terraces facing all directions; hard and soft landscaping; boundary treatments; green roofs; lift overrun; PV panels; lighting; ESB substation; switchroom; plant; and all associated works above and below ground."

Please see Figures 4.1 – 4.3 below for CGI's of the proposed development.



Figure 4.1: CGI of the Proposed Development from the Roundabout to the South-East

(Source: 'Verified Photomontages and CGIs' by Model Works, 2024)



Figure 4.2: CGI of the Proposed Public Open Space and Northern Portion of the Apartment Building

(Source: 'Verified Photomontages and CGIs' by Model Works, 2024)



Figure 4.3: CGI of the Proposed Development Along the R106

(Source: 'Verified Photomontages and CGIs' by Model Works, 2024)

4.2 Key Site Statistics

Total Red-Line Site Area	0.8792 Ha (8,792 sq m)
Total Developable Area	0.8731 Ha (8,731 sq m)
Gross Floor Area	10,291 sq m
Total No. of Units	123 No. units
Height	5 No. storeys (19.27 metres)
Plot Ratio (Developable Area)	1.18
Site Coverage (Developable Area)	25%
Net Density	141 No. dwellings per hectare (dph)
Dual Aspect	62% (76 No. units)
Car Parking	24 No. spaces (including 6 No. EV, 2 No. Disabled Parking, 6 No. Car Club)
Cycle Parking	404 No. spaces (274 No. Long-Term & 130 No. Short-Term)
External Communal Amenity Space	932 sq m
Internal Communal Amenity Space	79 sq m
Public Open Space	1,142 sq m (13% of site area)

Table 4.1: Key Site & Development Statistics

(Source: Details Provide by Coady Architects, Table Generated by Thornton O'Connor Town Planning, 2024)

4.3 Residential Unit Type and Mix

The proposed development seeks the provision of 123 No. apartments, with the following providing a breakdown of the type and number of apartment units at each floor level:

Floor Level	1-Bed	2-Bed (3 Person)	2-Bed (4 Person)	Total No.
Ground Floor	10	6	3	19
First Floor	11	-	15	26
Second Floor	11	-	15	26
Third Floor	11	-	15	26
Fourth Floor	12	-	14	26
Total per type	55	6	62	123
Unit Mix (%)	44.7%	4.9%	50.4%	100%

Table 4.2: Proposed Unit Breakdown

(Source: Details Provide by Coady Architects, Table Generated by Thornton O'Connor Town Planning, 2024)

As illustrated in the enclosed plans and particulars prepared by Coady Architects and the *Housing Quality Assessment*, the 1-bed units will range in size from 49.5 sq m to 53 sq m, the 2-bed, 3-person units will range from 75.8 sq m to 83.3 sq m, and the 2-bed, 4-person units will range from 77 sq m to 80.7 sq m. Of the 123 No. units proposed, 76 No. are designed as dual aspect which represents 61.79% of the total number of units.

There are no 3 No. bed units proposed as part of this subject development due to the quantum of such units already present in residential housing in proximity to the subject site. Additionally, as discussed further in Section 5.2 below, the *National Planning Framework* requires an increase in one and two person households to meet affordable housing needs across the country. It is therefore considered appropriate to provide 1-and-2-bed units only for the proposed development.

The quality of the residential units and their associated adherence to the relevant development management standards is expounded upon herein and shown on the enclosed plans and particulars prepared by Coady Architects.

Of the aforementioned 123 No. residential units, it is proposed that 24 No. units will be transferred to the Planning Authority to comply with Part V of the *Planning and Development Act 2000 (as amended)* (see associated correspondence submitted herewith).

4.4 Site & Building Layout

The proposed scheme has taken a different design approach to the previously permitted scheme (see Figure 4.4 below, noting that Block C was removed by condition).

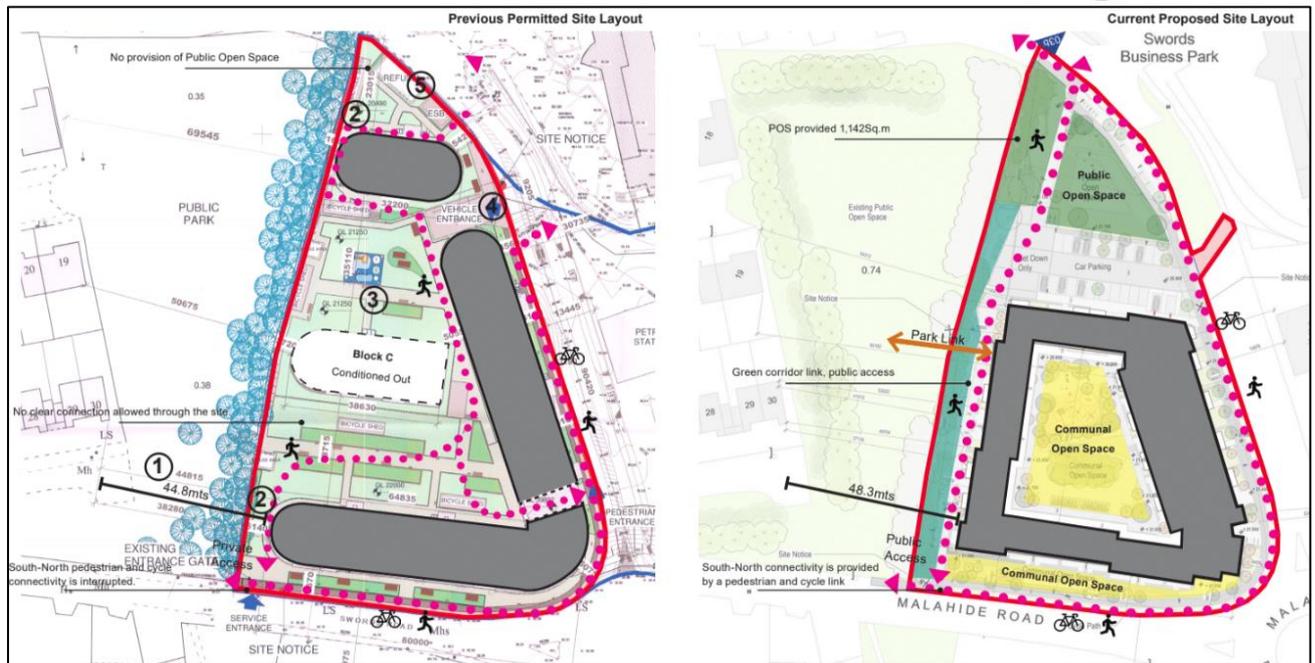


Figure 4.4: Previously Permitted Layout (With Block C Conditioned Out by ABP) to Left and Proposed Layout to Right

(Source: *Architectural Design Statement* by Coady Architects, 2024)

The proposed scheme provides a courtyard style block, which provides a number of benefits on the subject site, such as the following:

- It provides public open space to the north of the site which was not provided in the previously permitted scheme.
- It encloses the communal open space, providing an entirely private amenity space for the future residents.
- The development is contained in the southern portion of the site, providing an appropriate balance between achieving a sustainable residential density along with a more open and usable site by future residents and the wider community.
- The proposed site coverage of only 25% and plot ratio of 1.18 is lower than that previously permitted on site.
- The development provides a connection from the south of the site, through to the northern portion of the site (and vice-versa), providing permeability from the R106 through to Swords Business Park, a key planning gain.
- The 4 No. outer faces of the building provide active surveillance on all open spaces and linkages in and around the site.
- Active entrances at ground floor level enliven each edge of the building. Specifically, own door apartments wrap most of the east, north and west sides of the building.
- The apartments facing south, west and north are accessed from within the courtyard to allow the balconies to maximise their orientation and level of daylight/sunlight received.
- Through a combination of the courtyard style arrangement and the use of external decks in the courtyard area, a high proportion of the units (61.79% can achieve dual aspect).
- An internal community space is provided at ground floor level on the south-eastern corner providing an animated and vibrant space at this key road junction.

- Public, communal, and private realm are all very clearly defined within the proposed development. This has largely been achieved by using the building to clearly define the boundaries between each space.



Figure 4.5: Layout of the Proposed Development, Indicating the Courtyard Style Apartment Block and Public and Communal Open Spaces

(Source: Ait Urbanism + Landscape, 2024)

Pedestrian and cycle access is provided at numerous locations along the site's frontage. There are existing footpaths along the southern stretch of the R106 and partially along the eastern boundary opposite the Applegreen Service Station. The development proposes the provision of a footpath and cycle lane along its eastern boundary as well as multiple pedestrian and cyclist routes and access points throughout the site. Vehicular access is provided via a new entrance along the eastern boundary which leads into the proposed car parking area. The access points and linkages are illustrated in Figure 4.6 below.

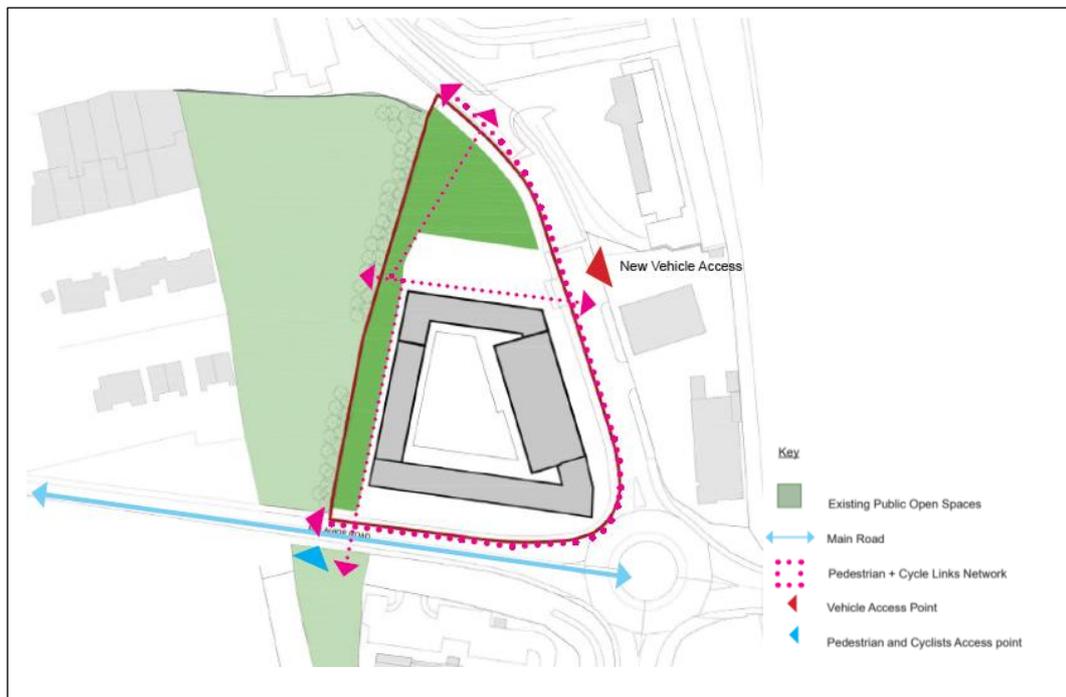


Figure 4.6: Proposed Connectivity and Permeability

(Source: Architectural Design Statement by Coady Architects)

4.5 Building Materials

As set out in the *Architectural Design Statement* prepared by Coady Architects and illustrated in Figure 4.7 below, the primary material context of the development is render and buff brick. The following description is provided:

"The architectural design of the scheme is characterized by a consistent and contemporary expression, creating a cohesive identity while preserving the simplicity of the elevations. This approach ensures uniformity across the development, giving it a distinct and recognizable aesthetic."

The facades primarily feature brick and render, chosen for their durability and visual appeal. Brick is predominantly used on the corner elements, framing the elevation and creating a sense of hierarchy. Dark render is strategically applied to emphasize vertical circulation elements, drawing the eye upwards and reinforcing the structure's verticality. In contrast, light render is employed to differentiate the corners and add visual interest to the elevations that face the communal open spaces. This careful selection and placement of materials enhance the overall design, contributing to both the functionality and aesthetic appeal of the development."



Figure 4.7: Proposed Material & Colour Palette Along the Southern Elevation

(Source: *Architectural Design Statement by Coady Architects, 2024*)

It is clear from the detailed *Design Statement* submitted herewith that high-quality materials have been proposed for the subject scheme and will help break down the overall mass and scale of the building.

4.6 Height & Massing

The scheme is part 4 No. to part 5 No. storeys in height, which is considered to be an appropriate transition in height from the 2 No. storey dwellings in Seamount View housing estate and 3 No. storey apartments in St. Werburghs estate. It is noted that the previously permitted schemes on site were 5 No. and 6 No. storeys.

The building modulates and steps down in various places across the elevations and roofscapes, and with the use of a diverse material and colour palette, the visual bulk of the building is reduced. Outward balconies also add to the variation across the elevations, rather than providing one long-uninterrupted wall. This is illustrated in Figure 4.8.



Figure 4.8: CGI of the Development Along R106, Illustrating the Various Modulation and Material/Colour Palette Proposed to Break up the Scale

(Source: 'Verified Photomontages and CGIs' by Model Works, 2024)

As demonstrated in Figure 4.9, the permitted development under Reg. Ref. F17A/0714 & F19A/0521 is at a significantly larger scale to that now proposed when viewed along the eastern elevation. The previous buildings extended across nearly the entirety of the eastern boundary of the site, giving little break in the streetscape. The proposed development seeks to concentrate the built form in the southern portion of the site, with car parking, landscaping and public open space encapsulating the remainder of the site to provide visual relief and overall, an improved living environment for the residents and the wider community through the provision of high quality public open space.

It is also noted that the first planning application at the subject site (Reg. Ref. F17A/0714) permitted a site coverage of 39.62% and a plot ratio of 1.58 and the amendment application (Reg. Ref. F19A/0521 / ABP Ref. PLo6F.307526) permitted a site coverage of 32% and a plot ratio of 1.69. The proposed development seeks a site coverage of only 25% and a plot ratio of 1.18 and therefore represents a more appropriate scale of development at the site.



Figure 4.9: Contiguous Eastern Elevation - First Permitted Application (Reg. Ref. F17A/0714) Outlined in Green, Second Permitted Application (Reg. Ref. F19A/0521) Outlined in Blue, and the Proposed Development Outlined in Pink

(Source: Contiguous Eastern Elevation Submitted at RFI Stage Under Reg. Ref. F17A/0714 & F19A/0521, Submitted Drawing No. '0514' by Coady Architects, All Annotated by Thornton O'Connor Town Planning, 2024)

4.7 Separation Distances

The proposed apartment building is cognisant of the potential impact to the amenity of neighbouring dwellings to the west and south of the site as well as the impact to future residents of the apartments.

The public open space located between the subject site and the dwellings in Seamount View, as well as the R106 between the subject site and the apartments in St. Werburghs, will provide sufficient relief to ensure there will be no impact to the amenity of local residents. As illustrated on the proposed Site Layout Plan, the separation distance between the western elevation of the proposed apartment block and the eastern elevation of the closest dwelling in Seamount View (No. 30) is a generous c. 49.7 No. metres. Furthermore, the separation distance between the southern elevation of the proposed apartment block and the northern elevation of St. Werburghs apartment building is c. 52.86 No. metres. This is illustrated in Figure 4.10.

As illustrated in Figure 4.10, the separation distance between the closest opposing windows of the western and eastern apartments within the scheme is 23.42 No. metres whilst the

distance between northern and southern apartments is 45 No. metres, ensuring the privacy and amenity of future residents is protected.



Figure 4.10: Proposed Separation Distances Between the Proposed Development and Neighbouring Dwellings and Within the Development Itself

(Source: Drawing No. '0503' by Coady Architects, Annotated by Thornton O'Connor Town Planning, 2024)

4.7 Open & Amenity Spaces

4.7.1 Public Open Space

The proposed development seeks to provide 1,047 sq m of public open space, which equates to 13% of the total site area. The public open space will be located in the northern portion of the site and will be accessed via the northern corner of the site and various other access points along the eastern, western and southern boundary, as illustrated in Figure 4.11 below.

This space will provide an informal play area, including a series of play equipment that caters more specifically to incidental and natural play, as illustrated in Figure 4.12. The space will also provide a large green lawn, that also acts as a detention basin as a main SuDS feature, as well as general meeting spaces provided with seating which aims to promote socialisation and interaction amongst member of the public, as illustrated in Figure 4.13.

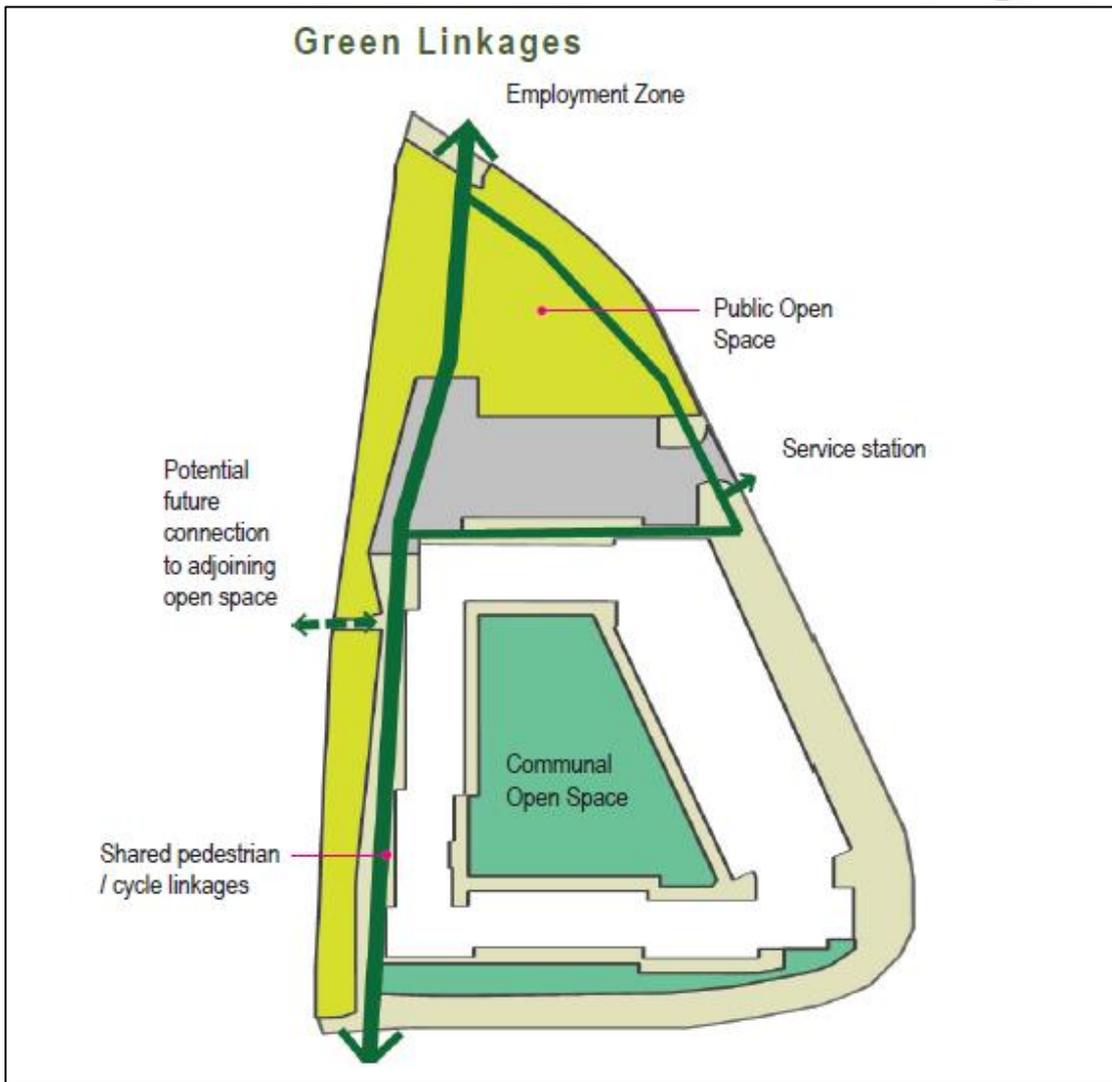


Figure 4.11: Linkages to the Proposed Public Open Space

(Source: *Landscape Report by Áit Urbanism + Landscape, 2024*)



Balancing beams

Balancing ropes

Stepping logs

Figure 4.12: Example of Play Equipment to be Provided in the Proposed Public Open Space

(Source: *Landscape Report* by Áit Urbanism + Landscape, 2024)



Figure 4.13: Example of Kickabout Space / Detention Basin

(Source: *Landscape Report* by Áit Urbanism + Landscape, 2024)

4.7.2 Communal Amenity Space

The proposed development will provide 1,011 sq m of communal amenity space, including 79 sq m of internal space and 932 sq m of external space.

The internal communal space is provided at ground floor level, within the south-eastern extent of the building. This will provide residents with the option of socialising and interacting with one another indoors.

The external communal space is located in the centre of the courtyard-style building and along the southern boundary of the site. The courtyard comprises 650 sq m of communal space and will provide play space, a social hub, and extensive semi-private landscaped area for residents of the proposed development to enjoy, as illustrated in Figure 4.14 and 4.15. The communal space along the southern boundary of the site will provide 282 sq m of green space, seating and sensory planting, as illustrated in Figure 4.14.

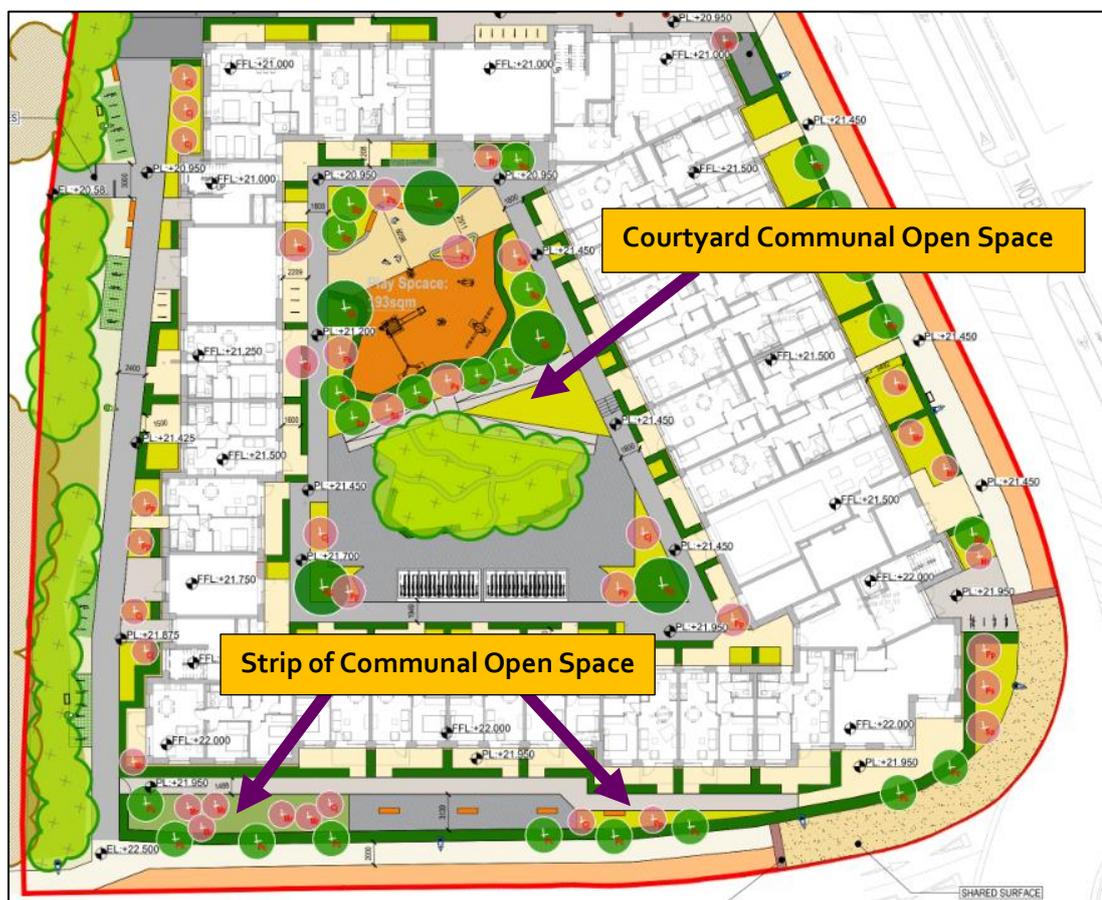


Figure 4.14: Proposed Communal Open Space within the Courtyard and Along the Southern Boundary of the Site

(Source: Drawing No. '23FG03-DR-0200' by Áit Urbanism + Landscape, Annotated by Thornton O'Connor Town Planning, 2024)



Figure 4.15: CGI of the Communal Amenity Space in the Courtyard When Viewed from Fourth Floor Level

(Source: *Architectural Design Statement by Coady Architects, 2024*)

4.7.3 Private Open Space

The proposed development seeks to provide private open space in the form of balconies and terraces for each residential unit. The balconies and terraces have a minimum depth of 1.5 metres and are directly accessible from the main living spaces in the units. The private amenity space for the 1-bed units range in size between 5.3 sqm and 14.2 sqm, between 6 sq m and 7 sq m for the 2-bed (3-persons) units, and 7 sq m and 10.3 sq m for the 2-bed (4-persons) units.

4.8 Car, Bicycle & Motorcycle Parking

In total, the proposed development comprises 24 No. car parking spaces, including 2 No. accessible spaces, 6 No. EV Charging space and 6 No. car club spaces. The car parking area is located to the north of the building, as identified in Figure 4.16, and is accessed along the eastern boundary from the access road currently serving the Applegreen Service Station.



Figure 4.16: Location and Layout of the Proposed Car Parking

(Source: Drawing No. '0503' by Coady Architects (Left) and Drawing No. '23FG03-DR-0200' by Áit Urbanism + Landscape (Right), Annotated by Thornton O'Connor Town Planning, 2024)

The proposed development will include a total of 404 No. cycle parking spaces, including 274 No. long-term (residents) spaces and 130 No. short-term (visitor) spaces.

The visitor parking spaces will be provided in various locations across the site in the form of Sheffield stands.

The residents bicycle parking is proposed in 4 No. bike stores at ground floor level of the building, and 2 No. stores are in the southern extent of the courtyard, as identified in Figure 4.17. The bike stores are equipped for a mix of bicycle parking types including standard, larger/heavier cargo, e-bike charging spaces as well as stacked lockers that can store foldable bicycles and additional ancillary equipment such as scooters and helmets. A bicycle maintenance hub will also be provided in one of the bike stores. More details of each bicycle store is discussed further below.

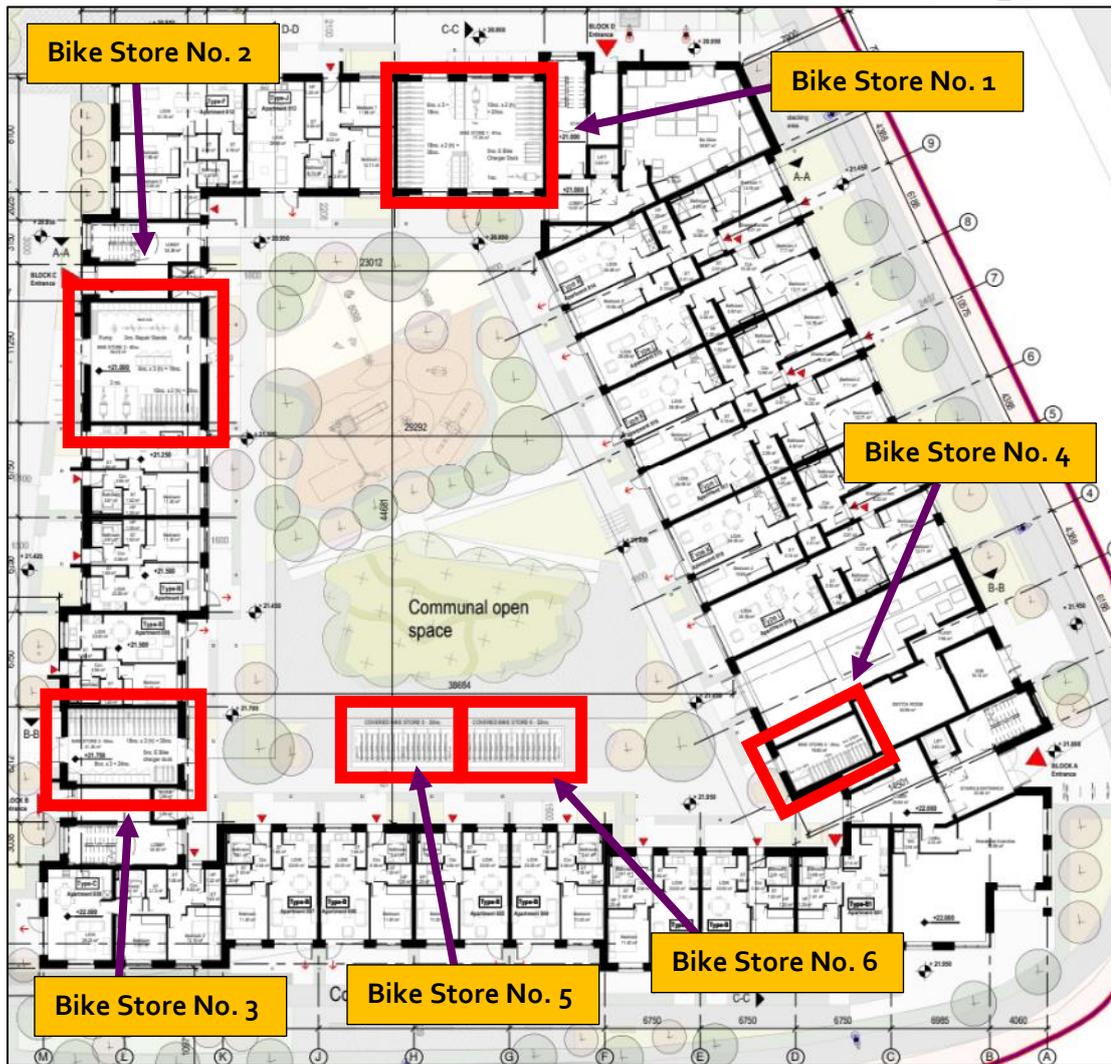


Figure 4.17: Location of the Proposed Long-Term Residents Bicycle Parking

(Source: Drawing No. '0506' by Coady Architects, Annotated by Thornton O'Connor Town Planning, 2024)

Bike Store No.1:

Bike Store No. 1 will be located in the northern portion of the building with an entrance proposed along the outer extent of the building and within the courtyard for ease of access for residents. This store will provide 56 No. stacked spaces (28 No. two-tier racks), 18 No. lockers for foldable bikes, 2 No. cargo spaces and 5 No. e-bike charging spaces, totalling to 81 No. spaces. There will also be 36 No. additional lockers for the storage of ancillary equipment.

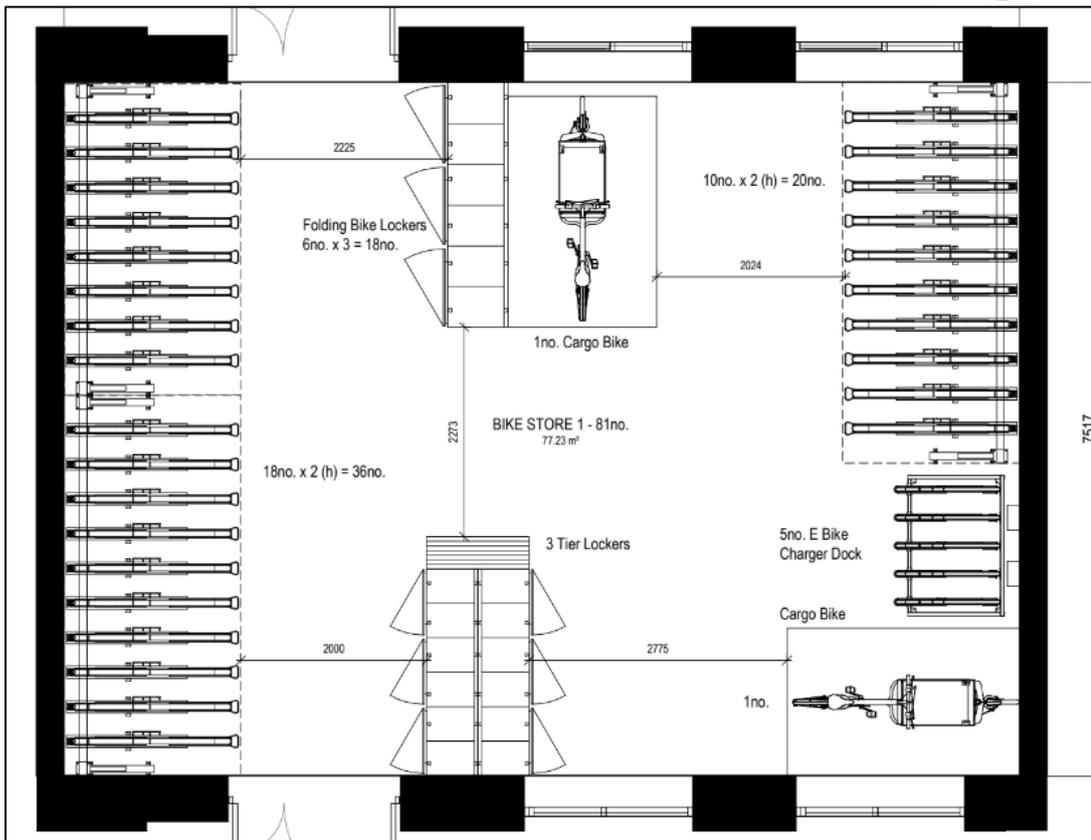


Figure 4.18: Layout of the Bike Store No. 1

(Source: Drawing No. '0523' by Coady Architects, 2024)

Bike Store No. 2:

Bike Store No. 2 will be located in the western portion of the building with an entrance proposed along the outer extent of the building and within the courtyard for ease of access for residents. This store will provide 20 No. stacked spaces (10 No. two-tier racks), 2 No. cargo spaces and 18 No. foldable bike lockers, totalling to 40 No. spaces. There will also be 54 No. additional lockers for the storage of ancillary equipment. A bike hub with repair stands and wheel pumps will also be provided in this store to assist with any bicycle maintenance.

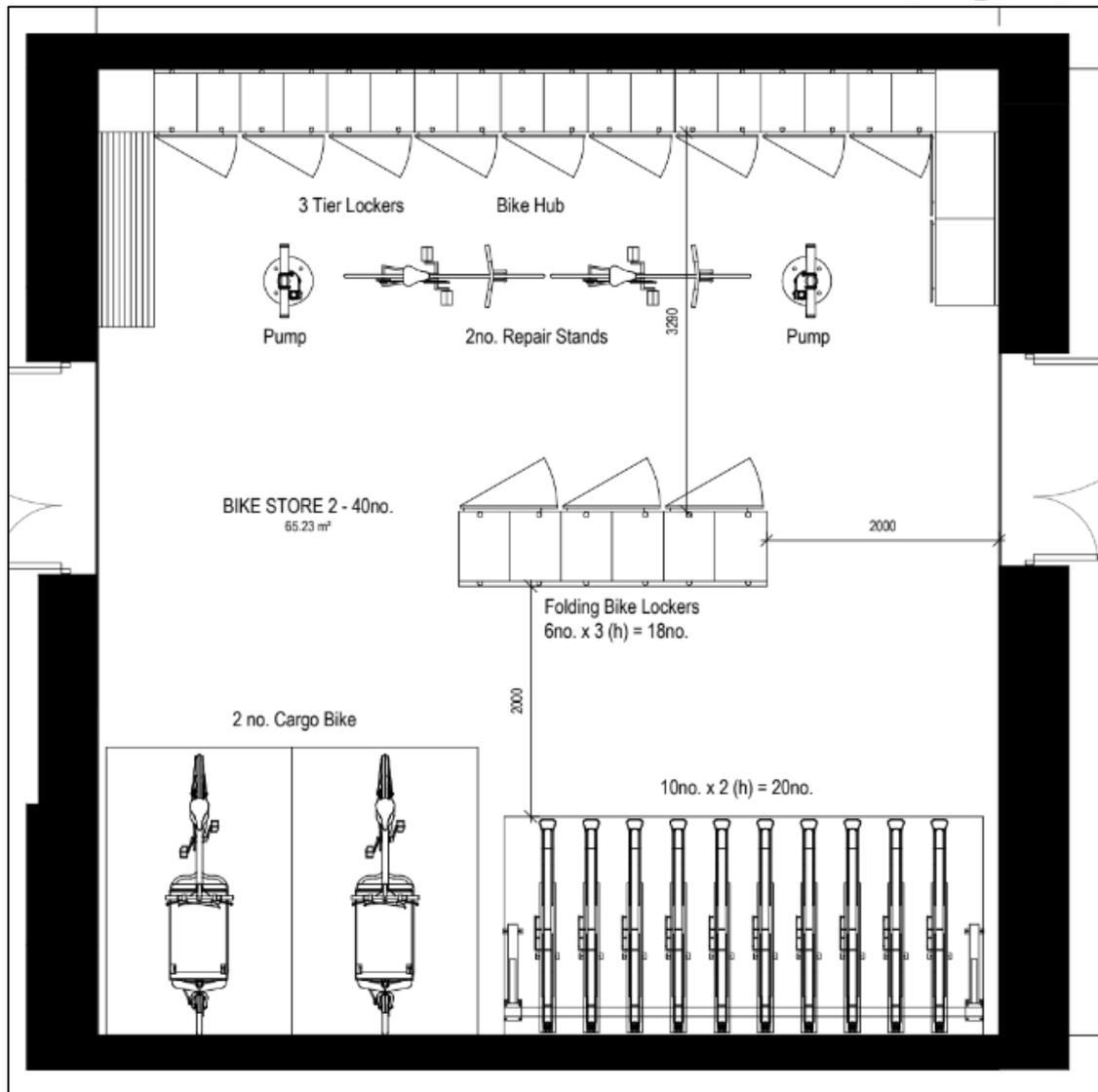


Figure 4.19: Layout of the Bike Store No. 2

(Source: Drawing No. '0523' by Coady Architects, 2024)

Bike Store No. 3:

Bike Store No. 3 will be located in the south-western portion of the building with an entrance proposed along the outer extent of the building and within the courtyard for ease of access for residents. This store will provide 36 No. stacked spaces (18 No. two-tier racks), 5 No. e-bike charging spaces and 24 No. foldable bike lockers, totalling to 65 No. spaces. There will also be 18 No. additional lockers for the storage of ancillary equipment.

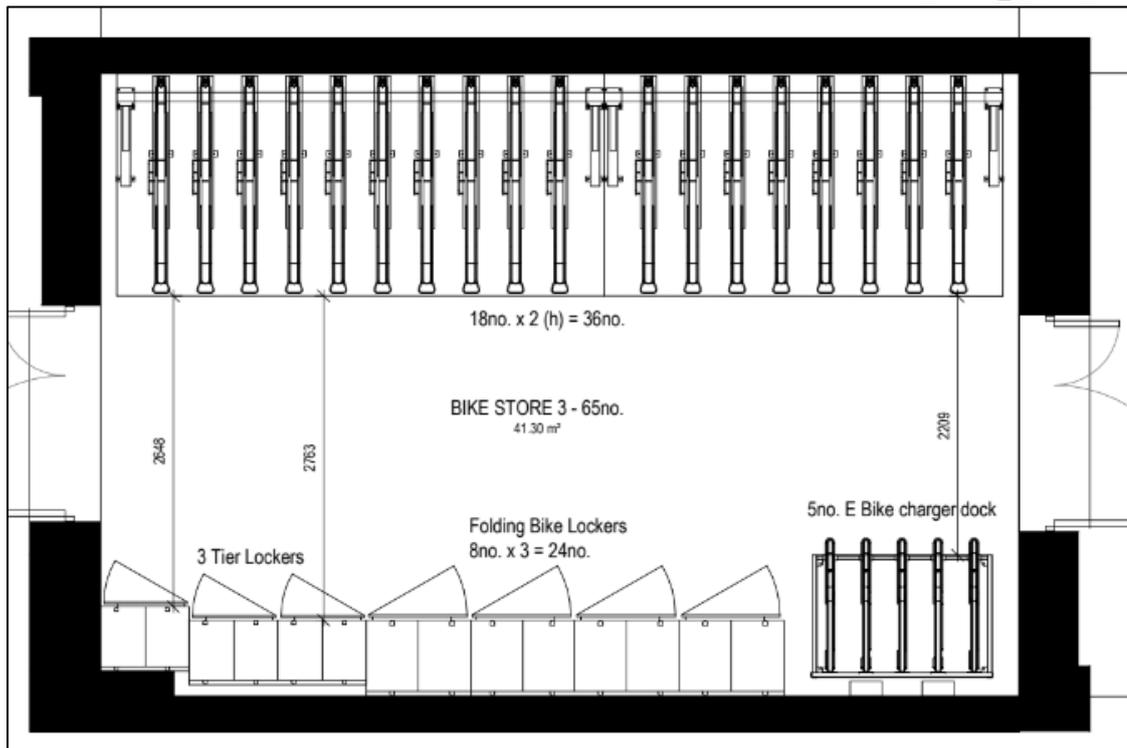


Figure 4.20: Layout of the Bike Store No. 3

(Source: Drawing No. '0523' by Coady Architects, 2024)

Bike Store No. 4:

Bike Store No. 4 will be located in the south-eastern portion of the building with an entrance proposed within the courtyard. This store will provide 10 No. standard spaces, 5 No. e-bike charging spaces and 3 No. foldable bike lockers, totalling to 24 No. spaces.

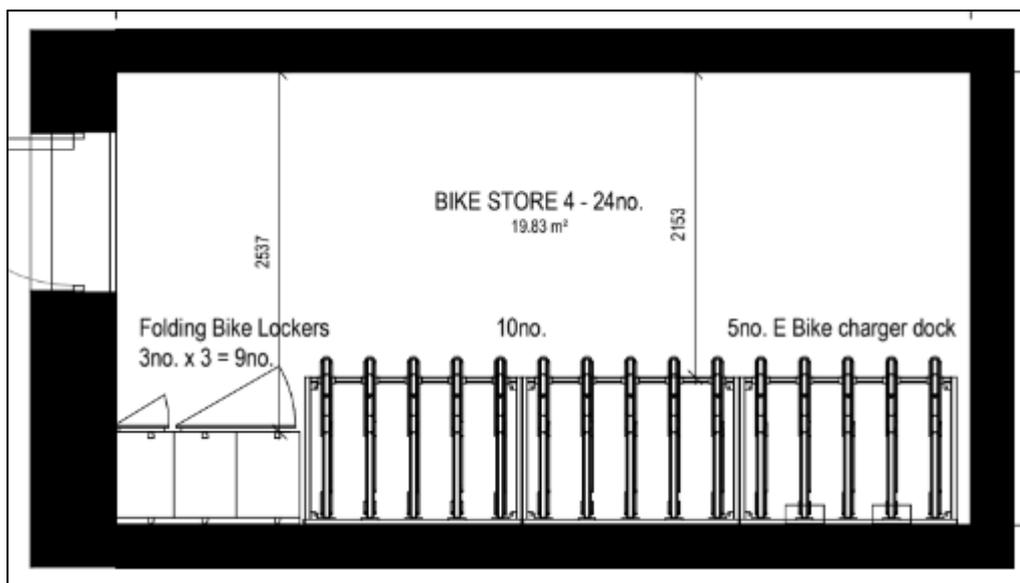


Figure 4.21: Layout of the Bike Store No. 4

(Source: Drawing No. '0523' by Coady Architects, 2024)

Bike Stores No. 5 & 6:

Bike Stores No. 5 & 6 will be located in the southern extent of the courtyard and will provide 32 No. stacked spaces (16 No. two-tier racks) each, equating to 64 No. spaces.

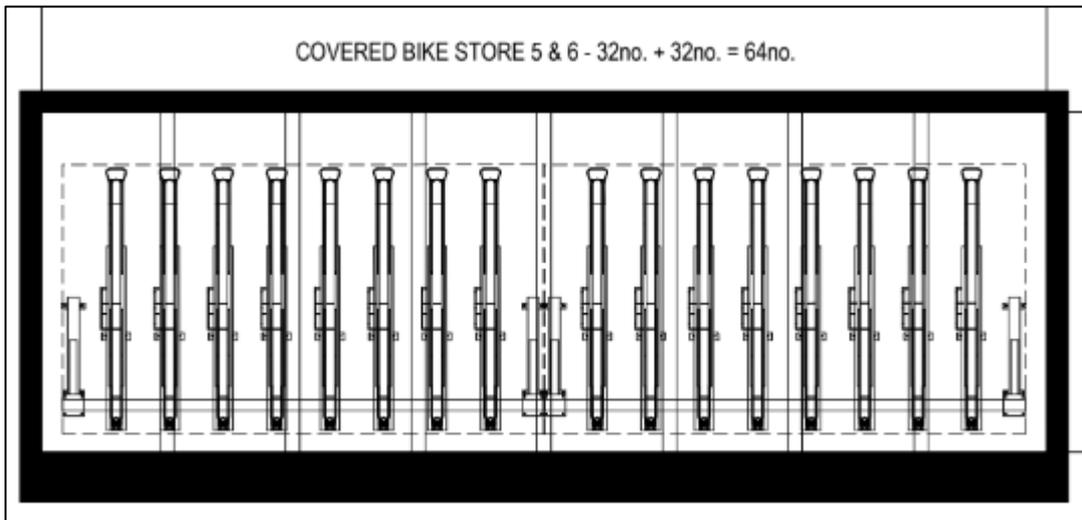


Figure 4.22: Layout of the Bike Store Nos. 5 & 6

(Source: Drawing No. '0523' by Coady Architects, 2024)

In total, there will be 176 No. stacked spaces (88 No. two-tier racks), 10 No. standard spaces, 4 No. cargo spaces, 15 No. e-bike charging spaces, 69 No. foldable bike lockers and a bicycle hub. It is therefore considered that the proposed development provides a more diverse range of bicycle space types to cater for various types and sizes of bicycles, as well as providing additional locker space for the storage of ancillary equipment, compared to the proposal submitted at Opinion Stage.

The location of the bike stores in different areas of the building and their entrances along both the outer envelope of the building and within the courtyard, provides convenient access and ensures there will be excellent passive surveillance for the safety of residents. It is considered that the proposed quantum, quality and range of bicycle parking spaces is appropriate to cater for residents and visitors of the development.

In addition to the proposed car and bicycle parking, there will be 2 No. motorcycle space provided to the west of the car parking spaces, as identified in Figure 4.23 below.

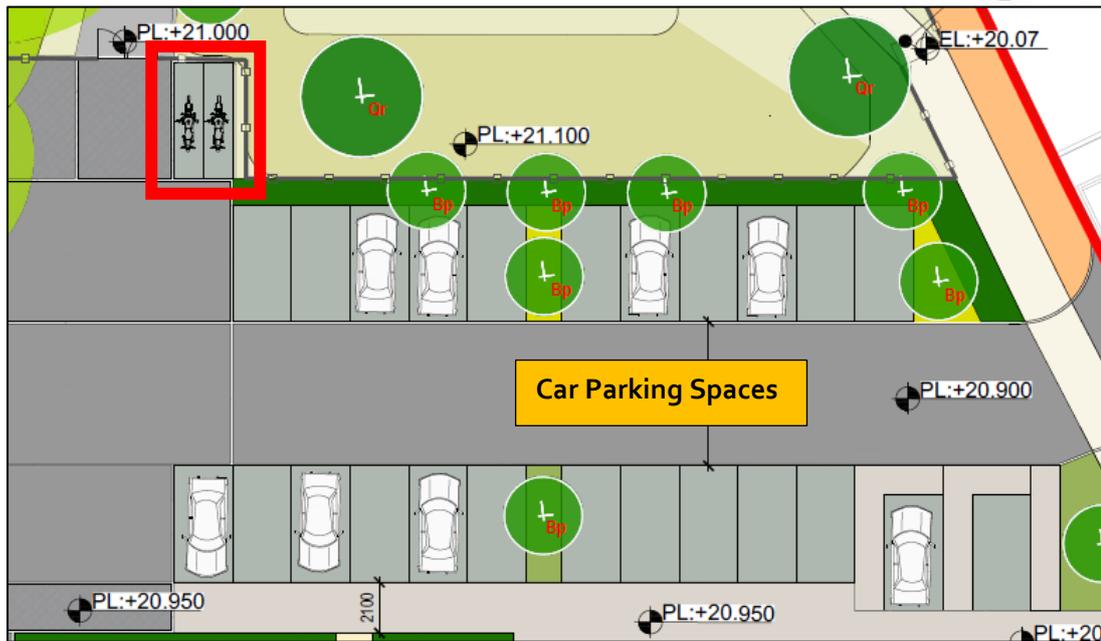


Figure 4.23: Location of the Proposed Motorcycle Parking

(Source: Drawing No. '23FG03-DR-0200' by Áit Urbanism + Landscape, Annotated by Thornton O'Connor Town Planning, 2024)

4.9 Summary of the Proposed Development

As set out throughout this Section, the proposed development will provide a high-quality Residential Development comprising 123 No. units of various sizes on this underutilised and appropriately zoned suburban site which will contribute positively towards addressing the critical shortage of housing supply during a time when high demand has caused a National Housing Crisis. The proposed development will provide a high-quality living environment that provides opportunities for social interaction and integration amongst future residents of the development and local members of the public.

The scheme layout has been carefully considered having regard to the size of the site, the 12% public open space requirement and the need to provide much needed housing in a suitable and accessible location. The proposed building height is considered acceptable given the planning history at the site, which permitted up to 6 No. storeys, and the ideal location of the site to provide high-density developments and taller buildings.

5.0 STATEMENT OF CONSISTENCY - NATIONAL PLANNING POLICY

This section will demonstrate that the proposed development has been brought forward with due consideration of National Policy and is consistent with the objectives and guidance as set out within each of the respective policy documents. Within this section the development will be assessed against:

14. *Project Ireland 2040 – The National Development Plan 2021-2030;*
15. *Project Ireland 2040: National Planning Framework;*
16. *Action Plan for Housing and Homelessness, Rebuilding Ireland;*
17. *Housing for All – a New Housing Plan for Ireland, September 2021;*
18. *Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018);*
19. *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, 2023;*
20. *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007);*
21. *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024);*
22. *Design Manual for Urban Roads and Streets (2019);*
23. *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009);*
24. *Guidelines for Planning Authorities on Childcare Facilities (2001)*
25. *Part V of the Planning and Development Act 2000 (as amended); and*
26. *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (2009).*

5.1 **Project Ireland 2040 – The National Development Plan 2021-2030**

The *National Development Plan 2021 – 2030*, ('NDP') document was published in 2021 as an updated version of the previous *National Development Plan 2018 – 2027*.

As part of *Project Ireland 2040* the *NDP* sets out the Government's over-arching investment strategy and budget for the period 2021-2030. It is an ambitious plan that balances the significant demand for public investment across all sectors and regions of Ireland with a major focus on improving the delivery of infrastructure projects to ensure speed of delivery and value for money.

The *NDP* sets out funding to underpin key Government priorities. Specifically, allocations will support the realisation of critical goals laid out in *Housing for All – a New Housing Plan for Ireland, September 2021* and will enable a step-change in investment to ameliorate the effects of climate change. The *NDP* underpins the overarching message of the *National Planning Framework*.

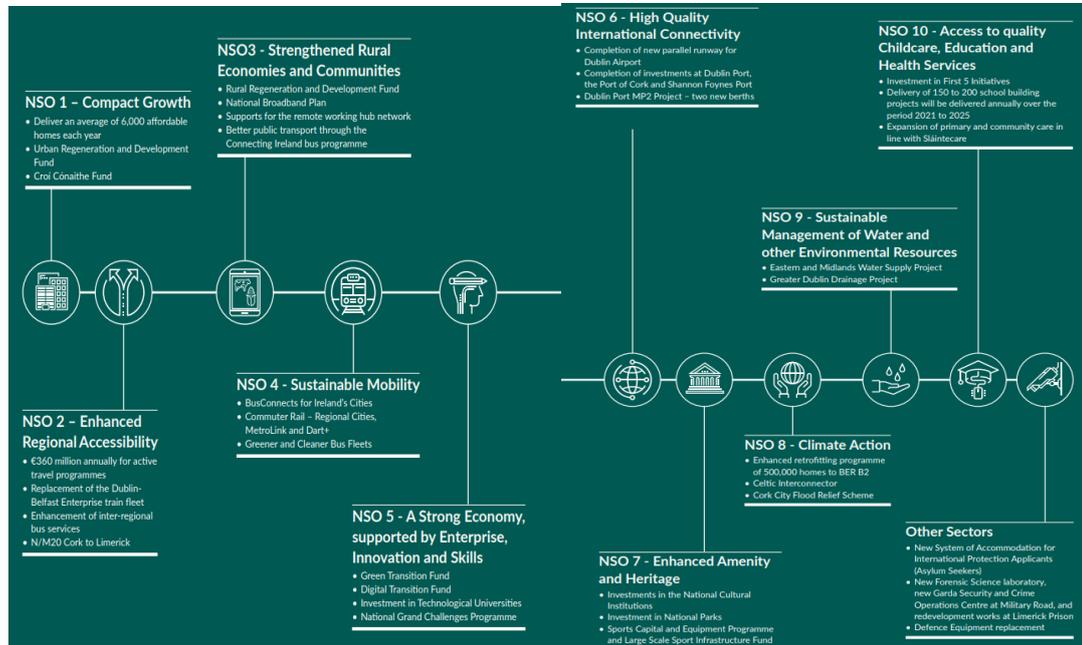


Figure 5.1: Major Investments – National Strategic Outcomes

(Source: *National Development Plan 2021-2030*)

The *National Planning Framework* has 10 No. National Strategic Outcomes, which are referenced in the *NDP*. The relevant strategic outcomes and objectives are discussed below at Section 5.2 of this report.

5.2 Project Ireland 2040: National Planning Framework

5.2.1 Introduction

Project Ireland 2040: National Planning Framework ('*NPF*') is the Government's high-level overarching strategic plan that aims to shape the future growth and development of the country. The *NPF* is a long-term Framework that sets out how Ireland can move away from the current 'business as usual' pattern of development.

As set out in Section 6.6 of the *NPF*, a core principle of the *NPF* is to "allow for choice in housing location, type, tenure and accommodation in responding to need", and to "tailor the scale and nature of future housing provision to the size and type of settlement where it is planned to be located."

Therefore, we submit that the provision of 123 No. high-quality residential units, comprising a mix of 1 and 2 No. bedroom apartments units at the subject site will contribute to achieving this core principle of the *NPF*.

Furthermore, Section 6.6 of the *NPF* states that:

"while apartments made up 12% of all occupied households in Ireland and 35% of occupied households in the Dublin City Council area in 2016 (Census data), we are a long way behind European averages in terms of the numbers and proportion of households living in apartments, especially in our cities and larger towns. In many European countries, it is normal to see 40%-60% of households living in apartments."

This Section in the *NPF* further calculates that:

*"Between 2018 and 2040, an average output of at least 25,000 new homes will need to be provided in Ireland every year to meet the needs for well-located and affordable housing, **with increasing demand to cater for one and two-person households.**"*
[Our Emphasis]

Furthermore, it is noted that *"achieving this level of supply will require increased housing output into the 2020's to deal with a deficit that has built up since 2010."*

The *NPF* highlights at Section 6.6 that 7 No. out of 10 No. households in the state consist of three people or less. **[Our Emphasis]** The policy document denotes that:

"...meeting the housing requirements arising in major urban areas for people on a range of incomes will be a major priority for this framework and the actions flowing from it".

The proposed development is a direct response to the national housing shortage that is readily reported and identified in recent planning policy. The proposed development is consistent with the policy objectives as set out throughout this section, as it provides much needed 1 No. to 2 No. bedroom units.

Section 2.2 of the *NPF* sets out an overview of the *NPF* Strategy which includes reference to 'Compact Growth' as follows:

- *"Targeting a greater proportion (40%) of future housing development to be **within and close to the existing 'footprint' of built-up areas.***
- ***Making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.**"* **[Our Emphasis]**

The *NPF* expressly seeks the densification of infill sites close to public transport and services and facilities such as the subject site. National Policy Objective 35 states that it is an objective to:

"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."

The *NPF* also sets out the following regarding future growth needs in Section 6.6:

"Increased residential densities are required in our urban areas...to more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to build inwards and upwards, rather than outwards."

This means that apartments will need to become a more prevalent form of housing, particularly in Ireland's cities."

The *NPF* recognises that building inwards and upwards is important to effectively address the housing crisis. Therefore, we consider that there is a significant importance placed in the *NPF* to develop high quality accommodation by increasing the density of developments in the Dublin.

In our professional planning opinion, the *NPF* supports the provision of the proposed development through increased density and height at the subject site having regard to the design of the development which considers existing residential amenity, its proximity to public transport and local amenities, and the express requirement of national policy to increase densities. It is noted that the height has been previously supported by Fingal County Council and An Bord Pleanála.

5.2.2 National Strategic Outcomes and Objectives

Section 10.3 of the *NPF* identifies a list of 10 No. National Strategic Outcomes (NSOs) which sets out the vision of the *NPF* (to create a shared set of goals for every community across the country) as follows:

1. Compact Growth;
2. Enhanced Regional Accessibility;
3. Strengthened Rural Economies and Communities;
4. Sustainable Mobility;
5. A strong Economy supported by Enterprise, Innovation and Skills;
6. High Quality International Connectivity;
7. Enhanced Amenity and Heritage;
8. Transition to a Low Carbon and Climate Resilient Society;
9. Sustainable Management of Water, Waste and other Environmental Resources; and
10. Access to Quality Childcare, Education and Health Services.

The table below sets out how the proposed development will contribute towards achieving the 10 No. NSOs identified in the *NPF* as follows:

Consistency with National Strategic Outcomes			
No.	Objective?	How it is Addressed by this development?	Meet criteria?
1:	Compact Growth;	Sustainable and efficient development of a key underutilised, infill site in an existing urban area surrounded by development.	Yes
2:	Enhanced Regional Accessibility;	The proposed MetroLink will provide a station in Swords, 'Swords Central Station', which will be approximately 800 metres (c. 10-minute walk) to the south-west of the site along the R132.	Yes
3:	Strengthened Rural Economies and Communities;	N/A – Urban Area	N/A

4:	Sustainable Mobility;	Promoting active and sustainable transport due to proximity of high-quality public transport, provision of 404 No. bicycle parking spaces. A reduced provision of car parking has been provided to promote sustainable modes of transport and 6 No. electric vehicle parking spaces are provided in addition to 6 No. car share spaces.	Yes
5:	A Strong Economy supported by Enterprise, Innovation, and Skills;	The site is directly adjacent to the Swords Business Park and is in close proximity to Swords Town Centre, which demonstrates the accessible location of the lands.	Yes
6:	High Quality International Connectivity;	N/A –Relates to Ports and Airports	N/A
7:	Enhanced Amenity and Heritage;	The scheme provides a high level of amenity space for future residents with the provision of external communal open space (932 sq m), internal communal amenity space (79 sq m), public open space (1,142 sq m) and environmental open space (589 sq m). A footpath and bicycle path is provided around the south and eastern perimeter of the site, with linkages proposed on all boundaries of the site for increased permeability and connectivity, further enhancing the amenity for the area.	Yes
8:	Transition to a Low Carbon and Climate Resilient Society;	<p>The proposed development will be subject to a detailed design which prioritises the energy performance of the building. A <i>Climate Action Energy Statement</i> prepared by J.V. Tierney & Co details the strategy to address various climate mitigation actions in the built environment. Green Roofs and SuDS infrastructure have also been included within the design of the subject scheme to achieve a high energy rating and compliance with building standards.</p> <p>The reduced car parking ratio proposed encourages a transition to a low carbon community. The provision of bicycle parking spaces, car share spaces and electric vehicle parking spaces will also promote sustainable modes of transport and help reduce carbon dioxide emissions associated with private car usage.</p>	Yes
9:	Sustainable Management of Water, Waste and other Environmental Resources; and	Please see enclosed the <i>Operational Waste Management Plan</i> prepared by AWN Consulting and the <i>Climate Action Energy Statement</i> prepared by J.V. Tierney & Co.	Yes

		<p>Sustainable management of use, management of water use, and waste output are detailed in the accompanying reports.</p> <p>Sustainable modes of transport are encouraged with the limited number of car-parking spaces proposed.</p>	
10:	Access to Quality Childcare, Education, and Health Services;	It is considered that there is sufficient existing provision of childcare, education, healthcare and social infrastructure in the vicinity of the site that can serve the proposed development. Please refer to the accompanying <i>Childcare Demand Assessment</i> , <i>School Demand Assessment</i> and the <i>Social Infrastructure Audit</i> prepared by Thornton O'Connor Town Planning which provides greater detail.	Yes

5.2.3 National Policy Objectives

A series of key National Policy Objectives ('NPOs') are also defined by the *NPF* and are the more detailed means through which the NSOs will be achieved. **NPO 74** states that proposals should "secure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes.". We have carried out an assessment of the NPOs and have identified the relevant objectives that are applicable to the proposed development.

The relevant NPOs that are applicable to the proposed development are discussed under the following headings:

- Population Growth and Employment;
- Current Trends in Tenure and Household Formation in Ireland;
- Sustainable Modes of Transport;
- Scale, Massing and Design; and
- Waste Environmental Issues.

5.2.3.1 Population Growth and Employment

The *NPF* sets out a number of planning policy objectives that specifically relate to the population growth in Ireland and in particular the 5 No. main cities. The following objectives are considered to be the most relevant to the subject scheme of this planning application:

- **National Policy Objective 1b** projects an additional population of approximately 490,000 – 540,000 No. people in the Eastern and Midland Region.
- **National Policy Objective 2a** sets a target of 50% of future population and employment growth to be focused in the existing five cities and their suburbs.

- **National Policy Objective 3a and 3b** aim to deliver at least 40% of all new homes nationally, within the build-up of existing settlements and to deliver at least 50% of all new homes that are targeted in the five Cities within their existing built-up footprints.
- **National Policy Objective 4** aims to provide diverse and integrated communities ensuring the creation of attractive, liveable, well designed, high quality urban places.
- **National Policy Objective 5** aims to 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 8** aims to ensure the targeted pattern of population growth of Ireland’s cities to 2040 is in accordance with the targets. The targeted population growth for Dublin (city and suburbs) is a 20-25% increase from 1,173,000 No. (2016) to 1,408,000 No. (2040).
- **National Policy Objective 35** aims to support increased residential density in settlements through infill development schemes, area or site-based regeneration and increased building heights.

The development will facilitate the projected growth in population in the Eastern and Midland Region as identified in NPO 1b.

A core principle of the *NPF* set out in Section 6.6 states that proposals should:

"Prioritise the location of new housing provision in existing settlements as a means to maximizing a better quality of life for people through accessing services; ensuring a more efficient use of land and allowing for greater integration of existing infrastructure." [Our Emphasis]

The proposed development is located on a corner, infill site in an urban location that is built-up, well served by public transport and in close proximity to services and facilities.

As such the proposed development is consistent with NPOs 2a, 3a and 3b which aim to provide 50% of future population and employment growth within the existing five main cities, 40% of new homes within the build-up of existing settlements and 50% of all new homes within the existing built-up footprints. The *NPF* recognises that to achieve the targets set out in NPOs 3a and 3b of the framework which relate to the delivery of new homes, housing outputs will undoubtedly necessitate a significant increase of apartment type developments. NPO 8 requires targeted population growth for Dublin city and suburbs and the proposed development will contribute towards increasing the population of this area of Dublin.

Furthermore, it is noted that in Section 6.6, *"achieving this level of supply will require increased housing output into the 2020's to deal with a deficit that has built up since 2010."*

The open spaces are high quality, attractive and liveable spaces where existing and future residents will have the opportunity to interact with each other, ensuring an integrated community within the scheme. Therefore, it is considered that the proposal will contribute to creating a well-designed and high-quality urban place as set out in NPO 4 and will ensure the site is sustainably developed contributing towards achieving NPO 5 which aims to

develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.

The proposed scheme will involve the development of an underutilised, infill, corner site in an existing built-up area. The proposed part 4 No. to part 5 No. storey building will be marginally taller than the surrounding area, however, to promote an increase in population, NPO 35 supports increased residential density through taller developments on underutilised and infill sites. The development will encourage social interaction between the residents of the scheme particularly by providing high-quality attractive public and communal spaces, creating a strong sense of community. The proposed development is consistent with the NPOs set out within this Section.

5.2.3.2 Current Trends in Tenure and Household Formation in Ireland

The *NPF* acknowledges at Section 4.5 that Ireland's housing crisis has resulted in:

"A time when many people, including those on average incomes, wish to live close to where they work and the services and amenities necessary to enjoy a good quality of life, they struggle to do so because the urban housing market has become constrained."

The following NPOs respond to the changing nature of household formation and trends in tenure in current planning discourse.

- **National Policy Objective 6** acknowledges the need to regenerate and rejuvenate cities, towns and villages of all types and scale that can accommodate changing roles and functions in terms of their residential population, employment activity, levels of amenity and design quality in order to sustainability influence the surrounding area.
- **National Policy Objective 11** states that 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.
- **National Policy Objective 32** notes a target of delivering 550,000 No. additional households to 2040.

In accordance with NPOs 6, 11 and 32, the development will revitalise this corner site, opening up the site for the public to utilise (i.e. public open space) while also providing much needed housing for the area, which will encourage more people to live in the existing urban footprint whilst also contributing towards generating more activity within the existing urban area and will contribute towards the target of delivering 550,000 No. additional households to 2040.

The *NPF* highlights at Section 6.6 that 7 No. out of 10 No. households in the State consist of three people or less. In terms of changing family size, *"in Dublin city, one, two and three-person households comprise 80 percent of all households."* The document denotes that *"...meeting the housing requirements arising in major urban areas for people on a range of incomes will be a major priority for this framework and the actions flowing from it."* [Our Emphasis]

The proposed development provides 123 No. residential units which will positively contribute towards addressing the deficit in housing supply within Dublin. The

development offers high quality accommodation at a time when the *NPF* acknowledges the constrained urban housing market. The scheme represents sustainable development as the site is situated in an existing residential area and the future residents of the scheme will benefit from the site's close proximity to public transport, employment, services and facilities.

5.2.3.3 Sustainable Modes of Transport

The *NPF* sets out a number of planning policy objectives that specifically relate to Sustainable Modes of Transport. The following objectives are considered to be the most applicable to the proposed development at the subject site.

- **National Policy Objective 26** outlines the objectives of integrating Public Health Policy such as Healthy Ireland and the National Physical Activity Plan with planning policy.
- **National Policy Objective 27** aims to 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.

The scheme will front a key roundabout along the R106. The proposed development provides for 24 No. car parking spaces, providing a ratio of 0.19 No. spaces per unit. The total car parking includes 10 No. standard spaces, 6 No. car share spaces, 2 No. accessible spaces and 6 No. EV parking spaces.

The proposed development actively encourages the use of sustainable modes of public transport through the discouragement of car ownership. A footpath and bicycle path is provided around the south and eastern perimeter of the site, with linkages proposed on all boundaries of the site for increased permeability and connectivity, further enhancing the amenity for the area and encouraging people to engage in regular physical activity.

The subject site is located in an area served by existing and future public transport and adjacent to Swords Business Park, which provides a wide range of employment opportunities. Swords Main Street is located c. 1.2 km from the site, whilst the Pavilions Shopping Centre is located c. 950 metres away. Multiple bus stops are located in close proximity to the site that provide numerous bus services, and the future Metro Swords Central Station will be approximately 800 metres (c. 10-minute walk) from the site. Therefore, a range of services and facilities can be easily accessed from the subject site by bike or on foot. The proposed development includes 404 No. bicycle parking spaces to support and encourage cycling as a transport mode.

The proposed development is consistent with NPOs 26 and 27 as set out above.

5.2.3.4 Scale, Massing and Design

The *NPF* sets out a number of planning policy objectives that specifically relate to the scale, massing and design of developments. The following objectives are considered relevant to the proposed development:

- **National Policy Objective 13** outlines that in urban areas, building height and car parking standards will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth.
- **National Policy Objective 33** prioritises the provision of residential development at appropriate scales within sustainable locations.
- **National Policy Objective 35** notes the aim to increase residential density in settlements through a range of measures including (amongst others) in-fill development schemes and increased building heights.

It is our professional planning opinion that the subject scheme has been designed at an appropriate scale within the surrounding context and represents the appropriate densification of this key underutilised site, contributing positively to the regeneration of the subject site, particularly due to the scheme's high-quality design, siting, layout and mix of apartment units.

It is considered that the scheme design strikes a balance between respecting the surrounding environment of the scheme and ensuring the development potential of a strategically positioned and underutilised plot is maximised and appropriately densified in accordance with the objectives of the *NPF*.

The *Landscape and Visual Impact Assessment* and *BRE Daylight & Sunlight Assessment* submitted demonstrate that no significant material impacts will occur as a result of the proposed development. The layout of the development has been thoroughly considered and the scheme is positioned away from nearby residential dwellings.

In line with NPO 13, the *Fingal Development Plan 2023-2029, Sustainable Urban Housing: Design Standards for New Apartments, 2023*, the *Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities (2007)* and the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024)*, set out the specific standards for residential developments, as discussed in this report. The proposed development is also appropriate in terms of scale, mass and height in responding to NPO 33. In addition, the proposed development provides increased height and density in an existing built-up area, which is therefore in accordance with NPO 35.

5.2.3.5 Waste and Environmental Issues

The *NPF* sets out a number of planning policy objectives that specifically relate to Waste and Environmental Issues. The following objectives are considered relevant to the proposed residential development:

- **National Policy Objective 52** sets out that the planning system must respond to the environmental challenges and have regard to relevant environmental legislation.
- **National Policy Objective 53** is concerned with supporting greater land efficiency and use of renewable resources by reducing the rate of urban sprawl and new development.

- **National Policy Objective 54** aims to reduce the carbon footprint in the planning system.
- **National Policy Objective 56** sets out the intentions for sustainably managing waste.
- **National Policy Objective 58** states that Green Infrastructure and ecosystem services will be incorporated into the preparation of statutory land use plans.
- **National Policy Objective 63** aims to ensure the efficient and sustainable management and conservation of water resources and water services infrastructures.
- **National Policy Objective 64** aims to improve air quality through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport.
- **National Policy Objective 65** supports the aims of the Environmental Noise Regulations.
- **National Policy Objective 75** stipulates that *“all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.”*

The subject site is a key underutilised site ideally located for residential units given its proximity to Swords Main Street, employment locations and existing and planned public transport and thus the development of these underutilised lands is in accordance with the waste and environmental policies outlined above.

The proposed scheme has had regard to relevant environmental legislation as set out in the enclosed reports in accordance with NPO 52. The development will support the efficient use of core urban land and will contribute towards reducing the rate of urban sprawl in accordance with NPO 53.

The development of the subject site will encourage walking and cycling, in accordance with NPO 54 and NPO 64, which sets out to improve air quality through promoting development that facilitates sustainable modes of transport. The development also provides permeable links through and around the site. The proposed development will positively contribute to the surrounding area as it will enhance permeability and wider connectivity for the wider area and will contribute to the green infrastructure network (NPO 58).

In total the scheme provides 24 No. car parking spaces within the development providing a ratio of 0.2 No. spaces per unit. In addition, we note that the total car parking includes 6 No. car share spaces, 2 No. accessible spaces and 6 No. EV parking spaces.

Some 404 No. bicycle parking spaces will also be provided as part of the proposed development, including 274 No. long-term and 130 No. short-term spaces. A further 108 No. lockers are provided which could also be used for bike storage. By providing a reduced level of car parking provision, the subject scheme seeks to encourage future residents to either walk or cycle to their employment or service and facilities.

The incorporation of permeable pedestrian and cycle connections through the site ensures permeable connections are provided for future residents of the site and the wider community. The proposed scheme will therefore promote sustainable modes of transport resulting in a lower carbon footprint and will be consistent with NPO 54.

The proposed development is supported by the following reports/drawings which detail the measures which have been taken in order to meet the above policy objectives relating to waste and environmental issues, particularly in accordance with NPO 63, 65 and 75:

- *Landscape Report* prepared by Ait Urbanism + Landscape;
- *Traffic Assessment & Parking Strategy* prepared by OCSC Consulting Engineers;
- *Engineering Services Report* prepared by OCSC Consulting Engineers;
- *Arboricultural Assessment & Impact Report* prepared by CMK Hort + Arb Ltd;
- *Climate Action Energy Statement* prepared by J.V. Tierney & Co;
- *Operational Waste Management Plan* prepared by AWN Consulting;
- *Resource and Waste Management Plan* prepared by AWN Consulting;
- *Noise & Vibration Impact Assessment* prepared by AWN Consulting;
- *Ecological Impact Assessment* prepared by Enviroguide Consulting.

It is considered that the proposed development is consistent with the environmental objectives as set out in the *NPF*.

We note that in July 2024, a draft of the 6-year revision of the *NPF* was published. The draft presents revised figures in relation to expected demographic trends and notes that significantly more residential units are needed to meet the demand.

5.3 **Action Plan for Housing and Homelessness, Rebuilding Ireland**

The Action Plan for Housing and Homelessness – Rebuilding Ireland recognises that a significant increase in new homes is needed and is referenced in the long title to the *Planning and Development (Residential Tenancies) act 2016, as amended*. The Action Plan outlines a five-pillar approach:

- Pillar 1 – Address Homelessness;
- Pillar 2 – Accelerate Social Housing;
- Pillar 3 – Build More Homes;
- Pillar 4 – Improve the Rental Sector; and
- Pillar 5 – Utilise Existing Housing.

It is noted that a number of these pillars are inter-related and therefore the proposal will to an extent have a positive impact on each of the abovementioned pillars. It is considered that the proposed development directly addresses the objectives set out within Pillar 2 and Pillar 3:

- Pillar 2: Increase the level and speed of delivery of social housing and other state-supported housing.

- Pillar 3: Build More Homes – Increase the output of private housing to meet demand at affordable prices.

The publication outlines that the affordability of property in the current economic climate is the basis for the decline in home ownership. As a result, there is a growing number of households paying a greater proportion of their incomes on accommodation which has subsequent impacts on their quality of life and their ability to save.

The publication stipulates in relation to the delivery of housing that:

"the housing challenge is not simply about providing more homes – it is also about moving away from cycles of volatility in supply and affordability. Ireland needs to move towards a more stable, cost effective, affordable housing provision model that also delivers the right level of housing, in the right places and at the right time."

As discussed throughout this document, the proposed development will comprise 123 No. units (55 No. 1-bed units, 6 No. 2-bed (3-person) units and 62 No. 2-bed (4-person) units). The development will directly address the evident housing need by significantly increasing housing accommodation in this highly attractive and sought-after location and responds proportionately to the pillars as set out above, with particular emphasis on Pillars 2 and 3. Therefore, the proposed development represents the proper planning and sustainable development of the area.

The proposed development will provide additional housing options including some 24 No. social housing units, which represents nearly 20% of the proposed units in accordance with Part V of the *Planning and Development Act 2000 (as amended)*.

It has been demonstrated that the proposal subject of this Statement is consistent with the policy guidance of the *Action Plan for Housing and Homelessness, Rebuilding Ireland*.

5.4 ***Housing for All – a New Housing Plan for Ireland, September 2021***

Housing for All - a New Housing Plan for Ireland ('*Housing for All*') is the government's housing plan to 2030. It is a multi-annual, multi-billion-euro plan which will improve Ireland's housing system and deliver more homes of all types for people with different housing needs.

The overall objective of *Housing for All* is that:

"Every citizen in the State should have access to a home to purchase or rent at an affordable price, built to a high standard and in the right place, offering a high quality of life."

Section 3 of *Housing for All* states:

"An average of 33,000 homes must be provided every year between now and 2030."

The policy has 4 No. pathways to achieving *Housing for All*:

- Supporting Home Ownership 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

The pathways contain actions to be taken to achieve the objectives outlined above.

The subject scheme providing 123 No. residential units in an ideal location on a corner site, proximate to public transport, employment locations, services and facilities and will contribute towards achieving the objectives of *Housing for All*, by providing housing options in the area which will increase supply, will densify these underutilised lands and will support social inclusion by providing 24 No. Part V units. Therefore, the proposed development will contribute towards meeting the 4 No. pathways outlined in *Housing for All*.

5.5 ***Urban Development and Building Heights – Guidelines for Planning Authorities (December 2018)***

The *Urban Development and Building Heights Guidelines for Planning Authorities* ('*Building Height Guidelines*') were adopted in December 2018 under Section 28 of the 2000 Act.

The *Building Height Guidelines* state that a key objective of the *NPF* is to significantly increase the building heights and overall density of developments. The Minister's foreword to the *Building Height Guidelines* acknowledges that Ireland's classic development models for city and town cores has tended to be dominated by employment and retail uses, surrounded by extensive and constantly expanding low-rise suburban residential areas which is an unsustainable model. There is an opportunity for our cities and towns to be developed differently. Urban centres could have much better use of land, facilitating well located and taller buildings, meeting the highest architectural and planning standards. The *Building Height Guidelines* are intended to set a new and more responsive policy and regulatory framework for planning the growth and development of cities and towns upwards rather than outwards.

The *Building Height Guidelines* state that the:

"Government considers that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas." [Our Emphasis]

The *Building Height Guidelines* further note 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." [Our Emphasis]

The *Building Height Guidelines* also emphasise that increasing prevailing building heights have a critical role to play in addressing the delivery of more compact growth in our urban areas, particularly our cities and large towns through enhancing both the scale and density of development and it notes that the planning process must actively address how this objective will be secured.

The *Building Height Guidelines* also advise that taller buildings can assist in contributing to a sense of place and can indicate important street junctions:

*"Furthermore, while **taller buildings** will bring much needed additional housing and economic development to well-located urban areas, they **can also assist in reinforcing and contributing to a sense of place** within a city or town centre, such as indicating the main centres of activity, **important street junctions**, public spaces and transport interchanges. In this manner, **increased building height is a key factor in assisting modern placemaking** and improving the overall quality of our urban environments."*
[Our Emphasis]

The proposed development presents the optimal planning solution for the lands and its surrounding context and follows the parameters of the previously granted scheme at the site in terms of height. It is considered that the scheme design strikes a balance between respecting the surrounding environment of the scheme and ensuring the development potential of a strategically positioned and underutilised plot is maximised, in proximity to good planned public transport accessibility and employment locations and is an appropriate location for increased height in line with the *Building Height Guidelines*.

A *Landscape and Visual Impact Assessment* and *Daylight/Sunlight Analysis* have been carried out in conjunction with the design of the subject development. These assessments demonstrate that the proposed development will not have an undue negative impact on its receiving environment.

It is our professional planning opinion that the site has the capacity and capability to accommodate increased height that is actively sought in National policy guidance, given the site's corner frontage onto a road and roundabout and having regard to the fact that a 6 No. storey development was previously granted.

Chapter 3 of the *Building Height Guidelines* expressly seeks increased building heights in urban locations:

*"In relation to the assessment of individual planning applications and appeals, 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**"* **[Our Emphasis]**

Under the heading 'Development Management Principles' the *Building Height Guidelines* state (at paragraph 3.1) that it is Government policy that building heights must generally be increased, and that **Planning Authorities must apply certain broad principles when considering development proposals for buildings taller than prevailing building heights** in pursuit of the *Building Height Guidelines*.

There is no doubt, therefore, that the Specific Planning Policy Requirements in the *Building Height Guidelines* are relevant to the assessment of this proposed development.

Section 3.1 of the *Building Height Guidelines* states that:

"Planning Authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines:

Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres?

The proposed scheme involves the development of a highly underutilised, infill site in a prominent, sustainable, and built-up location.

Low-to-medium-density residential developments have been permitted further away than the subject site from Swords Town Centre, public transport, services and facilities, such as the Waterside development to the south-east of the site. Contrastingly, the subject development will unequivocally contribute towards delivering compact growth through the provision of a high-density residential development (141 dph) on sequentially appropriate lands that is in proximity to Swords Town Centre, existing and future high-quality public transport, services and facilities.

The scheme is therefore fully in accordance with the preferred approach of the *NPF*, which seeks compact growth.

Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these Guidelines?

The site accords with both the *Fingal Development Plan 2023-2029* and the *Building Height Guidelines*, where building height is considered having regard to the site's context. It is considered that the proposed height of part 4 No. to part 5 No. storeys is appropriate at the subject site as it has frontage along a Regional Road (R106) and roundabout, is in close proximity to existing and planned public transport, services, and facilities, and is sufficiently distanced to nearby residential dwellings.

Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework?

The *Fingal Development Plan 2023-2029* allows a locational based assessment of height to be carried out in relation to building height.

We note, in particular, that the *Development Plan* refers to National Policy Objective 35 of the *NPF*, which seeks an increase in residential density in settlements, through a range of measures including infill development schemes, area or site-based regeneration and increased building heights.

It is our opinion that the subject site has the potential to provide a height of up to 5 No. storeys as the scheme will sustainably densify this strategic site having regard to the high-

quality architectural composition of the scheme, the large public and communal open spaces provided and the site’s location at a prominent junction, which will all contribute towards absorbing the proposed building heights.

We note that a *Landscape and Visual Impact Assessment* and *BRE Daylight & Sunlight Assessment* have been carried out in conjunction with the design of the subject development and demonstrate that the proposed development will not have an undue negative impact on its receiving environment.

Specific Planning Policy Requirement 3

SPPR₃ of the *Building Height Guidelines* sets out that:

"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 [below]; 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.** [Our Emphasis]*

We now wish to consider how the proposed development complies with the specified criteria under Section 3.2 of the *Building Height Guidelines*, which are referred to in SPPR₃ as follows:

Development Management Criteria	
At the Scale of the Relevant City/ Town	
Assessment Criteria	Comment
<ul style="list-style-type: none"> <i>The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.</i> 	<ul style="list-style-type: none"> The subject site is considered eminently suitable for development given the site’s location in proximity to existing and future high-quality public transport options. The proposed Swords Central Station will be located c. 800-metres / 10-minutes walking distance to the south-west of the site along the R132 and will provide a new high-speed, high-capacity, high-frequency MetroLink from the city centre to Dublin Airport and Swords. There are 9 No. bus routes that operate in proximity to the subject site: Nos. 41, 42d, 43, 102, 142, 197, 503, 506 & 507. The closest bus stops to the subject site are 1050 and 1039 which are located only a few metres away along the R106 and serve the bus routes 102, 506 and 507.

	<ul style="list-style-type: none"> • As detailed in the <i>Mobility Management Plan</i>, there are a variety of planned cycle infrastructure upgrades for the surrounding area of the proposed development. A planned feeder route along the road adjacent to the development site and a primary orbital route along the R106, will further increase the connectivity of the development site by connecting this area to the wider cycle network plan. • In addition to the proposed cycle network plan, the site has specific provisions to introduce a cycle lane connecting the site into Swords Business Park to the north. • In addition to the above, it is noted that 404 No. cycle parking spaces are proposed, including 274 No. long-term (resident) spaces and 130 No. short-term (visitor) spaces. The residents bicycle parking is proposed in 6 No. bike stores, with 4 No. stores at ground floor level of the building and 2 No. stores are in the southern extent of the courtyard. The bike stores are equipped for a mix of bicycle parking types including standard, larger/heavier cargo, e-bike charging spaces as well as stacked lockers that can store foldable bicycles and additional ancillary equipment such as scooters and helmets. A bicycle maintenance hub will also be provided in one of the bike stores. • A <i>Mobility Management Plan</i> and <i>Traffic and Transportation Assessment</i> prepared by OCSC Consulting Engineers provides further detail in relation to the existing and proposed public transport facilities serving the subject site.
<ul style="list-style-type: none"> • <i>Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall</i> 	<ul style="list-style-type: none"> • The prevailing heights in the vicinity of the site generally range between 2-4 No. storeys. These buildings were constructed many years ago, at a time where compact growth and high-density development was less fundamental to delivering housing units compared to current times.

undertake landscape and visual assessment (LVIA), by a suitably qualified practitioner such as a chartered landscape architect.

- It is our professional opinion that the proposed scheme will successfully assimilate into the surrounding context, by sustainably densifying the subject site through the provision of high-density housing on underutilised lands, contributing positively towards addressing the national housing crisis.

- A Daylight and Sunlight Analysis has been carried out by J.V. Tierney & Co, which concludes:

"The site is mostly surrounded by Commercial Properties which do not have the same requirement for daylight / sunlight as Residential Properties do.

The Residential Properties are situated a far distance away from the Proposed Development and will not be impacted by the Proposed Development.

The performance of the Proposed Development itself, performs exceptionally well, with very high levels of daylight and sunlight being achieved for the residents."

- A Landscape Visual Impact Assessment has been carried out by Áit Urbanism + Landscape, which assesses the visual impact of the proposed development on the landscape character and 9 No. viewpoints surrounding the subject site. It was concluded that development is determined to be neutral in all viewpoints when assessed over a long-term period and the overall landscape sensitivity of the site is low, with a medium landscape value and high capacity for change.

- Evidently, the proposed development does not have any material impact on its surroundings in terms of daylight/sunlight, nor does it have any negative visual impact on the landscape character and viewpoints in proximity to the subject site.

- Furthermore, due to the generous separation distance between the proposed apartment building and

	<p> dwellings to the west (Seamount View) and south (St. Werburghs), it is considered that there will be no overlooking and overbearing concerns, ensuring the privacy and amenity of neighbours in protected.</p>
<ul style="list-style-type: none"> • <i>On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.</i> 	<ul style="list-style-type: none"> • The subject scheme seeks to limit urban sprawl by making best use of a highly underutilised, corner infill site. The scheme will create visual interest in the streetscape through various setbacks and modulation along the buildings elevations, in combination with the range of materials and colour palette. • The scheme will positively contribute to placemaking through the provision of numerous pedestrian and cyclist routes through and around the site. Of note, a link is proposed to connect the subject site to the existing public park to the west. • Additionally, the provision of 1,142 sq m of public open space will attract people to the site and can be utilised by the wider community, including the employees of Swords Business Park to the north. These open spaces will enhance the quality of living for future occupants and the wider public and thus will positively contribute to place-making. • The scheme will result in a high-quality architectural design, which has been informed by the surrounding existing context, appropriately densifying an infill site, providing varied and visually interesting façades for the surrounding streetscape, which will positively contribute to place-making.

Development Management Criteria	
At the scale of District/ Neighbourhood / Street	
Assessment Criteria	Comment
<ul style="list-style-type: none"> • <i>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.</i> 	<ul style="list-style-type: none"> • The scheme seeks to address all sides of the site in terms of building frontage. The proposed building will overlook the public open space and car parking to

	<p>the north, the pedestrian and cyclist linkage to the west, the R106 and communal open space to the south, and the access road for the site and Applegreen Service Station to the east. The communal open space in the central courtyard is overlooked by majority of apartments. This allows 'eyes-on-the-street' on all sides of the proposed building to ensure the safety of residents and the wider community.</p> <ul style="list-style-type: none"> • In terms of the built environment, there are no Protected Structures, Recorded Monuments or Places, or Architectural Conservation Areas at or near the subject site. • The development will make a positive contribution to the neighbourhood and streetscape by: delivering various open spaces and permeable links; activation of the four sides of the site; enhancing the natural vegetation at the site by introducing a broad planting regimen; augmenting the critical mass required to sustain local service provision and businesses; and broadening the number and type of housing options available in the area, ultimately providing some 123 No. new homes. • The design of the public and communal open space includes play areas, seating, lawns, planting and pedestrian paths, which will positively contribute to the natural environment.
<ul style="list-style-type: none"> • <i>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.</i> 	<ul style="list-style-type: none"> • The <i>Architectural Design Statement</i> prepared by Coady Architects details the use of materials, the elevational treatment and height arrangement which break up the massing of the proposed development. • Compared to the previously permitted scheme on site which extended the building across nearly the entirety of the eastern boundary of the site, giving little break in the streetscape, the proposed courtyard style block of this development ensures there are no long

	<p>uninterrupted facades and provides relief along the streetscape with the proposed public open space in the north of the site.</p> <ul style="list-style-type: none"> • It is clear that a significant effort has been made to provide a well-considered and interesting building form and site layout which enhances legibility, wayfinding and connectivity within the site for future residents and the existing wider area.
<ul style="list-style-type: none"> • <i>The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009)".</i> 	<ul style="list-style-type: none"> • The scheme includes c. 13% of the site as high-quality public open space, which will enhance the urban design context for the area. In addition, some c. 932 sq m of external communal open space will be provided for the residents of the apartments. • The scheme will provide active surveillance of the public and communal open spaces throughout the development. The new public spaces and linkages will significantly improve the public realm and will also enhance legibility and permeability in the area and thus represents a key planning gain for the wider neighbourhood. Importantly, with the exception of the communal open spaces, the development will not be gated and will be open to the public. • The Site-Specific Flood Risk Assessment prepared by OCSC Consulting Engineers and enclosed with the <i>Engineering Services Report</i> concludes that: <p><i>"The proposed development site has been assessed in accordance with the "The Planning System and Flood Risk Management" Guidelines. As part of the sequential test, the OPW flood hazard maps have been consulted, as have the Catchment Flood Risk Assessment Maps produced by the OPW, and the Strategic Flood Risk Assessment mapping in the Fingal Development Plan.</i></p>

	<p><i>In all cases it was found that the development is located outside the extent of Flood Zones A and B, at low risk of flooding, and the 'Vulnerable Development' is deemed appropriate within the proposed site location. Therefore, a Stage 2 – Initial Flood Risk Assessment is deemed not required, as per the PFRM Guidelines." [Our Emphasis]</i></p>
<ul style="list-style-type: none"> <i>The proposal makes a positive contribution to the improvements of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.</i> 	<ul style="list-style-type: none"> The high-quality design of the scheme will ensure the development will be a legible and attractive addition to the area, particularly due to the attractive links provided throughout the site. The existing underutilised site will be replaced with a high-quality development, which will be a positive insertion to the area, providing active frontages on four sides of the site.
<ul style="list-style-type: none"> <i>The proposal positively contributes to the mix of uses and/ or building / dwelling typologies available in the neighbourhood.</i> 	<ul style="list-style-type: none"> The area surrounding the subject site comprises mixed-uses, including residential, commercial and industrial. The proposed development will contribute positively to the mix of uses in the area by introducing smaller unit sizes (1-and-2-bed units) and large quantum of public open space. There is a significant quantum of employment lands in the immediate vicinity. The introduction on 123 No. homes in this location can provide workers for these surrounding employment uses as well as homes close to public transport and an abundance of services and facilities.

Development Management Criteria	
At the Scale of the Site/ Building	
Assessment Criteria	Comment
<ul style="list-style-type: none"> <i>The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.</i> 	<ul style="list-style-type: none"> The height of the scheme is part 4 No. to part 5 No. storeys and thus is not challenging from a daylight and sunlight perspective. The proposed development has been carefully designed and modulated to ensure there is minimal impact on the

	<p>daylight and sunlight reaching neighbouring sites and thus the scheme will have a limited impact on the amenity of surrounding properties. This is detailed in the <i>BRE Daylight & Sunlight Assessment</i> which concludes:</p> <p><i>"The site is mostly surrounded by Commercial Properties which do not have the same requirements for daylight/sunlight as Residential Properties do.</i></p> <p><i>The Residential Properties are situated a far distance away from the Proposed Development and will not be impact by the Proposed Development.</i></p> <p><i>The performance of the Proposed Development itself, performs exceptionally well, with very high levels of daylight and sunlight being achieved for the residents."</i></p>
<ul style="list-style-type: none"> • <i>Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guidelines. Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and an effective urban design and streetscape solution.</i> 	<ul style="list-style-type: none"> • As noted above, the <i>BRE Daylight & Sunlight Assessment</i> and the <i>Landscape and Visual Impact Assessment</i> ultimately demonstrate that no material impacts will occur on neighbouring properties. • The <i>BRE Daylight & Sunlight Assessment</i> includes a detailed assessment and review of the proposed development and the possible impacts of the proposed development on existing and potential neighbouring developments. The Planning Authority is directed to review this Report, included as part of this application pack. • The scheme will also contribute towards achieving wider planning objectives such as increased building heights and density and the development of infill lands in a sustainable location and will represent high-quality urban redevelopment for the area especially due to the new permeable links provided, the open

	spaces, and the activation of the streetscape.
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Development Management Criteria	
Site Specific Assessments	
Assessment Criteria	Comment
<ul style="list-style-type: none"> <i>Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measurements to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.</i> 	<ul style="list-style-type: none"> The scheme proposes a part 4 No. to part 5 No. storey apartment block and thus a Wind Assessment is not required. Generally, these assessments are required when buildings are at least 30 No. metres in height. The maximum height of the development is c. 19.27 metres, which is well below 30 No. metres.
<ul style="list-style-type: none"> <i>In development locations in proximity to sensitive bird and/ or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and/ or collision.</i> 	<ul style="list-style-type: none"> The potential for collision risk is low considering the building location, design and materials used. This is detailed further in the <i>Ecological Impact Assessment</i> enclosed herewith, which states: <i>"based on the physical appearance of the proposed structures and the nature of their location, it is deemed that birds including any 'at-risk' species, do not have the potential to be impact by the Proposed Development in terms of collisions and the risk is therefore deemed to be imperceptible in the absence of any mitigation."</i>
<ul style="list-style-type: none"> <i>An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.</i> 	<ul style="list-style-type: none"> The <i>Telecommunications Impact Assessment Report</i> enclosed and prepared by Independent Site Management notes the following: <i>"Pursuant to our review, ISM can conclude based on the findings outlined herein that the proposal being made by the Applicant within its submission to the Planning Authority does not impact any existing Telecommunications Channels at the time of the assessment and therefore have not made any recommendations that the Applicant implement any mitigating infrastructure at this time."</i>

<ul style="list-style-type: none"> • <i>An assessment that the proposal maintains safe air navigation.</i> 	<ul style="list-style-type: none"> • The subject site is located outside the solar safeguarding zone for Dublin Airport and the proposed development is not of sufficient height to require a detailed Aviation Impact Assessment.
<ul style="list-style-type: none"> • <i>An urban design statement including, as appropriate, impact on the historic built environment.</i> 	<ul style="list-style-type: none"> • An <i>Architectural Design Statement</i> prepared by Coady Architects has been submitted with this planning application. • There is no historic sensitive built environment in the vicinity of the subject site.
<ul style="list-style-type: none"> • <i>Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.</i> 	<ul style="list-style-type: none"> • An <i>Appropriate Assessment Screening Report, Ecological Impact Assessment and Environmental Impact Assessment Report</i> have been prepared and submitted with this planning application.

Conclusion on compliance with criteria under Section 3.2 of the *Building Height Guidelines*:

Having regard to the response to each element of the Development Management Criteria outlined above, it is our considered opinion that the proposed development meets the criteria under Section 3.2 of the *Building Height Guidelines*. The development can be appropriately assimilated within the surrounding context having regard to the location of the subject site within an existing built-up area, proximate to existing and planned high-quality public transport options and to services and facilities in Swords Town Centre. The surrounding area is predominantly 2-4 No. storeys in height; however, it is considered that the mere increase in height to a maximum of 5 No. storeys at the subject site will not impact the landscape character and visual amenity of the area, as demonstrated in the accompanying *BRE Daylight & Sunlight Assessment* and the *Landscape and Visual Impact Assessment*.

We note that the first application made on site permitted a 5 No. storey scheme with a maximum height of 18.9 metres and the amendment application permitted a 6 No. storey scheme with a maximum height of 19.9 metres. The proposed part 4 No. to part 5 No. storey development has a maximum height of 19.27 metres, which is marginally above the first permitted scheme and below the amendment scheme, both of which were considered appropriate by Fingal County Council and An Bord Pleanála in terms of building height.

5.6 *Sustainable Urban Housing: Design Standards for New Apartments – Guidelines for Planning Authorities, 2023*

The Department of Housing, Planning and Local Government published the updated *Sustainable Urban Housing: Design Standards for New Apartments* in July 2023 (*Apartment Guidelines*). The *Apartment Guidelines* recognise the need for alternative types of

accommodation to facilitate the societal and economic changes which would be better suited to reflect current and evolving household formation and housing demand. The proposed development comprises a mix of apartment sizes, including 1-bed, 2-bed (3-person), and 2-bed (4-person) units. The proposed unit type and sizes will accommodate people looking to start off on the property ladder, small families, or older couples looking to downsize. In addition, it is highlighted that the development provides 24 No. social housing units.

The *Apartment Guidelines* sets out Specific Planning Policy Requirements ('SPPR') and general requirements for apartment developments. Each SPPR and general requirement are set out below with a response provided for each in respect of compliance of the proposed development:

SPPR 1:

"Apartment 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)."

The proposed development comprises 55 No. 1-bed units, 6 No. 2-bed (3-person) units and 62 No. 2-bed (4-person) units. This provides a breakdown of 44.7% 1-bed units and 55.3% 2-bed units and therefore is fully in accordance with SPPR 1.

SPPR 2:

"For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha:

- *Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio-type units;*
- *Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th;*
- *For schemes of 50 or more units, SPPR 1 shall apply to the entire development."*

N/A – the subject site measures c. 0.8731 Ha (net developable area).

SPPR 3:

"Minimum Apartment Floor Areas:

- *Studio apartment (1 person) 37 sq m*
- *1-bedroom apartment (2 persons) 45 sq m*
- *2-bedroom apartment (4 persons) 73 sq m*
- *3-bedroom apartment (5 persons) 90 sq m"*

The proposed apartments meet, and in many cases, significantly exceed the minimum apartment floor areas, with 58% of the units exceeding the minimum floor areas by 10% (71 No.).

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% of 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 site 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."*

Although it has been determined that the subject site is a central and/or accessible urban location, the proposed development has included 62% dual aspect units (76 No.), which exceeds the minimum requirement of 33% for central and/or accessible urban locations. This high provision of dual aspect units demonstrates the high-quality of the scheme.

SPPR 5:

"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."

The ground floor of the proposed scheme meets the requirement for 2.7 m floor to ceiling heights. The proposal is fully in compliance with SPPR 5.

SPPR 6:

"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."

The proposed development complies with building regulations by providing 12 No. apartments per floor per core (or less) in accordance with SPPR 6.

Minimum Aggregate Area of Living/Dining/Kitchen Area and Minimum Widths for Main Living/Dining Rooms

The *Apartment Guidelines* outline a requirement for minimum aggregate area of living/dining/kitchen space as follows:

Unit Type	Minimum Living/Kitchen/Dining Area Required	Width of Living/Dining Room Required
Studio	30 sq m	4 metres
One Bedroom	23 sq m	3.3 metres
Two Bedroom (3 No. person)	28 sq m	3.6 metres
Two Bedroom (4 No. person)	30 sq m	3.6 metres
Three Bedroom	34 sq m	3.8 metres

The proposed units have been designed in accordance with the standards for the minimum aggregate area of the living/dining/kitchen space and widths of the living/dining rooms, as detailed in the *Housing Quality Assessment* and floor plans enclosed and prepared by Coady Architects.

Minimum Bedroom Floor Areas/Widths

The *Apartment Guidelines* outline the requirement for minimum bedroom floor areas and widths as follows:

Unit Type	Minimum Floor Area	Minimum Width
Studio	30 sq m	4 metres
Single Bedroom	7.1 sq m	2.1 metres
Double Bedroom	11.4 sq m	2.8 metres
Twin Bedroom	13 sq m	2.8 metres

The proposed units have been designed in accordance with the standards for the minimum bedroom floor areas and widths, as detailed in the *Housing Quality Assessment* and floor plans enclosed and prepared by Coady Architects.

Minimum Storage Space Requirements

The *Apartment Guidelines* outline the requirement for minimum storage space as follows:

Unit Type	Minimum Storage Space
Studio	3 sq m
One Bedroom	3 sq m
Two Bedroom (3 No. person)	5 sq m
Two Bedroom (4 No. person)	6 sq m
Three Bedrooms or more	9 sq m

As detailed in the *Housing Quality Assessment* and floor plans enclosed, each of the units have been designed in accordance with the standards for the minimum storage space outlined in the *Apartment Guidelines*.

Private Open Space

The *Apartment Guidelines* outline a requirement for private open space per unit as follows:

Unit Type	Private Open Space Required
Studio	4 sq m
One Bedroom	5 sq m
Two Bedroom (3 No. person)	6 sq m
Two Bedroom (4 No. person)	7 sq m
Three Bedroom	9 sq m

As detailed in the *Housing Quality Assessment* and floor plans enclosed, private open space has been provided for each of the proposed apartments in line with the requirements outlined in the *Apartment Guidelines*.

Communal Open Space

The *Apartment Guidelines* outline the following standards for communal open space:

Unit Type	Communal Open Space Required
Studio	4 sq m
One Bedroom	5 sq m
Two Bedroom (3 No. persons)	6 sq m
Two Bedroom (4 No. persons)	7 sq m
Three Bedroom	9 sq m

Based on the composition of the proposed 123 No. units, the subject scheme has a requirement of 745 sq m of communal open space to meet the minimum standards outlined in the *Apartment Guidelines*.

The development proposes to provide 1,011 sq m of communal amenity space, including 79 sq m of internal space and 932 sq m of external space, which exceeds the minimum requirement. This ensures that high quality communal open space is provided for future tenants.

Play Provision

Section 4.13 of the *Apartment Guidelines* state that the recreational needs of children must be considered as part of the communal amenity space within apartment schemes and that play provision must be safe and protected throughout the site. As such, the *Apartment Guidelines* require children play space to be catered for:

- "within small play spaces (**about 85-100 q. metres**) 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 area (200-400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms."*
[Our Emphasis]

The subject development seeks to provide 123 No. units with a proposed mix of 55 No. 1-bed units and 68 No. two-bed units. As units with two or more bedrooms are only to be included in the calculation for play provision (i.e. studios and 1-bed units are discounted), the required quantum of play provision is 85-100 sq m based on the proposed 68 No. 2-bed units.

The quantum of play space proposed is 193 sq m and will be located in the courtyard of the communal amenity space. This space will facilitate informal nature-based play for young children and will be safe for children to use with sufficient overlooking provided. As such, the proposed quantum of play provision exceeds the required quantum set out in the *Apartment Guidelines*.

Additionally, the proposed public open space to the north of the site will provide 137 sq m of natural play space, bringing the total play space for the entire development to 330 sq m, which is considered sufficient to cater for children of the future units and surrounding local area.

Car Parking

The *Apartment Guidelines* states that the level of car parking to be provided for a residential development is based on the location of a site in proximity to high-quality public transport. Out of the 3 No. terms used to define the accessibility of a site, the subject site is considered to fall within 'Central and/or Accessible Urban Locations' as defined below, where the level of car parking is to be minimised in developments:

"In larger scale and higher density developments, comprising wholly of apartments in more central locations that are well served by public transport, the default policy is for car parking provision to be minimised, substantially reduced or wholly eliminated in certain circumstances. The policies above would be particularly applicable in highly accessible areas such as in or adjoining city cores or at a confluence of public transport systems such as rail and bus stations in close proximity.

These locations are most likely to be cities, especially in or adjacent to (i.e. within 15 minutes walking distance of) city centres or centrally located employment locations. This includes 10 minutes walking distance of DART, commuter rail or Luas stops or within 5 minutes walking distance of high frequency (min 10 minute peak hour frequency) bus services."

The proposed development provides 24 No. car parking spaces which is considered acceptable given the subject sites proximate location to the planned Metro Swords Central Station, the existing and future bus services nearby the subject site, and employment opportunities in Swords Town Centre and Swords Business Park.

Cycle Parking

In regard to bicycle parking standards for residential developments, Section 4.17 of the *Apartment Guidelines* sets a minimum requirement of 1 No. cycle space per bedroom and 1 No. space per 2 No. unit for visitor cycle parking. Thus, the required number of cycle spaces for the proposed development would be 191 No. long-term spaces and 62 No. short-term spaces.

The proposed development seeks to provide a generous 274 No. long-term cycle spaces and 130 No. short-term cycle spaces. Therefore, the proposed quantum of cycle parking spaces exceeds the minimum requirement set out in the *Apartment Guidelines*.

As outlined above, it is clear that the proposed development complies fully with the SPPR's, and further requirements set out in the *Sustainable Urban Housing: Design Standards for New Apartments* (2023).

5.7 *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities* (2007)

The *Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes and Sustainable Communities* (2007) outline a number of key principles which are of relevance to the subject scheme:

"The purpose of these Guidelines is to assist in achieving the objectives of Delivering Homes; Sustaining Communities contained in the Government Statement on Housing Policy which focuses on creating sustainable communities that are socially inclusive by:

- *Promoting high standards in the design and construction and in the provision of residential amenity and services in new housing schemes;*
- *Encouraging best use of building land and optimal utilisation of services and infrastructure in the provision of new housing;*
- *Pointing the way to cost effective options for housing design that go beyond minimum codes and standards; promoting higher standards of environmental performance and durability in housing construction;*
- *Seeking to ensure that residents of new housing schemes enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and providing homes and communities that may be easily managed and maintained."*

The subject scheme provides a high-quality designed scheme in accordance with required standards. The scheme makes optimal use of the lands and has taken the opportunity to explore the potential for increased heights at the site, similar to that of the previously permitted height.

The scheme will be provided with high quality materials that will contribute positively to the streetscape, as described throughout the accompanying *Architectural Design Statement*. The development is designed to ensure that the long-term durability and maintenance of

materials is an integral part of the design and specifications of the proposed development. The scheme will provide attractive and high-quality apartments and open spaces, which ensures that first-rate living conditions will be developed. In addition, the design of the subject scheme has evolved through a creative process, in conjunction with the results of the *BRE Daylight & Sunlight Assessment* to ensure an attractive living environment for future residents. The safety and security guidance outlined in the 2007 Guidelines have also been taken into consideration in the design of the scheme.

5.8 ***Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024)***

The recently adopted *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (January 2024)* ('*Compact Settlement Guidelines*') replaces the *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)* ('*Sustainable Residential Development Guidelines 2009*').

5.8.1 **Separation Distances**

The *Compact Settlement Guidelines* considers the standard 22 No. metres separation distance between opposing upper floor rear windows does not account for modern methods of design and construction and the capability of assessing the appropriate level of daylight and sunlight being received by neighbouring dwellings and the level of privacy obtained. In this regard, the *Compact Settlement Guidelines* state:

*"Through the careful massing and position of blocks, positioning of windows and the integration of open space at multiple level it is possible to achieve a high standard of residential amenity and good placemaking with **separation distances of less than 22 metres**. Separation distances should, therefore, be determined based on considerations of privacy and amenity, informed by the layout, design and site characteristics of the specific proposed development."* **[Our Emphasis]**

Furthermore, SPPR 1 of the *Compact Settlement Guidelines* states the following in regard to minimum separation distances for residential development:

*"It is a specific planning policy requirement of these Guidelines that statutory development plans 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.” [Our Emphasis]

The separation distance between the western elevation of the proposed apartment block and the eastern elevation of the closest dwelling in Seamount View (No. 30) is a generous c. 49.7 No. metres. Furthermore, the separation distance between the southern elevation of the proposed apartment block and the northern elevation of St. Werburghs apartment building is c. 52.86 No. metres. This is illustrated in Figure 5.2.

As illustrated in Figure 5.2, the separation distance between the closest opposing windows of the western and eastern apartments is c. 23.42 No. metres whilst the distance between northern and southern apartments is c. 45 No. metres, ensuring the privacy and amenity of future residents is protected.

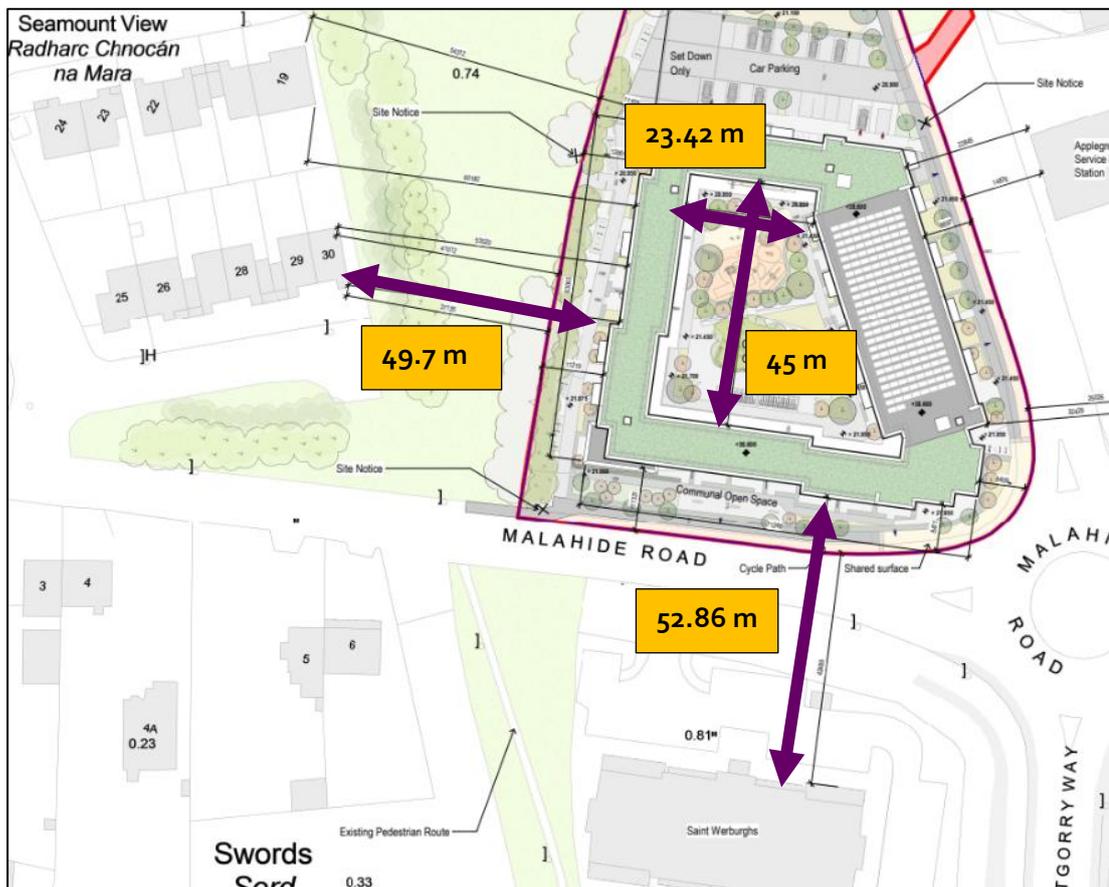


Figure 5.2: Proposed Separation Distances Between the Proposed Development and Neighbouring Dwellings and Within the Development Itself

(Source: Drawing No. '0503' by Coady Architects, Annotated by Thornton O'Connor Town Planning, 2024)

It has been evidenced that the proposed development fully accords with SPPR 1 of the *Compact Settlement Guidelines* for a minimum separation distance of 16 No. metres between

opposing windows of the rear and side elevations of the proposed units and neighbouring dwellings and between units within the development.

5.8.2 Density

Based on the 123 No. proposed units and the site's net area of 0.8731 Ha, the density is calculated at 141 dph.

Policy and Objective 3.1 of the *Compact Settlement Guidelines* states the following:

"It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate."

At this juncture, we note that the *Compact Settlement Guidelines* only provide guidance on density as they are not a SPPR.

Establishing the density range for sites is based on its settlement size and area type set out in Tables 3.1 – 3.7 of the *Compact Guidelines*. As identified in Figure 5.1 and Appendix E of the *Regional Spatial & Economic Strategy* by the Eastern & Midland Regional Assembly (subject site falls within the Electoral Division of Swords– Seatown), the subject site is located in the Dublin Metropolitan Area and therefore Table 3.3 of the *Compact Settlement Guidelines* for 'Metropolitan Towns and Villages' applies. There are 3 No. areas and density ranges for 'Metropolitan Towns and Villages':

Metropolitan Towns (>1,500 population) – Centre and Urban Neighbourhoods

The centre and urban neighbourhoods category includes: (i) the town centre and immediately surrounding neighbourhoods, (ii) strategic and sustainable development locations, and (iii) lands around existing or planned high capacity public transport nodes or interchanges (defined in Table 3.8). It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 150 dph (net) shall generally be applied in the centres and in urban neighbourhoods of Metropolitan Towns.

Metropolitan Towns (>1,500 population) – Suburban / Urban Extension

Suburban areas are the low density car-orientated residential areas constructed at the edge of the town, while urban extension refers to greenfield lands at the edge of the existing built-up footprint that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 35 dph to 50 dph (net) shall generally be applied at suburban and edge locations of Metropolitan Towns, and that densities of up to 100 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8).

Metropolitan Area – Village (<1,500 population)

Metropolitan Villages are small in scale with limited infrastructure and services provision. These settlements are identified for incremental growth that takes account of the capacity of existing services and infrastructure (including public transport and water services infrastructure). Density should be tailored to reflect existing density and / or built form but should not generally not fall below 25 dph.

The subject site is considered to fall within the categorisation of 'Metropolitan Towns (> 1,500 population) – Centre and Urban Neighbourhoods' as the subject site is located within the existing built-up area only c. 650 metres from Swords 'Major Town Centre' zoning⁷. Furthermore, the subject site is located c. 800 metres / 10-minute walking distance from the proposed Swords Central Station to the south-west of the site along the R132 which will facilitate the future high-capacity and frequent MetroLink. For such locations, the *Compact Settlement Guidelines* state that densities in the range of 50–150 dph shall be applied. As such, the density of the proposed Large-Scale Residential Development at 141 dph accords with the range set out for 'Metropolitan Towns (> 1,500 population) – Centre and Urban Neighbourhoods' in the *Compact Settlement Guidelines*.

The *Compact Guidelines* provide further guidance relating to 'Refining Density' to take account of specific characteristics and constraints of individual sites. This additional requirement is intended to incorporate the nuances of individual sites, pushing their densities up and down within the ranges set by the *Compact Settlement Guidelines*. 'Refining Density' is principally (but not solely) comprised of 2 No. steps, which require consideration of: (1) accessibility; and (2) character, amenity and natural environment.

Step 1: Accessibility

Table 3.8 of the *Compact Settlement Guidelines* sets out the definitions for terms used to define accessibility:

⁷ Closest point between the subject site and land zoned as 'Major Town Centre' using Map Sheet No. 8 of the *Fingal Development Plan 2023-2029* and distance tool on Google Maps.

High Capacity Public Transport Node or Interchange

- 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.

Accessible Location

- 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.

Intermediate Location

- Lands within 500-1,000 metres (i.e. 10-12 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services; and
- Lands within 500 metres (i.e. 6 minute walk) of a reasonably frequent (minimum 15 minute peak hour frequency) urban bus service.

Peripheral

- Lands that do not meet the proximity or accessibility criteria detailed above. This includes all lands in Small and Medium Sized Towns and in Rural Towns and Villages.

11 10-15 minute peak hour frequency.

12 Core Bus Corridor refers to the 'BusConnects Core Bus Corridor Schemes' planned for cities that will provide enhanced walking, cycling and bus infrastructure on key access corridors.

Appendix A of the *Compact Guidelines* defines a 'Transport Node or Interchange' as the following:

Transport Node or Interchange:

Places of convergence and interchange between different forms of transportation.

As the future Swords Central Station will provide a MetroLink service, and since there is an existing bus stop outside the proposed MetroLink station (bus stop No. 5074 & 5079⁸) that currently provides frequent bus services, it is considered that the Swords Central Station could be defined as a 'Transport Node or Interchange'. As highlighted throughout this Planning Report, the subject site is located only c. 800-metres / 10-minute walk from the

⁸ During peak hours (07:00-09:00 & 16:00-18:00 Monday to Friday), bus stop Nos. 5074 & 5079 provide frequent bus services every 10-minutes. These bus stops facilitate the bus route Nos. 41, 41b, 41d, 101 & 197 operated by BusEireann, Dublin Bus and Go Ahead Ireland. (www.transportforireland.ie – 'Live Departures' map)

future Swords Central Station and thus falls within the definition of a 'High Capacity Public Transport Node or Interchange' as set out in Table 3.8 of the *Compact Settlement Guidelines*.

Additionally, we note that under BusConnects, there are Local, Other City Bound and Peak Time Routes proposed in proximity of the subject site along the R106 and R132, further enhancing the accessibility of the subject site.

Step 2: Impact of Development to the Character, Amenity and Natural Environment

Consideration is given to the impact of the proposed development on the character, amenity and natural environment of the area surrounding the subject site. Section 3.4.2 of the *Compact Settlement Guidelines* state that:

"While considerations of centrality and accessibility will have a significant bearing on density, it is also necessary to ensure that the quantum and scale of development at all locations can integrate successfully into the receiving environment. New development should respond to the receiving environment in a positive way and should not result in a significant negative impact on character (including historic character), amenity or the natural environment."

1) Character

As discussed throughout this Planning Report, although the character of the area to the west, south and south-east of the site principally comprises low-to-medium-density houses, apartments and duplexes of 2-4 No. storeys in height, it is considered that there is scope to provide higher density developments given the infill nature of the site in an existing built-up area, and its proximity to public transport options, services, facilities and employment opportunities.

The FCC Planning Officer in their assessment of the first planning application made at the subject site considered that the scale and height of the development would have "*limited potential for impact on existing development in the area*". Additionally, the ABP Planning Inspector in their assessment of the amendment application considered that the proposal would not "*represent an abrupt transition in scale which would render it visually incongruous with the existing character of development in the area*" and that it "*would not seriously injure the amenities of the area*". It is noted that the previous permitted buildings extended across nearly the entirety of the eastern boundary of the site, whereas the proposed development seeks to concentrate the built form in the southern portion of the site, with car parking, landscaping and public open space encapsulating the remainder of the site to provide visual relief in the streetscape.

A *Landscape & Visual Impact Assessment* was prepared by Áit Urbanism + Landscape, which assessed the visual impact of the development on the surrounding area when viewed from various important locations nearby the subject site. It was concluded that:

"The overall sensitivity of the site is low, with a medium landscape value and high capacity for change. The 'Quality of Impact' of the proposed development is determined to be neutral in six of the nine representative viewpoints; and neutral to positive in three of the viewpoints. The 'Significance of Impact' ranges between 'Not Significant' to 'Moderate' through viewpoints one to nine. It is therefore determined that the proposed development will not have a significant impact on the existing landscape or visual amenity of the subject site."

Any future development at the subject site would inevitably result in some degree of change in the visual environment; however, as noted above, the proposed development would result in a change whereby the impact is determined to be neutral and positive in the long-term.

It is also noted that there are no Protected Structures, Recorded Monuments or structures / buildings of historic importance located in proximity to the subject site and as such, the proposed development will not negatively impact the character of the historic environment.

Therefore, it is considered that the proposed development at the subject site would not negatively alter the existing and emerging character of the local area, including the historic environment.

2) Amenity

A *BRE Daylight & Sunlight Assessment* has been prepared by J.V. Tierney & Co and is submitted herewith. The report assesses whether there would be any effect from the proposed development on the level of daylight and sunlight received by neighbouring properties/environment.

The residential dwellings in Seamount View to the west of the site and St. Werburghs to the south were included in the assessment, as well as the commercial properties of Applegreen Service Station to the east and Bidvest Noonan to the north. The *BRE Daylight & Sunlight Assessment* concluded the following:

"The site is mostly surrounded by Commercial Properties which do not have the same requirements for daylight/sunlight as Residential Properties do.

The Residential Properties are situated a far distance away from the Proposed Development and will not be impact by the Proposed Development."

As noted above, the amenity of neighbouring residential and commercial properties will remain unaffected from a daylight and sunlight perspective.

Furthermore, the layout of the scheme is such that the proposed apartment block is located at an adequate distance from neighbouring properties. As discussed previously in Section 4.7 above, the proposed development fully accords with SPPR 1 of the *Compact Settlement Guidelines* for a minimum separation distance of 16 No. metres between opposing windows of the rear and side elevations of the proposed units and neighbouring dwellings and between units within the development, thus ensuring the protection of existing residents' privacy and amenity.

Therefore, it is considered that the proposed development at the subject site would not negatively impact the amenity and privacy of existing neighbouring properties.

3) Natural Environment

The following reports have been prepared by Enviroguide Consulting and are submitted herewith, with their conclusions provided below:

a) *Appropriate Assessment Screening Report*

"The Proposed Development at Mountgorry, Swords, Co. Dublin has been assessed taking into account:

- *The nature, size and location of the proposed works and possible impacts arising from the construction works .*
- *The QIs and conservation objectives of the European sites .*
- *The potential for in-combination effects arising from other plans and projects.*

In conclusion, upon the examination, analysis and evaluation of the relevant information and applying the precautionary principle, it is concluded by the authors of this report that the possibility may be excluded that the Proposed Development will have a significant effect on any of the European sites listed below:

- *Malahide Estuary SAC (000205).*
- *Malahide Estuary SPA (004025).*
- *North-West Irish Sea SPA (004236).*

In carrying out this AA screening, mitigation measures have not been taken into account. Standard best practice construction measures which could have the effect of mitigating any effects on any European Sites have similarly not been taken into account.

*On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on the above-listed European sites, whether arising from the project itself or in combination with other plans and projects, can be excluded in light of the above listed European sites' conservation objectives. Thus, **there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of an NIS is not required.**" [Our Emphasis]*

b) *Ecological Impact Assessment Report*

*"It is considered that, provided the mitigation measures proposed within this report together with all best practice development standards as outlined in the CEMP are carried out in full, **there will be no significant negative impact to any KER habitat, species group or biodiversity as a result of the Proposed Development.**"*

Additionally, the landscaping plan for the Proposed Development was designed to offset some of the habitat loss that will result from the Proposed Development and to further enhance the area and maintain ecological connectivity along the west boundary and the wider landscape.

Furthermore, the ecology parks proposed at the Site allows for additional habitat enhancements for small fauna such as reptiles and amphibians that may already be present at the Site to further offset the loss of habitats." [Our Emphasis]

c) EIA Screening Report

*“Based on the assessment carried out in the appropriate sections of this EIA Screening Report, it can be concluded that **the Proposed Development will not have significant effects on the environment during both the Construction and Operational Phases.***

Having regard to the nature and scale of the Proposed Development and the absence of any significant environmental sensitivities in the area, it is concluded that, by reason of the nature, scale and location of the site, the Proposed Development would not be likely to have significant effects on the environment and a mandatory Environmental Impact Assessment Report (EIAR) is not required.” [Our Emphasis]

d) Statement in accordance with Article 103(1A)a of the Planning and Development Regulations 2001, as amended.

“This Statement in accordance with Article 103(1A) a of the Planning and Development Regulations 2001, as amended, details how the available results of all relevant assessments of the effects on the environment from the Proposed Development have been carried out pursuant to relevant European Legislation.

*This Statement, in conjunction with the EIA Screening, has determined that, **by reason of the nature, scale and location of the Proposed Development Site, and the proposed mitigation measures outlined, the Proposed Development does not require a mandatory Environmental Impact Assessment Report (EIAR).**” [Our Emphasis]*

As is evident by the above conclusions of the accompanying environmental and ecological assessments, there will be no negative impact on the natural environment.

Concluding Remarks on Refining the Density Range for the Subject Site

Due to the site’s proximity to the future Swords Central Station with various bus stops nearby providing frequent services, and to Swords Town Centre where a range of services, facilities and amenities are available, it is evident that the subject site falls within the definition of ‘Centre and Urban Neighbourhoods’. Furthermore, the subject site will be able to absorb the proposed scale of development whilst not causing any negative impacts on the surrounding character, amenity, or natural environment, as demonstrated in the accompanying plans and assessments.

Having complete the two-step density refining process, it is considered that a residential density of 141 dph is appropriate for the subject site and is in accordance with Policy and Objective 3.1 of the *Compact Settlement Guidelines*.

5.8.3 Car Parking

SPPR 3 of the *Compact Settlement Guidelines* sets out car parking ratios for residential developments based on their level of accessibility:

“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."

Similar to the *Apartment Guidelines*, Section 5.3.4 of the *Compact Settlement Guidelines* promote a reduction in car parking provision in areas proximate to high-quality public transport options and key services and facilities:

"Car parking ratios should be reduced at all urban locations, and should be minimised, substantially reduced or wholly eliminated at locations that have good access to urban services and to public transport. In areas where car parking is reduced local authorities should be satisfied that the mobility needs of residents and works can be satisfied (e.g. through shared mobility solutions such as car and bike share)."

As already demonstrated above, as the subject site falls within the Dublin Metropolitan Area, Table 3.3 of the *Compact Settlement Guidelines* applies and as such, the car parking ratios identified in part (i) above do not apply. Therefore, the subject site can be considered as an 'Accessible' location, where SPPR 3 of the *Compact Guidelines* sets out **a maximum ratio of 1.5 No. spaces per dwelling.**

The maximum car parking provision for the proposed development would therefore be 185 No. spaces based on the proposed 123 No. residential units. However, as stated in Section 5.3.4 of the *Compact Guidelines*, car parking ratios "***should be minimised, substantially reduced or wholly eliminated at locations that have good access to urban services and to public transport***" [Our Emphasis]. As identified above, the subject site is highly accessible given its proximity to the planned Swords Central Station, various bus stops, services and facilities, and employment opportunities at Swords Town Centre and Swords Business Park.

Therefore, the highly accessible location of the subject site reduces the need for private car usage, and as such, the proposed development, which seeks to provide 24 No. car parking spaces, is considered to be in accordance with SPPR 3 of the *Compact Settlement Guidelines*.

5.8.4 Bicycle Parking

In regard to bicycle parking provision for residential development, SPPR 4 of the *Compact Settlement Guidelines* sets out the following in relation to bicycle parking provision:

"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." [Our Emphasis]*

The minimum bicycle parking provision for the proposed development would therefore be 191 No. spaces to cater for 55 No. 1-bed units and 68 No. 2-bed units. The proposed development seeks to provide 274 No. long-term bicycle parking spaces and 130 No. visitor spaces, which is well above the minimum requirements set out in SPPR 4 of the *Compact Settlement Guidelines*. Furthermore, there will be 108 No. additional storage lockers also provided which will give residents of the apartments the option to store their bicycle, bicycle equipment, and other larger items. Please refer to Section 4.8 above for further details on the proposed bicycle parking.

It is therefore considered that the quantity and design of the bicycle parking proposed as part of the subject development wholly meets the requirements set out in SPPR 4 of the *Compact Guidelines*.

5.8.5 Private Open Space

SPPR 2 of the *Compact Guidelines* states that:

"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.” [Our Emphasis]

SPPR 2 requires apartments to be designed to comply with the minimum private open space standards set out in the *Apartment Guidelines*. As such, please see Section 5.6 above where it is demonstrated that the private open space assigned to each apartment meets and, in some instances, exceeds the minimum standards.

5.8.6 Public Open Space

Policy and Objective 5.1 of the *Compact Settlement Guidelines* relates to public open space provision, setting out the following:

"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.

In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site."

The quantum of public open space proposed totals to 1,142 sq m, equivalent to 13% of the net site area. Therefore, the proposed development complies with this policy and objective.

5.8.7 15-Minute City

The *Compact Settlement Guidelines* state that international experience shows that compact settlements with an integrated network of well-designed and mixed-use neighbourhoods have many benefits. These neighbourhoods tend to offer improved access to services and amenities, better integration with existing infrastructure and public transport, more efficient use of land, and facilitate and support a transition to lower carbon living. The term '15 minute city' has been used in recent years to describe compact neighbourhoods with a range of local services and amenities and access to public transport all within a short walk or cycle of homes.

The *Compact Settlement Guidelines* state that this should be the overarching objective when planning for sustainable residential development and compact settlements. Planning Authorities at settlement level should plan for an integrated network of well-designed neighbourhoods that can meet day-to-day needs (such as food, healthcare, education, sports and professional services) within a short 10-to-15-minute walk (approximately) of all homes. In the case of larger settlements, the residents of less central neighbourhoods should have opportunities to travel by public transport and other sustainable modes (e.g. greenways) to access higher order services, employment and amenities at more central and accessible locations. This will reduce the need for travel and the need for travel by private car, supporting the transition to a lower carbon society and the creation of settlements that are more socially inclusive.

In this regard, the site is proximate to existing and proposed high quality public transport, providing sustainable travel options for future residents of the site, ensuring reduced parking can be provided on site in line with a transition to lower carbon living. Furthermore, the site is within walking distance of employment generating opportunities, services, and facilities in Swords Town Centre and Swords Business Park.

The *Compact Guidelines* further state:

“In order to achieve compact growth, we will need to support more intensive use of existing buildings and properties, including the re-use of existing buildings that are vacant and more intensive use of previously developed land and infill sites, in addition to the development of sites in locations served by existing facilities and public transport” [Our Emphasis]

We consider that the proposed development represents a sustainable use of this infill, highly underutilised site in proximity to high quality public transport, services and amenities and can be considered to represent the policies and objectives of the 15-minute city.

5.9 *Design Manual for Urban Roads and Streets (2019)*

The *Design Manual for Urban Roads and Streets* (DMURS) sets out an integrated design approach for creating new and redeveloping existing routes to ensure that they are secure, connected and attractive. The guidance document outlines several key objectives and design principles, most notably the promotion of sustainable modes of transport such as; prioritising walking, cycling and use of public transport. DMURS outlines practical guidance for the design of roads and streets which have been taken into consideration during the design process of the proposal at the subject of the report.

5.9.1 Policy Background

The *Design Manual for Urban Roads and Streets* references the *Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2020* document which was published by the Department of Transport. The key goals as set out within the *Smarter Travel* document include:

- 1) To reduce overall travel demand;
- 2) To maximise the efficiency of the transport network;
- 3) To reduce reliance on fossil fuels;
- 4) To reduce transport emissions; and
- 5) To improve accessibility to public transport.

Given the accessible location of the application site (especially give the proximity of the planned Swords Central Station), it is projected that residents of the scheme would largely rely on walking, cycling or utilising existing and proposed public transport routes to reach their place of work. Due to availability of public transport and the large quantum of employment opportunities in the vicinity, car parking is limited to 24 No. spaces within the proposed development. The scheme is considered to be consistent with the key policy goals as set out in *Smarter Travel – A Sustainable Transport Future A New Transport Policy for Ireland 2009 – 2020*.

5.9.2 Site Layout and Legibility

As noted previously, the proposed development promotes permeability and legibility through the site by providing pedestrian and cyclist links for example in addition to pedestrian access points. Car parking is provided at a reduced level which will minimise traffic movements.

We note that the development has been designed in accordance with DMURS. The proposed high-quality designed layout of the scheme will ensure that the scheme will be legible in the streetscape while also sitting comfortably within its context.

5.9.3 Sustainable Transport

A *Mobility Management Plan* has been prepared by OCSC Consulting Engineers and is enclosed with this application. The site is served by bus services and the planned Meto Link stop at Swords Central Station will be a huge benefit for the area.

The DMURS publication references that the Smart Travel document includes a "vision to create a strong cycling culture in Ireland and ensure that all cities, towns and villages will be cycling friendly and that cycling will be a preferred way to get about, especially for short trips." The proposed scheme provides 404 No. bicycle parking spaces in total (with additional lockers provided that could also be used for cycle storage) ensuring that sustainable modes of transport are encouraged.

As established in the above commentary, it has been demonstrated that the proposed scheme is consistent with the guidance as per the *Design Manual for Urban Roads and Streets (2019)*.

In respect of achieving DMURS objectives, the *DMURS Statement of Consistency* prepared by OCSC Consulting Engineers states that:

"Taking the above into consideration, the proposed development has incorporated a series of design measures to promote more sustainable modes of transport and support vulnerable road users which is in line with the core principles of DMURS and all other relevant guidance."

The *DMURS Statement of Consistency* sets out specific attributes of the scheme design which contribute to achieving this DMURS objective.

5.10 *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*

The *Planning System and Flood Risk Management Guidelines (2009)* published by the Government of Ireland includes the following core objectives:

- Avoid inappropriate development in areas at risk of flooding;
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;
- Ensure effective management of residual risks for development permitted in floodplains;
- Avoid unnecessary restriction of national, regional or local economic and social growth;

- Improve the understanding of flood risk among relevant stakeholders; and
- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.

The Site-Specific Flood Risk Assessment has been prepared by OCSC Consulting Engineers and is included in Section 6.o of the accompanying *Engineering Services Report* and concludes the following:

“The proposed development site has been assessed in accordance with the “The Planning System and Flood Risk Management” Guidelines. As part of the sequential test, the OPW flood hazard maps have been consulted, as have the Catchment Flood Risk Assessment Maps produced by the OPW, and the Strategic Flood Risk Assessment mapping in the Fingal Development Plan.

*In all cases it was found that the development is located outside the extent of Flood Zones A and B, at low risk of flooding, and the ‘Vulnerable Development’ is deemed appropriate within the proposed site location. **Therefore, a Stage 2 – Initial Flood Risk Assessment is deemed not required, as per the PFRM Guidelines.**” [Our Emphasis]*

Thus, the proposed development is acceptable having regard to the objectives of *The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009)*.

5.11 **Guidelines for Planning Authorities on Childcare Facilities (2001)**

National guidance with respect to Childcare Facilities is principally contained in the *Childcare Facilities: Guidelines for Planning Authorities (2001)* (*‘Childcare Facilities Guidelines’*). They were drafted to provide Planning Authorities and Developers with guidance in relation to the provision of Childcare Facilities, in terms of their location, scale and design.

The *Childcare Facilities Guidelines* sets out the following:

*“Access to quality childcare services contribute to the social, emotional and educational development of children. There are clear economic benefits from the provision of childcare. The lack of accessible, affordable and appropriate childcare facilities makes it difficult for many parents/guardians to access employment and employment related opportunities...In relation to new housing areas, a standard of one childcare facility providing for **a minimum 20 childcare places per approximately 75 dwellings may be appropriate.**” [Our Emphasis]*

The *Childcare Facilities Guidelines* stipulate that Planning Authorities should require one childcare facility (providing for a minimum of 20 No. childcare places) per approximately 75 No. dwellings, *“unless there are significant reasons to the contrary for example, development consisting of single bed apartments or where there are adequate childcare facilities in adjoining developments.”* It is also noted that the *Apartment Guidelines* state 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.”

A *Childcare Demand Assessment* has been prepared by Thornton O'Connor Town Planning and is submitted herewith. The estimated childcare demand generated from the proposed development, based on 62 No. 2-bed units, would equate to 18 No. 0-6-year-old residents; however, based on the Census 2022 data, only 22% of children in Fingal attended a childcare facility. Therefore, only 4 No. children from the proposed development would attend a childcare facility.

The number of existing childcare facilities in proximity to the subject site and their capacity to cater for additional children was surveyed, in which the following was concluded:

*"In our opinion, there is sufficient existing provision of childcare infrastructure in the vicinity of the subject site (i.e., within c. 2 km radius) to support the proposed development. As the above survey demonstrates, there is an adequate supply of facilities within walking available to local residents offering a higher-than-average per capita ratio of childcare places. While there was no material level of vacancy identified within existing childcare facilities **the size of the proposed development is unlikely to impact on the quality of services and facilities currently available in the locality.**"*
[Author's Emphasis]

5.12 **Part V of the Planning and Development Act**

Part V of the Planning and Development Act: Guidelines issued by the Minister for Housing, Planning, Community and Local Government details the application of Part V of the *Planning and Development Act 2000* (as amended) and provides instruction on how to achieve the delivery of social housing as part of residential schemes.

To comply with the Part V requirements of the *Planning and Development Act 2000* (as amended), we note that the subject site was purchased by the Applicant post August 2021 and therefore a total of 24 No. Part V units have been provided as part of the proposed development (11 No. 1-bed units and 13 No. 2-bed units).

5.13 **Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities**

The undertaking of Appropriate Assessment (AA) is to ensure the protection and integrity of statutorily protected environments/sites. These sites are protected by the Birds Directive (2009/147/EC (as amended)) and the Habitats Directive (1992/43/EEC (as amended)), and by Natura 2000. In Ireland, such areas are identified as: Special Areas of Conservation (SACs) and Special Projection Areas (SPAs). National guidance in *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities* (2009) states that:

"AA is an impact assessment process that fits within the decision-making framework", adding that while *"the requirement [to undertake AA] is not to prove what the impacts and effects will be[, if any], but rather to establish beyond reasonable scientific doubt that adverse effects on site integrity will not result".*

As shown in the figure below, there are 4 No. principal stages to AA. For the development at the subject site, the enclosed *Appropriate Assessment Screening Report* screened out at Stage 1 the prospect that the proposal would not have any significant effect on any European sites:

“On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available and objective information, that the possibility of any significant effects on the above-listed European sites, whether arising from the project itself or in combination with other plans and projects, can be excluded in light of the above listed European sites’ conservation objectives. Thus, there is no requirement to proceed to Stage 2 of the Appropriate Assessment process; and the preparation of an NIS is not required.”

For full details, please refer to Scott Cawley’s *Appropriate Assessment Screening Report*, included under separate cover.

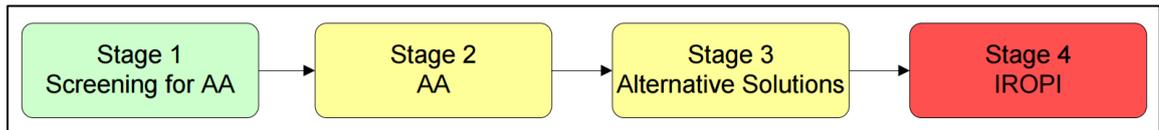


Figure 5.3: The 4 No. Stages of the Appropriate Assessment Process

Source: *Appropriate Assessment of Plans and Projects in Ireland: Guidance for Planning Authorities (2009)*

Overall, as demonstrated throughout this section, the proposed scheme is consistent with all relevant National Policy Documents.

6.0 STATEMENT OF CONSISTENCY - REGIONAL PLANNING POLICY

This Section will demonstrate that the proposed development has been designed with due consideration of Regional Policy and is consistent with the objectives and guidance as set out within the *Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019-2031*.

6.1 Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019-2031.

Published by the Eastern & Midland Regional Assembly ('EMRA') in June 2019, the *Regional Spatial & Economic Strategy 2019-2031* ('RSES') is the EMRA's strategic plan and investment framework for shaping the future of development within the eastern and midland region to 2031 and beyond. The RSES, which coincides with the NPF, comprises Regional Strategic Outcomes ('RSO') and associated Regional Policy Objectives ('RPO'), which promote, *inter alia*, the compact growth and sustainable development of urban areas.

Section 2.3 of the RSES sets out 16 No. Regional Strategic Outcomes. Of note is RSO No. 2 'Compact Growth and Urban Regeneration', which aims to:

*"Promote the regeneration of our cities, towns and villages by **making better use of underused land** and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens."* [Our Emphasis]

Furthermore, RPO 4.3 'Consolidation and Re-Intensification' aims to:

*"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."* [Our Emphasis]

The subject site, having regard to its zoning and location in proximity to key services and public transport nodes, is eminently suitable for residential development. Consistent with both National and Regional Planning Policy, the proposed development, as detailed herein, will ensure the appropriate intensification and densification of an appropriately zoned infill site.

6.1.1 Dublin Metropolitan Area Strategic Plan

Contained within the RSES, the *Dublin Metropolitan Area Strategic Plan* ('MASP') is aligned with a number of RSO's in the RSES including managing the sustainable and compact growth of Dublin, the regeneration of cities and better use of underutilised land and integrated transport and land use.

In respect of compact growth and accelerated housing delivery, the MASP sets out the following guiding principle for the sustainable development of the Dublin Metropolitan Area:

*"To promote **sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development**, to achieve a target of 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs, and at least 30% in other settlements. To support a steady supply of sites and to accelerate housing supply in*

order to achieve higher densities in urban built up areas, supported by improved services and public transport.” [Our Emphasis]

The subject site is located within the built-up footprint of Swords, with the area surrounding the site comprising existing development, resulting in the infill nature of the site. The proposed development seeks to introduce a higher-density residential development comprising 123 No. units and large quantum of public open space on a clearly underutilised and highly accessible site.

The *MASP* identifies the need to provide a steady stream of sites and residential development to meet the ongoing housing demand. There are 2 No. RPO’s that address this housing delivery need through higher densities within the Dublin Metropolitan 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’, ‘Sustainable Urban Housing: Design Standards for New Apartments’ Guidelines and ‘Urban Development and Building Heights Guidelines for Planning Authorities’.” [Our Emphasis]

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.” [Our Emphasis]

Low-to-medium-density residential developments have been permitted further out than the subject site from Swords Town Centre, public transport, services and facilities, such as the Waterside development to the south-east of the site. The subject site, which is highly accessible due to its location relative to Swords Town Centre and to high-quality public transport nodes such as the future Swords Central Station, is capable of facilitating higher-density housing on an underutilised, infill site that is sequentially appropriate for development. The subject site is located within a mixed-use area and is zoned appropriately in the *Development Plan* to provide residential development and public open space. Therefore, the proposed high-density residential development is considered to accord with the objectives of the *RSES* and *MASP*.

Furthermore, Section 9.3 states that:

“It is widely acknowledged that there is a need for a significant increase in the delivery of housing in the State. The NPF identifies a national target of at least 25,000 new homes, half of which are expected in our Region, being annually required in order to satisfy the State’s housing needs up to 2040. Achieving this level of supply will require increased national output of 30,000 to 35,000 homes per annum in the years to 2027, to deal with a deficit that has built up since 2010, and will be subject to monitoring and review.”

Whilst these numbers are outdated and now underestimated, the proposed development, by providing 123 No. high-quality residential units of varying sizes, will contribute to increasing the supply of housing in this prime location in the Dublin Region, providing the type of units most in demand- one and two bedroom units. Having regard to the foregoing, it is submitted that the proposed development represents the proper planning and sustainable development of the subject site.

7.0 STATEMENT OF CONSISTENCY - LOCAL POLICY

The purpose of this section is to detail the relevant policies and objectives applicable in relation to the proposed development on the subject site. The *Fingal Development Plan 2023 – 2029* (*Development Plan*) is the statutory plan for the area and guides development relating to the subject site.

7.1 Zoning

As shown in Figure 7.1 below, the subject site is zoned 'MRE-Metro and Rail Economic Corridor' in the *Development Plan* where the stated objective is to "facilitate opportunities for high-density mixed-use employment generating activity and commercial development, and support the provision of an appropriate quantum of residential development within the Metro and Rail Economic Corridor".

The vision for MRE zoned lands is to:

"Provide for an area of compact, high intensity/density, employment generating activity with associated commercial and residential development which focuses on the MetroLink, or rail or light rail stations within settings of exemplary urban design, public realm streets and places, which are permeable, secure and within a high-quality green landscape. Landmark buildings will provide strong quality architectural features, which respect and enhance the character of the area into which they sit. The designated areas will form sustainable districts which possess a high degree of connectivity and accessibility and will be developed in a phased manner subject to the necessary provision of social and physical infrastructure." [Our Emphasis]

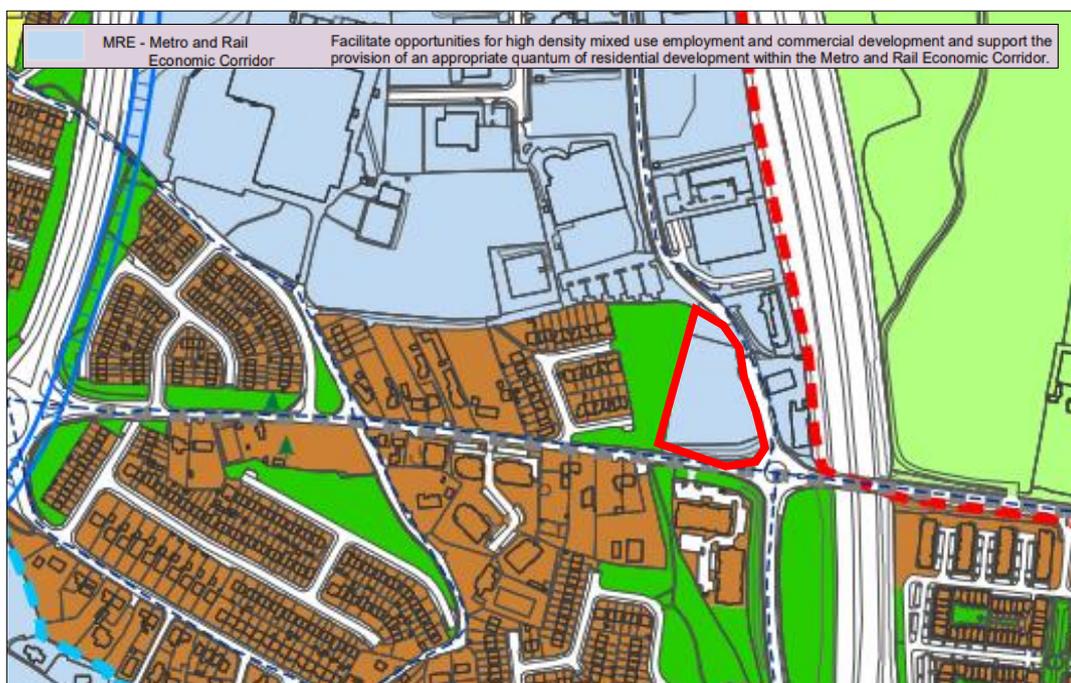


Figure 7.1: Zoning Map Sheet 8 With the Subject Site Outlined Indicatively in Red

(Source: *Fingal Development Plan 2023 - 2029*, Annotated by Thornton O'Connor Town Planning, 2024)

Residential use is permitted in principle on lands zoned MRE and thus the provision of 123 No. residential units is an acceptable use at the subject site.

Please see the accompanying *Response to Fingal County Council's Opinion* for a full justification and rationale for the residential quantum proposed for the subject development. In summary, Thornton O'Connor Town Planning are of the opinion that the proposed Large-Scale Residential Development on the MRE zoned lands is appropriate and suitable, and fully complies with the site's zoning objective having regard to the following:

- 1) The subject site previously formed part of a larger landholding comprising the Applegreen Service Station to the east and therefore a commercial use is already present, allowing an "*appropriate quantum of residential development*" to be provided;
- 2) The quantum of residential development proposed is more appropriate than providing commercial units due to the express requirement to provide much needed housing and the possible vacancy of any future units, as expressed by the Planning Authority in their assessment of the previous application at the site;
- 3) There is a significant quantum of commercial/industry uses already existing on the MRE zoned lands to the north of the subject site, within Swords Business Park, with the only residential use present is a single dwelling along the northern boundary of the MRE zoned lands;
- 4) There is limited MRE zoned land left north of the subject site and it is anticipated that any future development on the remaining greenfield lands in Swords Business Park is likely to reflect the existing commercial activities;
- 5) Fingal County Council have permitted planning applications for developments consisting solely residential on other MRE zoned lands acknowledging it fully complies with the site's zoning objective; and
- 6) The proposed development is in accordance with the vision for MRE zoned lands as it demonstrates a high-quality urban design, provides a large quantum of landscaped public open space, and provides permeable and accessible linkages through the site for the wider connectivity.

Therefore, it is considered that the quantum of residential development proposed is appropriate and is wholly in accordance with the MRE zoning objective and vision for the subject site.

7.2 Relevant Policies and Objectives for Infill Development on Underutilised Land

Section 3.5.13 of the *Development Plan* highlights the need to make better use of underutilised sites located within the existing built-up urban footprint and how the redevelopment or repurposing of vacant commercial properties or extensive brownfield sites can provide much needed high-quality housing in the Fingal County area. The development of underutilised sites can result in additional housing typologies and sizes in the area and increase the vibrancy of the towns and villages whilst having regard to the design and impact on neighbouring residential amenity. In this regard, the following Policies and Objectives of the *Development Plan* are of most relevance:

Policy SPQHP38 - Compact Growth, Consolidation and Regeneration

“Promote compact growth in line with the NPF and RSES through the inclusion of specific policies and targeted and measurable implementation measures that:

- **Encourage infill/brownfield development**
- *Focus growth on the County’s designated strategic development areas identified in the Metropolitan Area Strategic Plan*
- **Promote increased densities along public transport corridors.” [Our Emphasis]**

Policy SPQHP39 - Co-Ordinated Development

“Promote residential development addressing shortfalls in housing provision and meeting target guidance figures through a co-ordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant and underutilised sites.” [Our Emphasis]

Objective SPQHO37 - Residential Consolidation and Sustainable Intensification

“Promote residential consolidation and sustainable intensification at appropriate locations, through the consolidation and rejuvenation of infill/brown-field development opportunities in line with the principles of compact growth and consolidation to meet the future housing needs of Fingal.” [Our Emphasis]

Objective SPQHO38 - Residential Development at Sustainable Densities

“Promote residential development at sustainable densities throughout Fingal in accordance with the Core Strategy, particularly on vacant and/or under-utilised sites having regard to the need to ensure high standards of urban design, architectural quality and integration with the character of the surrounding area.” [Our Emphasis]

Objective SPQHO39 - New Infill Development

“New infill development shall respect the height and massing of existing residential units. Infill development shall retain the physical character of the area including features such as boundary walls, pillars, gates/gateways, trees, landscaping, and fencing or railings.”

Policy CSP14 - Consolidation and Re-Intensification of Infill/Brownfield Sites

“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.” [Our Emphasis]

Objective CSP18 - Promotion of Residential Development

“Promote residential development addressing the current shortfall in housing provision and meeting target guidance figures, through a co-ordinated planned

approach to developing **appropriately zoned lands** at key locations, including regeneration areas, and **vacant and underutilised sites.**" [Our Emphasis]

Objective CSP19 - Compact, Sequential and Sustainable Urban Growth

"Promote **compact, sequential and sustainable urban growth** to realise targets of at least 50% of all new homes to be built, within or contiguous to the existing built-up area of Dublin city and suburbs and a target of at least 30% for other metropolitan settlements, with a focus on healthy placemaking and improved quality of life." [Our Emphasis]

Objective DMSO32 – Infill Development on Corner / Side Garden Sites

"Applications for residential infill development on corner/side garden sites will be assessed against the following criteria:

- *Compatibility with adjoining structures in terms of overall design, scale and massing. This includes adherence to established building lines, proportions, heights, parapet levels, roof profile and finishing materials.*
- *Consistency with the character and form of development in the surrounding area.*
- *Provision of satisfactory levels of private open space to serve existing and proposed dwelling units.*
- *Ability to safeguard the amenities of neighbouring residential units.*
- *Ability to maximise surveillance of the public domain, including the use of dual frontage in site specific circumstances.*
- *Provision of side/gable and rear access arrangements, including for maintenance.*
- *Compatibility of boundary treatment to the proposed site and between the existing and proposed dwellings. Existing boundary treatments should be retained/ reinstated where possible.*
- *Impact on street trees in road-side verges and proposals to safeguard these features.*
- *Ability to provide a safe means of access and egress to serve the existing and proposed dwellings.*
- *Provision of secure bin storage areas for both existing and proposed dwellings*

Furthermore, the following is taken from Table 14.4 of the *Development Plan* which provides a list of requirements for infill development:

- *"Provide a high-quality design response to the context of the infill site, taking cognisance of architectural form, site coverage, building heights, building line, grain, and plot width.*
- *Examine and address within the overall design response issues in relation to over-bearance, overlooking and overshadowing.*
- *Respect and compliment the character of the surrounding area having due regard to the prevailing scale, mass, and architectural form of buildings in the immediate vicinity of the site.*
- *Provide a positive contribution to the streetscape including active frontage, ensuring that the impacts of ancillary services such as waste management, parking and services are minimised.*

- *Promote active street frontages having regard to the design and relationship between the public realm and shopfronts of adjacent properties."*

In response to the abovementioned Policies, Objectives and guidance of the *Development Plan*, the design and layout of the proposed development has been carefully considered by a highly experienced Design Team to ensure there will be no negative or significant impact on the streetscape, neighbouring properties and character of the area. The following provides a summary of how the proposed development, at a highly underutilised, infill site, accords with the requirements mentioned above:

- The proposed development seeks to concentrate the built form in the southern portion of the site, with car parking, landscaping and public open space encapsulating the remainder of the site to provide visual relief. This results in only 25% of the net site area covered by the building footprint, representing an appropriate intensification of the site;
- The height of the proposed development at part 4 No. to part 5 No. storeys (maximum 19.27 metres) is only a minor increase to the prevailing height of the area where 2-4 No. storey residential buildings are present. Additionally, a building height of up to 6 No. storeys (maximum height of 19.9 metres) was previously accepted by Fingal County Council and An Bord Pleanála at the site.
- The concentration of the building towards the R106 contributes positively to the activation of the streetscape and create visual interest through various setbacks and modulation along the building's elevations, in combination with the range of materials and colour palette.
- The generous separation distance between the proposed apartment block and neighbouring dwellings in Seamount View to the west and St. Werburghs to the south, as well as between residential units opposite each other within the development itself, ensures the privacy and amenity of existing and future residents is protected.
- Having regard to the proposed height and separation distance of the development, there will be no overbearing or overlooking impact experienced by nearby residents. The *BRE Daylight and Sunlight Assessment* also confirms that there will be no impact to the level of daylight and sunlight received in nearby properties.
- Out of the 123 No. units proposed, 76 No. units will be dual aspect, representing 61.79% of the total number of units and ensuring high levels of residential amenity as bright and spacious living environments. This also demonstrates the high quality nature of the proposed Site Plan.
- The proposed development will include numerous pedestrian and cyclist linkages and routes in and around the site, increasing the level of connectivity and permeability locally and ensuring a high level of passive surveillance of the public open space and wider site.
- The accompanying *Landscape and Visual Impact Assessment* demonstrates that "*the proposed development will not have a significant impact on the existing landscape or visual amenity of the subject site.*"

Therefore, in our professional planning opinion, the proposed development represents an appropriate intensification and densification of an infill site that is located in a highly accessible location. The development of this appropriately zoned and highly underutilised site will provide much needed housing whilst having regard to the potential impact to the character of the area and nearby properties.

7.3 Relevant Policies and Objectives for Residential Development

7.3.1 Dwelling Mix

No specific unit mix is set by the Development Plan (or its Housing Strategy), although it states that Planning Applications for development should include: "...a dwelling mix providing a balanced range of dwelling types and sizes to support a variety of households." It adds:

Objective CSO17 - Mixture of House Types

"Promote high quality residential development which meets the needs of all stages of the life cycle through an appropriate mix of house type and local amenities."

Objective SPQHO31 - Variety of Housing Types

"Encourage the creation of attractive, mixed use and sustainable residential communities which contain a wide variety of housing and apartment types, sizes, tenures and typologies in accordance with the Fingal Housing Strategy, the HNDA with supporting community facilities, amenities and services."

However, we note unit mix guidance provided under the *NPF* and *Apartment Guidelines*:

Section 6.6 of the NPF states:

"Between 2018 and 2040, an average output of at least 25,000 new homes will need to be provided in Ireland every year to meet the needs for well-located and affordable housing, with increasing demand to cater for one and two-person households." [Our Emphasis]

Section 6.6 of the NPF further highlights that:

"Currently, 7 out of 10 households in the State consist of three people or less, with an average household size of 2.75 people. This is expected to decline to around 2.5 people per household by 2040. Household sizes in urban areas tend to be smaller than in the suburbs or rural parts of the country. In Dublin city, one, two and three person households comprise 80 percent of all households³⁶. Yet, the stock of housing in Ireland is largely comprised of detached and semi-detached houses with three to four bedrooms."

More specifically, SPPR 1 of the Apartment Guidelines states:

"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)."

The *NPF* emphasises the need to provide smaller sized housing units in order to respond to the lack of housing supply in accessible locations and to cater for people seeking affordable housing options, whilst the *Apartment Guidelines* allows up to 50% of the total unit mix to be 1-bed units.

In addition to the explicit demand for smaller size housing units, such as 1-and-2-bed units, Table 7.1 below provides the results of the Census 2022 survey and demonstrates that there is an undersupply of 1-and-2-bed units across both Fingal and Swords Town. At just 3.67% out of the total housing stock in Swords Town and 3.87% across Fingal, there is clearly a deficit in the supply of 1-bed units. Evidently there is a sufficient supply of 3-bed units, equating to 45.81% of the total housing stock in Swords Town and 38.84% in Fingal.

Unit Size	Swords Town		Fingal	
	No. of Bedrooms	% of Total Bedrooms	No. of Bedrooms	% of Total Bedrooms
1-Bed	501	3.67%	4,163	3.87%
2-Bed	2,486	18.22%	20,652	19.19%
3-Bed	6,250	45.81%	41,796	38.84%
4-Bed	2,943	21.57%	25,994	24.16%
5-Bed+	432	3.17%	6,021	5.6%
Not Stated	1,031	7.56%	8,973	8.34%
Total	13,643	100%	107,599	100%

Table 7.1: Census (2022) Results for 'Permanent Private Households and Number of Persons in Permanent Private Households' in Swords Town and Fingal

(Source: Census 2022 Interactive Map - www.visual.cso.ie, Table Created by Thornton O'Connor Town Planning, 2024)

Having regard to the explicit requirement of the *NPF* to provide smaller size units in urban and accessible locations, the allowance of up to 50% of total residential units to be 1-bed units, as well as the evident undersupply of smaller size units currently provided in both Swords Town and Fingal, the proposed 123 No. residential development comprises 55 No. 1-bed units (44.7%), 6 No. 2-bed, 3-person units (4.9%) and 62 No. 2-bed, 4-person units (50.4%). As is evident, the mix complies with SPPR 1 of the *Apartment Guidelines*, with 1-bed units not exceeding 50%.

Furthermore, we note that the area surrounding the subject site comprises mainly 2-bed+ apartments, duplexes and houses, with little to no 1-bed units available. Therefore, the introduction of a new and smaller housing size to the area will provide an affordable option for people looking to downsize or start off on the property ladder.

In conclusion, it is considered that the proposed unit size mix is consistent with both the *National Planning Framework* and the *Apartment Guidelines*.

7.3.2 Separation Distances

With respect to separation distances, Objective DMSO23 of the *Development Plan* states that:

"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."

As demonstrated in Section 4.7 above, and in the submitted plans prepared by Coady Architects, the minimum 22-metre separation distance requirement set out in the *Development Plan* is met, and in most cases, significantly exceeded. Furthermore, the *BRE Daylight and Sunlight Assessment* submitted herewith assesses the impact of the proposed development in terms of the levels of daylight and sunlight achieved in neighbouring residential dwellings, commercial properties, and the proposed residential units within the scheme itself. The *BRE Daylight & Sunlight Assessment* concluded the following:

"The site is mostly surrounded by Commercial Properties which do not have the same requirements for daylight/sunlight as Residential Properties do."

The Residential Properties are situated a far distance away from the Proposed Development and will not be impact by the Proposed Development."

The performance of the Proposed Development itself, performs exceptionally well, with very high levels of daylight and sunlight being achieved for the residents."

Therefore, due to the proposed separation distance (and building height) the amenity of neighbouring residential and commercial properties will remain unaffected from a daylight and sunlight perspective, as well as the residential units in the proposed scheme.

7.3.3 Open Space in Residential Development

7.3.3.1 Public Open Space

Section 4.5.2 of the *Development Plan* sets out the standards for open space and outlines the following regarding same:

"The availability of good quality, highly accessible public spaces in close proximity to our homes is a vital local resource and an important element in the establishment of successful neighbourhoods and in fostering a sense of place."

The *Development Plan* outlines five basic principles of open space provision to achieve high-quality open space, namely Hierarchy, Accessibility, Quantity, Quality and Private Open Space (this principle is discussed in Sub-Section 7.3.3.3 below).

Hierarchy and Accessibility

Section 4.5.2.1 of the *Development Plan* outlines that:

"for all developments with a residential component, a mix of public open space types should be provided where achievable."

Furthermore, Objective CIO36 of the *Development Plan* set out that it is an Objective of the Council to:

"Provide a wide variety of resiliently designed, sustainably managed and accessible public open spaces, including allotments, community gardens, parklands and sporting facilities, on a hierarchical basis throughout the County in order to achieve a choice of open space facilities. Best practice Green Infrastructure Guidelines should be used to determine the location and type of open spaces to be provided."

In response, the proposed development comprises a mix of high-quality spaces within the public open space provision (totalling 1,142 sq m), that will complement the existing open spaces in the locality.

Quantity

As regards quantity, Objective DMSO51 of the *Development Plan* sets out that it is an Objective of the Council to:

"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."

Having regard to the proposed dwelling mix (123 No. units – all 1-and-2-bed units) and the occupancy rate for dwellings as set out in Objective DMSO51 (1.5 persons per dwelling), the proposed development, based on a total occupancy of 185 No. residents, should provide 0.463 Ha (463 sq m) of public open space. Notwithstanding this, Table 4.3 of the *Development Plan* sets out a minimum of 12% of a site area should be designated for use as public open space on infill sites. Based on the developable site area of 0.8731 Ha (8,731 sq m), the minimum public open space to be provided for the proposed development would be 1,048 sq m.

The proposed public open space provision is 1,142 sq m, which represents 13% of the developable site area. Therefore, the public open space provision exceeds the minimum requirement.

Furthermore, there is 589 sq m of environmental open space proposed which will provide visual amenity for future residents and people passing by and will increase the biodiversity on site. Although this space is not counted towards the total public open space provision, it represents another 8% of the site that will contribute positively to the wider area.

Quality

Section 4.5.2.4 of the *Development Plan* states the following regarding the quality and design of public open spaces:

"High quality open space and recreational facilities will ensure that these spaces are frequently used and enjoyed by residents. Different types of open space and recreational

facilities meet different needs and therefore have different functions. The larger open spaces and recreational facilities should ideally combine passive and active recreational uses.

Careful consideration should go into the design of public open spaces, and they should be provided to a high specification. Emphasis must be placed on quality, and details of the proposed landscaping, hard and soft, of these spaces will be required at the planning application stage. Public open spaces should be overlooked and designed in a manner to reduce the occurrence of anti-social behaviour."

The open space has been designed to create an attractive environment with a mix of high-quality, easily accessible, usable spaces within the public open space to the north, which provide for passive and active forms of recreation. Furthermore, the layout has been designed to ensure the passive surveillance of the public open space and public realm. Details of, *inter alia*, the design of the public open space can be found on and within the enclosed *Landscape Plan* and *Landscape Report* prepared by Áit Urbanism + Landscape.

7.3.3.2 Communal Open Space

Section 14.6.5 of the *Development Plan* describes communal open space as the following:

"Communal open space is open space which is designated for the use of a designated set of residents within a development and is generally maintained by a Management Company. This type of open space is typical of apartment type residential developments but may also form part of some housing schemes. Access may be restricted to specific residents for their exclusive semi-private use."

Table 14.7.1 of the *Development Plan* outlines the following minimum standards, which align with the *Apartment Guidelines*:

Unit Type	Communal Open Space Required
Studio	4 sq m
One Bedroom	5 sq m
Two Bedroom (3 No. person)	6 sq m
Two Bedroom (4 No. person)	7 sq m
Three Bedroom	9 sq m

The proposed development requires some 745 sq m of communal open space, based on the proposed residential mix of 55 No. 1-bed units, 6 No. 2-bed (3-person) units and 62 No. 2-bed (4-person) units.

The proposed development includes 1,011 sq m of communal amenity space, including 932 sq m of external communal open space and some 79 sq m of internal communal amenity space. The proposed space is c. 35.7% in excess of the minimum standards. The proposed communal open space is therefore in accordance with the requirements set out in the *Development Plan*.

7.3.3.3 Private Open Space

Objective DMSO73 of the *Development Plan* sets out the following regarding private open space:

“Require private balconies, roof terraces or winter gardens for all apartments and duplexes comply with or exceed the minimum standards set out in Table 14.14.”

Aligning with the standards set out in the *Apartment Guidelines*, Table 14.4 provides the following minimum private open space requirements for residential developments:

Unit Type	Private Open Space Required
Studio	4 sq m
One Bedroom	5 sq m
Two Bedroom (3 No. person)	6 sq m
Two Bedroom (4 No. person)	7 sq m
Three Bedroom	9 sq m

Private open space has been provided for each apartment in the form of a balcony or terrace. The balconies and terraces have a minimum depth of 1.5 metres and are directly accessible from the main living spaces in the units. The private amenity space for the 1-bed units range in size between 5.3 sqm and 14.2 sqm, between 6 sq m and 7 sq m for the 2-bed (3-persons) units, and 7 sq m and 10.3 sq m for the 2-bed (4-persons) units.

As such, the proposed private open space provision is in line with the requirements set out in Table 14.14 of the *Development Plan* above.

7.3.3.4 Play Provision

Table 14.11 of the *Development Plan* sets out the play space standards for various types and sizes of public open space. Based on the quantum of public open space proposed at 1,142 sq m, a minimum of 20% (228.4 sq m) of the public open space shall be dedicated to play provision, as set out below:

Type of Public Open Space	Pocket Parks
	(Class 2 as per Development Contribution Scheme) Facilities for smaller children, but not necessarily formal play facilities. Have an important visual and social function also. Pocket parks must not be to the side or back of houses and must be adequately overlooked.
Size of Park /Open Space	Between 500 sq.m – 0.2 hectares.
Distance from homes	Within 100–200 metres walking distance of homes.
Level of Play provision	LAP (Local Area for Play). Minimum 10m x 10m to approximately 20% of public open space depending on calculated provision.
Age group catered for	Intended primarily for children up to the age of 6, though it will be used by older children at different times of the day or evening.
Description of Play Space	Accessible and inclusive landscaped areas for play. Imaginatively designed and contoured, using as far as possible natural materials such as logs or boulders with associated planting which create an attractive setting for play.

The proposed public open space to the north of the site seeks to provide 137 sq m of natural play space. Although this is below the minimum requirement set out in Table 14.11 of the *Development Plan*, it was not possible to provide an additional 91.4 sq m of play space due to the need to provide a sufficiently sized detention basin to cater for surface water runoff from the site. The detention basin will also act as kickabout space where children will be able to enjoy a large expanse of green space, further contributing to play provision. It is therefore considered that the quantum of play provision proposed within the public open space is sufficient to cater for the subject development.

Furthermore, residents of the development will be able to benefit from the 193 sq m of play space provided in the communal courtyard of the development. This brings the total play space proposed to 330 sq m which is considered sufficient to cater for the proposed development.

7.3.4 Car Parking

Table 14.19 of the *Development Plan* sets out the car parking standards for various land uses in Fingal and includes a **maximum standard** of 0.5 No. spaces per unit for 1-and-2-bed units in Zone 1. Lands within Zone 1 are defined as follows:

“Developments within 800m of Bus Connects spine route, or 1600m of an existing or planned Luas/Dart/Metro Rail station or within an area covered by a Section 49 scheme, or in lands zoned Major Town Centre.”

The site is within c. 800 metres walking distance of the planned Metro Swords Central Station to the south-west of the site along the R132. Therefore, the subject site falls within Zone 1 and the maximum car parking standard, based on 123 No. units, is 62 No. spaces.

The proposed development provides for 24 No. car parking spaces and thus does not exceed the maximum standard set out in the *Development Plan*. Similar to the justification provided for the reduced parking standards from that set out in SPPR 3 of the *Compact Settlement Guidelines* (Section 5.8.3 above), the reduced car parking is appropriate for this sustainable location given the proximity of the site to existing and planned high-quality public transport infrastructure. The provision of 6 No. car-club spaces and 404 No. bicycle parking spaces will ensure there are alternative methods of transport available for the development to discourage car ownership. It is also noted that these standards, both set out in the *Development Plan* and *Compact Settlement Guidelines*, are **maximum standards and not minimum requirements**.

7.3.5 Bicycle Parking

Table 14.17 of the *Development Plan* sets out the following minimum bicycle parking standards for residential developments providing 1-and-2-bed units:

- Long Term Parking: 1 No. space per unit + 1 No. space per bedroom; and
- Short Term: 0.5 No. spaces per unit.

Based on the *Development Plan* requirements, the proposed development would require a minimum of 314 No. long-term cycle spaces and 62 No. short-term spaces, totalling to 376 No. spaces. The proposed development seeks to provide 274 No. long-term spaces and 130

No. short-term space, totalling to 404 No. spaces. Although the proposed bicycle parking is 28 No. spaces above the total minimum requirement, it is noted that the proposed long-term spaces is below the minimum requirement of the *Development Plan*.

As per the *Planning and Development Act, 2000* (as amended), Planning Authorities and An Bord Pleanála shall have regard to Ministerial Guidelines and shall apply any Specific Planning Policy Requirements of the Guidelines in the performance of their functions⁹. As such, in assessing the minimum number of cycle parking spaces to be provided for the proposed development, **SPPR 4 of the Compact Settlement Guidelines relating to minimum standards takes precedence over those set out in Table 14.17 of the Development Plan.**

Therefore, the proposed 404 No. cycle parking spaces (274 No. long-term and 130 No. short-term spaces) is wholly in accordance with SPPR 4 of the *Compact Settlement Guidelines*, as detailed previously in Section 5.8.4 above. Furthermore, we note that there will be 108 No. additional storage lockers provided for the development, which will provide residents with the option to store foldable bicycles, bicycle equipment or helmets.

7.3.6 Motorcycle Parking

The motorcycle parking standard is set by Section 14.17.9 of the *Development Plan*:

"Parking spaces should be provided on the basis of one motorcycle parking bay per 10 car parking spaces provided for non-residential developments and apartment developments. Spaces should be provided in locations convenient to building access points, similar to cycle parking requirements."

Based on the car parking spaces proposed and the above standard, the motorcycle parking requirement is 2 No. spaces. The proposed development provides 2 No. motorcycle parking spaces located to the north-west of the car parking area, and is therefore in accordance with Section 14.17.9 of the *Development Plan*.

7.4 Response to Other Relevant Policies / Objectives / Sections of the *Fingal Development Plan 2023-2029*

The following Sub-Sections sets out the relevant Policies, Objectives and Sections of the *Development Plan* and how the proposed development accords with such.

⁹ Section 28 (1C) of the *Planning and Development Act, 2000* (as amended).

7.4.1 Chapter 1: Introduction, Vision and Strategic Overview

Objective No.	Vision / Objective	Comment
Strategic Objective 2	<i>Continue the development of a network of well-served, well-connected, sustainable neighbourhoods which have a range of facilities, a choice of tenure and universally designed adaptable house types, promote social inclusion and integration of all minority communities.</i>	The development provides a range of apartment types, which are all accessible and 11% are designed to Universal Design standards. The apartments improve the mix of housing type and tenure within the surrounding predominantly 3-and-4-bed housing stock. The development is integrated into its context, providing overlooked new pedestrian links, connectivity to an adjoining public park to the west of the site and providing new public amenity facilities for the wider community. The quantum of public and communal open space and the numerous linkages proposed throughout the site will increase social interaction and inclusion amongst future residents of the development and wider community.
Strategic Objective 3	<i>Ensure new residential development is of the highest quality, endorsing the principles of healthy placemaking, enabling life cycle choices and physical, community, recreation and amenity infrastructure are provided in tandem, to create sustainable, healthy, inclusive and resilient communities.</i>	The proposed apartments have been designed to the highest quality, with very good daylighting experienced and low energy demand generated. A variety of bicycle parking and car sharing facilities provide more flexible and healthy transportation options in this accessible location. The proposed communal and public open space will also encourage future residents and the wider community to exercise and socialise with one another.
Strategic Objective 5	<i>Protect the unique character of Fingal. Support and facilitate revitalisation and consolidation of our towns, urban and rural villages and neighbourhoods, through placemaking and public realm initiatives, which encompasses a multi-faceted approach to planning, design and management.</i>	The subject proposal will prevent urban sprawl through the development of a highly accessible, underutilised, corner infill site. The subject site is sequentially suitable to provide residential development due to its location in the built-up area. The subject site is located closer to Swords Town Centre, existing and future public transport options, and

		<p>services and facilities than other developments nearby, such as the Waterside estate to the south-east of the site.</p> <p>The development provides a landmarking opportunity on the approach to Swords, of appropriate scale and character. Furthermore, it provides a living edge to the southern tip of the Metro and Rail Economic Corridor zoning, in the form of a primarily residential development with large public open space.</p>
Strategic Objective 7	<p><i>Ensure the highest quality of public realm and urban design principles are applied to all new developments, ensuring developments contribute to a positive sense of place and local distinctiveness of an area and facilitate the universal design approach into all developments.</i></p>	<p>As demonstrated in Section 4.0 of the accompanying Architectural Design Statement, the design rationale for the proposed development accords with each of the 12 No. criteria from the Best Practice Urban Design Manual.</p> <p>The proposed public open space and pedestrian and cyclist linkages throughout the site will contribute to a sense of place and connectiveness, whilst the proposed apartment building will provide an active living edge on approach to Swords for suitable placemaking and wayfinding.</p> <p>The proposed development has been designed to universal design standards to ensure inclusivity and convenient mobility.</p>
Strategic Objective 9	<p><i>Reduce car dependency and promote and facilitate sustainable modes of transport. Prioritise walking, cycling and public transport, while supporting an efficient and effective transport system.</i></p>	<p>The proposed development includes a number of measures to prioritise sustainable travel including a notably reduced car parking provision, extensive cycle parking provision and additional measures included in the accompanying Mobility Management Plan. Additional measures to benefit the wider community include an enhanced footpath and cycle lane along the southern, eastern and northern boundary as per the Cycle Design Manual.</p>

Strategic Objective 10	<i>Protect, enhance and ensure the sustainable use of Fingal's key infrastructure, including water supplies and wastewater treatment facilities, energy supply including renewables, broadband and transportation.</i>	<p>A Confirmation of Feasibility has been received from Uisce Eireann confirming that there is capacity to cater for the proposed development in both wastewater and watermain infrastructure. A comprehensive, nature based, and above ground surface water management strategy has been developed for the site to both improve quality of surface water discharge and reduce the flow rate in accordance with the <i>Development Plan</i> objectives.</p> <p>The focus on sustainable transport is addressed in response to Strategic Objective 9 earlier.</p>
Strategic Objective 11	<i>Protect, enhance and connect areas of natural heritage, green infrastructure and open space for the benefits of quality of life, biodiversity, protected species and habitats, while having the potential to facilitate climate change adaptation and flood risk measures.</i>	<p>The proposed development protects the belt of existing trees on the western boundary of the site and incorporates this into a network of open spaces which also incorporates new linkages for pedestrian and cyclists, therefore improving permeability in the local area. The development incorporates nature-based solutions to attenuate and store stormwater including an open detention basin that also serves as a usable kickabout space.</p>

7.4.2 Chapter 2: Planning for Growth – Core Strategy and Settlement Strategy

Policy / Objective No.	Policy / Objective	Comment
Policy CSP ₁ – Core Strategy	<i>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.</i>	<p>The settlement hierarchy for Fingal has been developed in accordance with the guiding principles established under the <i>NPF</i> and <i>RSES</i>, whereby the Fingal Settlement Hierarchy identifies Swords as a 'Key Town'. The <i>Development Plan</i> highlights the vital role Swords plays in the economic success of the country due to its strategic location along important transport links, the vast quantum of employment centres available, and its location within the Dublin Metropolitan</p>

		<p>Area (as per the Metropolitan Area Strategic Plan in the <i>RSES</i>).</p> <p>The delivery of much needed housing in Swords is vital to ensure the ongoing growth of the town and to provide 30% of future residential units to be within the Metropolitan Area. As such, the proposed development accords with the Fingal Settlement Strategy through the provision of much needed residential development on an underutilised, infill site within the built-up area of Swords.</p>
Policy CSP ₂ – Compact Growth and Regeneration	<i>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.</i>	Please see Section 5.2 and 6.1 of this Planning Report for details on how the proposed development accords with the principles of compact growth set out in the <i>NPF</i> and <i>RSES</i> .
Policy CSP ₄ – Sequential Development	<i>Promote the sequential development of serviceable lands in accordance with the tiered approach to land zoning outlined in the NPF, the RSES and MASP and ensure co-ordination with other neighbouring planning authorities where strategic development corridors traverse county boundaries.</i>	Please see Section 5.2 and 6.1 of this Planning Report for details on how the proposed development accords with the principles of the <i>NPF</i> and <i>RSES</i> (including the <i>MASP</i>) in terms of the sequential appropriateness of this suitably zoned site to provide residential units.
Objective CSO ₃ – Delivery of Housing Units	<i>Provide for flexibility in achieving the housing supply targets and meeting housing demand, the Council will consider the re-distribution of housing and population figures within each settlement. In this regard, where a site greater than 0.25ha has the potential to exceed the allocation for a particular settlement as set out under Table 2.14, the applicant must demonstrate to the Planning Authority that the necessary social and physical infrastructure {including active travel infrastructure, accessibility to both current and planned public transport services} is</i>	As per Table 2.14 of the <i>Development Plan</i> , the Core Strategy identifies there is a projected housing demand of 3,285 No. units required in Swords to accommodate the increase in population up to 2029. The provision of 123 No. apartments, on a highly underutilised, infill site, will contribute positively to this housing demand.

	<i>in place or can be provided as part of the application to accommodate the proposed development. The Council will monitor the delivery of housing units to ensure general compliance with the Core Strategy and housing supply targets for the County and to inform the redistribution potential outlined above.</i>	
Policy CSP14 – Consolidation and Re-Intensification of Infill/ Brownfield Sites	<i>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.</i>	The proposed development will provide much needed housing on an infill site within the built-up area of Swords. Due to the proximate location of the subject site to Swords Town Centre and existing and planned high-quality public transport options (MetroLink at Swords Central Station), a high-density development of 141 dph is appropriate.
Policy CSP15 – Compact Growth and Regeneration	<i>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.</i>	Please refer to Section 5.2 and 6.1 of this Report for how the proposed development represents the principles of compact growth in accordance with the <i>National Planning Framework</i> and <i>Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019-2031</i>.
Policy CSP17 – Socially and Economically Balanced Sustainable Communities	<i>Foster the development of socially and economically balanced sustainable communities.</i>	The proposed development will introduce a new unit size to the local area, catering for younger couples looking to start off on the property ladder, older people looking to downsize, or smaller families looking for affordable housing options. Additionally, out of the 123 No. units proposed, 24 No. units are Part V and will be transferred to Fingal County Council for social housing. The proposed unit types and sizes, as well as the Part V provision, will encourage a socially balanced community in the local area. Furthermore, the proposed public open space has been designed to encourage socialisation amongst the local community by providing kickabout space, seating and play space that is accessible to all.

<p>Policy CSP18 – Promotion of Residential Development</p>	<p><i>Promote residential development addressing the current shortfall in housing provision and meeting target guidance figures, through a co-ordinated planned approach to developing appropriately zoned lands at key locations, including regeneration areas, and vacant and underutilised sites.</i></p>	<p>The proposed development will positively help in addressing the current housing crisis experienced across the country, whereby housing demand significantly outweighs housing supply. The subject site is appropriately zoned to facilitate residential development and will make use of a highly underutilised, infill site.</p>
<p>Objective CSO17 – Mixture of House Types</p>	<p><i>Promote high quality residential development which meets the needs of all stages of the life cycle through an appropriate mix of house type and local amenities.</i></p>	<p>The unit type in the surrounding area comprises houses, duplexes and apartments; therefore, the proposed 123 No. apartment units will add to the current mix of housing type in the area.</p>
<p>Objective CSO20 – Network of Pathways/Cycleways</p>	<p><i>Develop a comprehensive network of signed pedestrian and cycleways linking residential areas to one another, to the village centres, schools, recreational hubs and railway stations.</i></p>	<p>The development site includes upgrades to cycle and pedestrian infrastructure along the southern, eastern and northern boundary of the site as well as good permeability throughout for active modes of transport. This links well with the existing wider transport network, facilitating access to local services and amenities.</p>
<p>Policy CSP19 – Compact, Sequential and Sustainable Urban Growth</p>	<p><i>Promote compact, sequential and sustainable urban growth to realise targets of at least 50% of all new homes to be built, within or contiguous to the existing built-up area of Dublin city and suburbs and a target of at least 30% for other metropolitan settlements, with a focus on healthy placemaking and improved quality of life.</i></p>	<p>The subject site is located within the Dublin Metropolitan Area and is within the existing built-up area of Swords. The proposed development will contribute positively to the delivery of 30% of residential units within the Metropolitan Area through the densification of a sequentially appropriate site.</p> <p>Additionally, the proposed apartment building is concentrated in the southern portion of the site, providing an active living edge on approach to Swords for healthy placemaking and wayfinding.</p>

<p>Objective CSO21 – Promotion of Higher Densities</p>	<p><i>Promote higher densities (50+ units per hectare) at appropriate locations in urban built up areas subject to meeting qualitative standards at appropriate locations with particular reference to urban centres and/or in proximity to high-capacity public transport nodes while demonstrating compliance with all relevant Section 28 Ministerial Guidelines.</i></p>	<p>The proposed density of 141 dph is wholly appropriate for the subject site given its highly accessible location. As discussed in greater detail in Section 5.8 of this Report, the proposed density accords with the density parameters for the site set out in the <i>Compact Settlement Guidelines</i>.</p>
<p>Objective CSO28 – Improved Sense of Identity</p>	<p><i>Develop enhanced community identities throughout Fingal through the improvement of social, cultural, community and residential amenities. Support the development of an improved sense of identity for the areas within Dublin City and Suburbs, including improvements to signage, landscaping and physical appearance and through the promotion of mixed uses, including residential, in our urban villages.</i></p>	<p>Currently the subject site offers little, if any, benefits to the amenity or physical appearance of the area. The development will enhance the visual amenity of the streetscape through the provision of additional landscaping and a high-quality designed apartment building, as well as provide a large quantum of public open space for the wider community to utilise. The proposed pedestrian and cyclist linkages and routes through and around the site will significantly improve permeability and wayfinding in the local area.</p>
<p>Objective CSO30 – Intensive Population and Employment Uses</p>	<p><i>The Plan will promote more intensive population and employment uses focussing on good community, civic and school facilities, good quality streets and spaces whereby existing and new neighbourhoods are knitted together alongside essential infrastructure and amenities that are required to develop sustainable communities and employment within the key urban centres, consistent with RPO 4.3.</i></p>	<p>As mentioned above, the proposed pedestrian and cycle linkages and routes will ensure the wider community is provided with connections to existing and proposed public open spaces and employment opportunities (Swords Business Park). As demonstrated in the accompanying <i>Childcare Demand Assessment, School Demand Assessment and Social Infrastructure Audit</i>, it is anticipated that the proposed development will not put any pressure on existing services and facilities.</p> <p>In this regard, the proposed development will provide much needed housing and ensure the wider community is supported with necessary amenity (public open space and permeable connections) and essential infrastructure (pedestrian footpath and cycle lane around the site), whilst</p>

		not negatively impacting the existing facilities and services nearby.
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7.4.3 Chapter 3: Sustainable Placemaking and Quality Homes

Policy / Objective No.	Policy / Objective	Comment
Policy SPQHP1 – Healthy Placemaking	<i>The Council will support the development and creation throughout Fingal of successful and sustainable settlements which endorse the principles of healthy placemaking and which through a multi-faceted approach to planning, design and management continue to ensure the development of attractive high-quality places to live, work, recreate, visit and invest in, served by a range of local services, provision of quality public realms, diverse and accessible community facilities for all genders, non-binary or none and open spaces for the benefit of the community.</i>	<p>The site of the proposed development is located on the confluence of the predominate commercial zoning, the adjacent residential character, adjoining public park and a nodal position on the approach to Swords. The proposed design includes predominately housing to provide an active/living development to landmark this location and unify the confluence of uses nearby and complete the urban edge with homes.</p> <p>Future residents will have the benefit of being located in close proximity to existing and future transport options for travelling to work, education or leisure. Furthermore, the subject site is located in close proximity (c. 950 metres) to Swords Town Centre where an abundance of services, facilities and work opportunities are available. The proximity of the site to the adjoining Swords Business Park to the north will also provide job opportunities for future residents, without requiring people to travel far.</p> <p>The proposed public open space and permeable connections will benefit both future residents the wider community by providing accessible routes through and around the site and provide a safe space for people to socialise and children to play.</p>

<p>Policy SPQHP2 – Balanced Sustainable Communities</p>	<p><i>Foster the development of socially and economically balanced sustainable communities.</i></p>	<p>The proposed development will introduce a new unit size to the local area, catering for younger couples looking to start off on the property ladder, older people looking to downsize, or smaller families looking for affordable housing options. Additionally, out of the 123 No. units proposed, 24 No. units are Part V and will be transferred to Fingal County Council for social housing. The proposed unit types and sizes, as well as the Part V provision, will encourage a socially balanced community in the local area.</p> <p>Furthermore, the proposed public open space has been designed to encourage socialisation amongst the local community by providing kickabout space, seating and play space that is accessible to all.</p>
<p>Objective SPQHO1 – Sustainable Communities</p>	<p><i>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).</i></p>	<p>As per the response above, the proposed development seeks to encourage socialisation and integration between different ages and economic backgrounds. As demonstrated in Section 5.8 and 5.9 of this Report, the proposed development accords with the <i>Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (January 2024)</i> (replaces the <i>Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009</i>) and the <i>Design Manual for Urban Roads and Streets (2019)</i>.</p>
<p>Objective SPQHO2 – Key Principles</p>	<p><i>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:</i></p> <ul style="list-style-type: none"> <i>Demonstrates compliance with the Guiding Principles for the creation of healthy and attractive places as set out in Healthy</i> 	<p>The proposed public open space and pedestrian and cyclist linkages throughout the site will contribute to a sense of place and connectiveness, whilst the proposed apartment building will provide an active living edge on approach to Swords for suitable placemaking and wayfinding.</p> <p>The proposed development has been designed to universal design standards to ensure inclusivity and convenient mobility.</p>

	<p><i>Placemaking, Regional Spatial and Economic Strategy (RSES) 2019–2031.</i></p> <ul style="list-style-type: none"> <i>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.</i> <i>Is inclusive of all members of society, all genders, non-binary or none, irrespective of age, or levels of mobility.</i> <i>Advocates a universal design approach and is socially inclusive.</i> <i>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.</i> <i>Encourages the development of car free neighbourhoods and streets, where appropriate.</i> <i>Contributes to our climate goals.</i> 	<p>The proposed development seeks to reduce car usage through the provision of 404 No. cycle parking spaces (274 No. long-term spaces and 130 No. short-term space) and the numerous pedestrian and cycle routes and linkages through and around the site to promote more active modes of travel. The location of the subject site also benefits from existing bus services along the R106 as well as the future Metro Swords Central Station only c. 800 metres south-west of the site.</p> <p>A Climate Action Energy Statement Report has been prepared by J.V. Tierney & Co which details the strategy to address various climate mitigation actions in the built environment. Green roofs and SuDS infrastructure have also been included within the design of the subject scheme to achieve a high energy rating and compliance with building standards.</p>
<p>Policy SPQHP₅ – Quality Placemaking</p>	<p><i>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.</i></p>	<p>Please refer to the responses given to Policy SPQHP₁ above.</p>
<p>Objective SPQHO₆ – Universal Design Approach</p>	<p><i>Promote and facilitate a Universal Design for all developments.</i></p>	<p>All apartments are designed to be accessible in compliance with Part M of the building regulations, furthermore 11% of apartments are designed to Universal Design standard.</p>

		Proposed routes through the site are generally flat and smooth surfaced so that wheelchair users or people who are less abled are able to move freely in the site.
Policy SPQHP10 – Support Compact Growth	<i>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 RSES.</i>	Please refer to Section 5.2 and 6.1 of this Report for how the proposed development represents the principles of compact growth in accordance with the <i>National Planning Framework</i> and <i>Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019-2031</i> .
Objective SPQHO9 – Consolidated Residential Development	<i>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.</i>	The subject site is located in the existing built-up area of Swords, with Swords Business Park to the north, residential dwellings to the west, south and south-east, and Applegreen Service Station to the east. The subject proposal will represent the suitable development of a sequentially appropriate site that is located closer to the town centre and to high-quality public transport options than other existing development (Waterside estate to the south-east).
Objective SPQHO10 – New Residential Development	<i>Focus new residential development on appropriately zoned lands within the County, within appropriate locations proximate to existing settlement centres where infrastructural capacity is readily available, and along existing or proposed high quality public transport corridors and active travel infrastructure in a phased manner, alongside the delivery of appropriate physical and social infrastructure. Active travel options should also be considered while liaising with the National Transport Authority and Transport Infrastructure Ireland to ensure public transport options to and from new developments to local amenities such as shops and libraries.</i>	As demonstrated in the Response to Fingal County Council's Opinion, the subject site is appropriately zoned to cater for residential development. The subject site is located only c. 950 metres walking distance to Swords Main Street and c. 650 metres from the 'Major Town Centre' zoning (according to Map Sheet No. 8 of the <i>Development Plan</i>), ensuring future residents are catered for with services and facilities nearby. The proximate location of the subject site to the planned Metro Swords Central Station will also provide future residents with sustainable public transport options to travel to work, education or leisure. The proposed pedestrian and cycle linkages and routes through and around the site will significantly improve

		<p>permeability and connectivity in the area. The proposed pedestrian footpath and cycle lane along the southern, eastern and northern boundary will provide the necessary infrastructure for promoting increased levels of active travel.</p>
<p>Objective SPQHO11 – Housing Need</p>	<p><i>Ensure that adequate and appropriate housing is available to meet the needs of people of all incomes and needs including marginalised groups within our communities, including but not limited to, Traveller households, older persons, people with disabilities, and the homeless, through an appropriate mix of unit types, typologies and tenures provided in appropriate locations and in a manner appropriate to specific needs.</i></p>	<p>The proposed unit typology and sizes will cater for younger couples looking for an affordable housing option to start off on the property ladder, older couples looking to downsize, and smaller families seeking affordable housing.</p> <p>Out of the 123 No. units proposed, 11% of units will cater for people who are less able, in accordance with Universal Design standards.</p> <p>Out of the 123 No. units proposed, 24 No. units will be transferred to Fingal County Council for social housing, in accordance with the Part V provision.</p> <p>As such, the proposed mix of unit sizes and tenures ensures there is a variety of options available to people of various ages, background and stages at life.</p>
<p>Objective SPQHO12 – Fingal Settlement Strategy</p>	<p><i>Ensure that all proposals for residential development accord with the Fingal Settlement Strategy and are consistent with Fingal’s identified hierarchy of settlement centres.</i></p>	<p>The settlement hierarchy for Fingal has been developed in accordance with the guiding principles established under the <i>NPF</i> and <i>RSES</i>, whereby the Fingal Settlement Hierarchy identifies Swords as a ‘Key Town’. The <i>Development Plan</i> highlights the vital role Swords plays in the economic success of the country due to its strategic location along important transport links, the vast quantum of employment centres available, and its location within the Dublin Metropolitan Area (as per the Metropolitan Area Strategic Plan in the <i>RSES</i>).</p>

		<p>The delivery of much needed housing in Swords is vital to ensure the ongoing growth of the town and to provide 30% of future residential units to be within the Metropolitan Area. As such, the proposed development accords with the Fingal Settlement Strategy through the provision of much needed residential development on an underutilised, infill site within the built-up area of Swords.</p>
<p>Policy SPQHP12 – Active Travel Links</p>	<p><i>Ensure that all necessary active travel links to access public transport, schools, amenities and neighbouring communities from new or expanded residential developments to be available where possible before the first housing units are occupied, whether the infrastructure is being provided by the Council or by a private developer.</i></p>	<p>Please refer to the response provided to Objective CSO2o.</p>
<p>Policy SPQHP16 – Accessibility for All</p>	<p><i>Promote the development of built environments and public realms which are accessible to all, ensuring new developments accord with the seven principles of Universal Design as advocated by the National Disability Authority, Building for Everyone: A Universal Design Approach, and to consider the appointment of a dedicated Access Officer to coordinate disability issues across departments to include liaising with planning and strategic infrastructure departments.</i></p>	<p>The public and communal open spaces within the development and its associated path network adheres to the requirements for Universal Access in accordance with <i>Building for Everyone: A Universal Design Approach</i>.</p> <p>All apartments are designed to be accessible in compliance with Part M of the building regulations, furthermore 11% of apartments are designed to Universal Design standard.</p>
<p>Policy SPQHP19 – National and Regional Policy on Social Inclusion</p>	<p><i>Support and promote social inclusion in line with national and regional policy.</i></p>	<p>The public open space will be accessible to all members of the public. The space will incorporate a range of functions including informal nature-based play for young children, a kickabout space, and seating to promote socialisation and interaction, particularly amongst younger children playing.</p> <p>The proposed residential development includes 24 No. Part V units to be transferred to Fingal County Council for social</p>

		housing which will people from different backgrounds are accommodated with suitable housing in the community.
Policy SPQHP20 – Adaptable and Flexible Housing	<i>Promote all new housing to be designed and laid out in an adaptable and flexible manner to meet the needs of the homeowner as they age as set out in Section 5.2 Flexibility and Adaptability Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities 2007 published by the Department of Environment, Heritage and Local Government.</i>	All apartments are designed to be efficient and well laid out in line with design exemplars in the <i>Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities (2007)</i> published by the Department of Housing Local Government and Heritage. The apartments are universally accessed by two main shared stairs and lifts providing flexibility of approach and resilience in case of one lift being out of operation. All apartments can access the central landscaped courtyard, either directly or via communal stairs.
Objective SPQHO18 – Age Friendly Principles	<i>Support the needs of older people within the community with reference to Housing, Mobility and Public Realm having regard to Age Friendly Principles and Guidelines for the Planning Authority 2021 and the Fingal Age Friendly Strategy 2018–2023.</i>	The path network through the open spaces has been designed to Universal Access Standards and thus will be Age Friendly. Seating has been provided at regular intervals to provide people with places to rest. Seating will incorporate back rests and arm rests for comfortability. The provision of generous 1-and-2-bed apartments may also facilitate older people looking to downsize.
Policy SPQHP22 – Housing for People with Disabilities	<i>Support and promote access, for people with disabilities, to the appropriate range of housing and related support services, delivered in an integrated and sustainable manner, which promotes equality of opportunity, individual choice and independent living.</i>	As above, 11% of the apartments are designed to Universal Design standards and provide greater opportunity for housing for persons with disabilities or people who are less mobile. The secure central courtyard provides a fully accessible amenity space also.
Policy SPQHP23 – Affordable, Social and Specialised Housing	<i>Promote the provision of affordable and social housing and specialised housing including sheltered housing and housing for persons with disabilities.</i>	The proposed development seeks to provide 24 No. Part V units that will be handed over to Fingal County Council as affordable / social housing.

<p>Objective SPQHO22 – Accessible Housing</p>	<p><i>Fingal County Council recognises the importance of social inclusion and aims to make 30% of social housing should be fully accessible and built with a universal design approach which will mean that the property will be flexible and changed as needed over the course of the occupants lifetime.</i></p>	<p>Some 100% of the apartments are accessible in compliance with Part M and 11 % are designed to the enhanced Universal Design standard.</p>
<p>Policy SPQHP30 – Social, Affordable and Cost Rental Housing</p>	<p><i>Promote the provision of social, affordable and cost rental housing in accordance with the Fingal County Council Housing Strategy, Part V of the Planning and Development Act 2000, (as amended) by the Affordable Housing Act 2021 and government policy as outlined by the Department of Housing Local Government and Heritage Housing for All – A new Housing Plan for Ireland to 2030.</i></p>	<p>As mentioned above, the proposed development will provide 24 No. Part V units that will be handed over to Fingal County Council as affordable / social housing. All apartments are designed to be suitable for the cost rental model.</p>
<p>Policy SPQHP35 – Quality of Residential Development</p>	<p><i>Promote a high quality of design and layout in new residential developments at appropriate densities across Fingal, ensuring high-quality living environments for all residents in terms of the standard of individual dwelling units and the overall layout and appearance of developments. Residential developments must accord with the standards set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG 2009 and the accompanying Urban Design Manual – A Best Practice Guide and the Sustainable Urban Housing; Design Standards for New Apartments (DHLGH as updated 2020) and the policies and objectives contained within the Urban Development and Building Heights Guidelines (December, 2018). Developments should be consistent with standards outlined in Chapter 14 Development Management Standards.</i></p>	<p>Please see Section 5.0 of this Planning Report for details on how the proposed development accords with the national guidelines and documents mentioned in Policy SPQHP35.</p> <p>Please refer to the response given to the standards outlined in Chapter 14 below.</p>

<p>Objective SPQHO31 – Variety of Housing Types</p>	<p><i>Encourage the creation of attractive, mixed use and sustainable residential communities which contain a wide variety of housing and apartment types, sizes, tenures and typologies in accordance with the Fingal Housing Strategy, the HNDA with supporting community facilities, amenities and services.</i></p>	<p>The area surrounding the subject site is mixed-use in nature, with residential development predominantly to the west and south, a public park directly adjoining the site to the west, Applegreen service station to the east and Swords Business Park to the north. The proposed residential development with a large quantum of public open space and public linkages will contribute positively to the mixed-use character of the area.</p> <p>The proposed unit mix of 1-and-2-bed apartment unit will contribute positively to the unit type and mix present in the surrounding area. As demonstrated in the <i>Response to Fingal County Council's Opinion</i>, there is a current undersupply of smaller units in both Swords Town and Fingal itself. The unit type in the surrounding area comprises houses, duplexes and apartments; therefore, the proposed 123 No. apartment units will add to the current mix of housing type in the area.</p> <p>The residents of the proposed development will benefit from 1,011 sq m of communal amenity space, including 932 sq m of external space and 79 sq m of internal space. These spaces will encourage socialisation amongst residents, provide space for children to play, and will provide visual amenity through the proposed landscaping in the courtyard area.</p> <p>The 1,142 sq m of public open space will provide the wider community with seating areas, play spaces, and kickabout space, which will increase social interaction and promote physical exercise. The proposed 589 sq m of environmental open space along the western boundary of the site will</p>
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		provide significant biodiversity benefits as well as provide visual amenity for people passing by.
Objective SPQHO32 – Property Management	<i>Promote efficient and effective property management to ensure the satisfactory security, maintenance and upkeep of communal areas.</i>	The design specifically considers security and ease of maintenance with clearly defined delineation of public and private areas. All communal areas are well defined in the horizontal and vertical circulation and enclosed landscaped courtyard.
Objective SPQHO33 – New Residential Development and Energy Efficiency	<i>Ensure new residential development incorporates energy efficiency measures and promotes innovative renewable energy opportunities, for example by passive solar design, natural ventilation, and vegetation (green roofs etc) on buildings and makes most effective and sustainable use of water, aggregates and other resources.</i>	The proposed development will be designed to fully comply with Technical Guidance Document Part L to ensure it meets the energy, carbon and renewable energy targets required. These targets will be achieved through energy efficient measures for passive, active and renewable energy.
Objective SPQHO34 – Integration of Residential Development	<i>Encourage higher residential densities where appropriate ensuring proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area with a target minimum amount of 15% (except in cases where the developer can demonstrate that this is not possible, in which case the 12% to 15% range will apply) amount of green space, tree coverage and public space associated with every residential area.</i>	<p>The proposed development achieves an appropriate density for the site at 141 dph, given its highly accessible location to the planned Metro Swords Central Station (c. 800-metres / 10-minute walking distance), Swords Town Centre (c. 950 metre / 12-minute walking distance), and existing bus stops along the R106 within 60-metres of the site.</p> <p>Public open space totalling to 13% of the site area (1,142 sq m) is provided in the northern portion of the site, as well as 589 sq m of environmental open space along the western boundary (not included in the public open space calculation), totalling to 1,731 sq m / 19.8% of the site area. These spaces will provide both visual amenity and space for socialisation and physical exercise.</p>

<p>Policy SPQHP36 – Private and Semi-Private Open Space</p>	<p><i>Ensure that all residential development within Fingal is provided with and has access to high quality private open space and semi-private open space (relative to the composition of the residential scheme) which is of a high-quality design and finish and integrated into the design of the residential development.</i></p>	<p>The proposed development provides all apartment units with private open space in the form of balconies and terraces, all of which are accessed via the main living area of the apartment and have a minimum depth of 1.5 metres. The private amenity space for the 1-bed units range in size between 5.3 sq m and 14.2 sq m, between 6 sq m and 7 sq m for the 2-bed (3-person) units, and between 7 sq m and 10.3 sq m for the 2-bed (4-person) units..</p> <p>The proposed development will also include 79 sq m of internal communal amenity space and 932 sq m of external communal amenity space. The external communal space is located in the centre of the courtyard-style building and along the southern boundary of the site. The courtyard comprises 650 sq m of communal space and will provide play space, a social hub, and extensive landscaped area for residents of the proposed development to enjoy. The communal space along the southern boundary of the site will provide 282 sq m of green space, seating and sensory planting.</p>
<p>Policy SPQHP37 – Open Space Hierarchy</p>	<p><i>Ensure that all residential development in Fingal is served by a clear hierarchy and network of high quality public open spaces providing for active and passive recreation purposes which is easily accessible and integrated with local communities.</i></p>	<p>The public open space is easily identifiable, on the confluence of public pedestrian and cycle routes. Due to the numerous linkages and routes proposed throughout the site, particularly the route through the public open space to the north, the extent of pedestrian and cyclist movement will ensure a high-level of passive surveillance on the public open space. Additionally, the distance of the apartment building to the public open space will ensure there will be 'eyes-on-the-street' for the safety of residents and the wider community.</p>

<p>Objective SPQHO35 – Private Open Space</p>	<p><i>Require that all private open spaces for houses and apartments/duplexes including balconies, patios, roof gardens and rear gardens are designed in accordance with the qualitative and quantitative standards set out set out in Chapter 14 Development Management Standards.</i></p>	<p>All apartments have private open space provided by balconies to upper levels or ground terraces at ground floor. Generally, they are orientated east, south or west. A small number have a northern aspect but overlook public open space. These apartments also have a seating area on a generous south facing deck overlooking the internal courtyard.</p>
<p>Objective SPQHO36 – Public Open Space</p>	<p><i>Public open space provision in new residential developments must comply with the quantitative and qualitative standards set out in Chapter 14 Development Management Standards.</i></p>	<p>Public open space provision within the development meets with the quantitative and qualitative standards set out in Chapter 14 of the <i>Development Plan</i>. Please see the <i>Architectural Design Statement</i> and <i>Landscape Report</i> submitted herewith for further details.</p>
<p>Policy SPQHP38 – Compact Growth, Consolidation and Regeneration</p>	<p><i>Promote compact growth in line with the NPF and RSES through the inclusion of specific policies and targeted and measurable implementation measures that:</i></p> <ul style="list-style-type: none"> • <i>Encourage infill/brownfield development</i> • <i>Focus growth on the County’s designated strategic development areas identified in the Metropolitan Area Strategic Plan</i> • <i>Promote increased densities along public transport corridors.</i> 	<p>The development of the corner infill site, surrounded by residential and commercial uses, will enhance the visual amenity of the streetscape and provide a large quantum of public open space for the wider community to utilise.</p> <p>As demonstrated in Section 5.8 of this Report, according to Appendix E of the <i>Regional Spatial & Economic Strategy</i> by the Eastern & Midland Regional Assembly, the subject site is located within the Dublin Metropolitan Area, (subject site falls within the Electoral Division of Swords - Seatown). In accordance with the <i>Compact Settlement Guidelines</i>, as the site is located in the Dublin Metropolitan Area, as well as the definition of the subject site as a ‘High Capacity Public Transport Node or Interchange’ defined under Table 3.8 of the <i>Compact Settlement Guidelines</i>, the site can be classified as a ‘Metropolitan Towns (>1,500 population) - Centre and Urban Neighbourhoods’ where densities of 50–150 dwellings per hectare (‘dph’) shall generally be applied in the centres and in urban neighbourhoods of Metropolitan</p>

		Towns. The proposed scheme promotes compact growth by providing a high-density residential development of 141 dph.
Objective SPQHO37 – Residential Consolidation and Sustainable Intensification	<i>Promote residential consolidation and sustainable intensification at appropriate locations, through the consolidation and rejuvenation of infill/brown-field development opportunities in line with the principles of compact growth and consolidation to meet the future housing needs of Fingal.</i>	The development will contribute towards reducing the rate of urban sprawl by developing an underutilised, infill corner site located in a highly accessible and built-up location.
Objective SPQHO38 – Residential Development at Sustainable Densities	<i>Promote residential development at sustainable densities throughout Fingal in accordance with the Core Strategy, particularly on vacant and/or under-utilised sites having regard to the need to ensure high standards of urban design, architectural quality and integration with the character of the surrounding area.</i>	As per Table 2.14 of the <i>Development Plan</i>, the Core Strategy identifies there is a projected housing demand of 3,285 No. units required in Swords to accommodate the increase in population up to 2029. The provision of 123 No. apartments will contribute positively to this housing requirement and will provide such housing on an underutilised, infill site. The design and layout of the development is such that it will not impact the character or amenity of the local area, as demonstrated in the accompanying <i>Landscape & Visual Impact Assessment</i>.
Objective SPQHO39 – New Infill Development	<i>New infill development shall respect the height and massing of existing residential units. Infill development shall retain the physical character of the area including features such as boundary walls, pillars, gates/gateways, trees, landscaping, and fencing or railings.</i>	The prevailing heights in the vicinity of the site generally range between 2 No. and 4 No. storeys. These buildings were constructed many years ago; at a time where compact growth and high-density development was less fundamental to delivering housing units compared to current times. It is our professional opinion that the proposed scheme will successfully assimilate into the surrounding context, by sustainably densifying the subject site through the provision of high-density housing on underutilised lands, contributing positively towards addressing the national housing crisis.

		<p>The existing boundary of the site comprises a continuous hedgerow and trees along the western boundary with timber posts, mesh fencing and a guardrail along the remaining boundary. To facilitate an improved streetscape and permeable connections into the site, it is proposed to remove majority of the site’s existing boundary treatment, except for the western boundary where it will be retained and enhanced through a significant increase in planting and a new connection into the existing public park to the west of the site.</p>
<p>Objective SPQHO4₂ – Development of Underutilised Infill, Corner and Backland Sites</p>	<p><i>Encourage and promote the development of underutilised infill, corner and backland sites in existing residential areas subject to the character of the area and environment being protected.</i></p>	<p>The character of the surrounding area is mixed-use, with residential estates primarily to the south-east, south and west of the site, and commercial, industrial, office and retail to the north and east. The construction of a residential development on a highly underutilised, corner infill site will not detract from the character of the area and instead, will contribute positively to the provision of additional housing unit sizes for the area (1-and-2-bed units).</p> <p>The surrounding character of the area has been protected by setting back the proposed building from the western boundary to allow for the retention and protection of the existing tree belt. The open spaces within the development will be finished to a high standard with extensive tree, hedging and groundcover planting to the interface with the existing street network; protecting and enhancing the character of the urban environment.</p> <p><i>A Landscape & Visual Impact Assessment</i> is submitted herewith which assesses the impact of the proposed development on the existing landscape and visual amenity of the subject site and concluded the following:</p>

		<p><i>“The overall sensitivity of the site is low, with a medium landscape value and high capacity for change. The ‘Quality of Impact’ of the proposed development is determined to be neutral in six of the nine representative viewpoints; and neutral to positive in three of the viewpoints. The ‘Significance of Impact’ ranges between ‘Not Significant’ to ‘Moderate’ through viewpoints one to nine. It is therefore determined that the proposed development will not have a significant impact on the existing landscape or visual amenity of the subject site.”</i></p>
Objective SPQHO ₄₃ – Contemporary and Innovative Solutions Design	<i>Promote the use of contemporary and innovative design solutions subject to design respecting the character and architectural heritage of the area.</i>	<p>The architectural design of the scheme is characterised by a consistent and contemporary expression, creating a cohesive identity while preserving the simplicity of the elevations. This approach ensures uniformity across the development, giving it a distinct and recognisable aesthetic.</p> <p>As demonstrated in the <i>Landscape & Visual Impact Assessment</i>, there will be no <i>“significant impact on the existing landscape or visual amenity of the subject site”</i>. It is also noted that the surrounding area contains no architectural heritage.</p>

7.4.4 Chapter 4: Community Infrastructure and Open Space

Policy / Objective No.	Policy / Objective	Comment
Policy CIOSP ₂ – Community and Social Infrastructure Audits	<i>Promote the preparation of community and social infrastructure audits for large-scale developments which will inform policy on infrastructure provision within Fingal.</i>	A Social Infrastructure Audit has been prepared by Thornton O’Connor Town Planning and is submitted herewith.

<p>Objective CIO5 – Residential Developments and Community Facilities</p>	<p><i>Ensure proposals for large scale residential developments include a community facility, unless it can be established that the needs of the new residents can be adequately served within existing or committed community facilities in the area.</i></p>	<p>Please refer to the accompanying <i>Social Infrastructure Audit</i> prepared by Thornton O'Connor Town Planning for more details. The document concludes:</p> <p><i>"In our opinion, there is sufficient existing provision of social infrastructure in the vicinity of the subject site (i.e., within c. 1-2 km radius) to support the proposed development. As the above survey demonstrates, there is an adequate supply of education, healthcare, and community facilities within reasonable walking distance of the subject lands, as well as a number of parks and amenity areas, playing pitches and sporting facilities available to local residents. The area has a frequent public transport link to quickly connect the subject site directly to a wider range of facilities located in nearby Dublin City Centre. The proposed development will stitch into an already established neighbourhood with adequate local facilities.</i></p> <p><i>The survey identified a large range of community facilities within the Study Area. Some 41 No. social infrastructure facilities were identified as part of this Audit within a radius of 1 km of the subject site (30 No. excluding schools and childcare), with that figure increasing to 172 No. social infrastructure facilities located within 2 km of the subject site (135 No. excluding schools and childcare). The Study Area is particularly well served in terms of healthcare provision, faith infrastructure, and retailing amenities.</i></p> <p><i>Overall, healthcare, sports and recreation, community, education, and other facilities are all well-represented</i></p>
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		<p><i>within the area and cater for the existing and proposed new residential community. While a current shortage in childcare spaces was identified in the childcare survey, it is expected that the significant granted pipeline of new childcare facilities will address this shortfall into the future. The proposed development also includes passive and active open spaces as well as pedestrian links throughout the site. Having regard to the above we submit that the Swords area provides a wide range of existing social and community infrastructure to support the development and this is an ideal location for the residential scheme."</i></p>
<p>Policy CIOSP10 – Childcare Facilities</p>	<p><i>Support the provision of appropriate childcare facilities.</i></p>	<p>A Childcare Demand Assessment has been prepared by Thornton O'Connor Town Planning and is submitted herewith. The following provides the conclusion of the assessment:</p> <p><i>"In our opinion, there is sufficient existing provision of childcare infrastructure in the vicinity of the subject site (i.e., within c. 2 km radius) to support the proposed development. As the above survey demonstrates, there is an adequate supply of facilities within walking available to local residents offering a higher-than-average per capita ratio of childcare places. While there was no material level of vacancy identified within existing childcare facilities <u>the size of the proposed development is unlikely to impact on the quality of services and facilities currently available in the locality.</u>" [Author's Emphasis]</i></p>
<p>Objective CIO28 – Childcare Facilities and New Development</p>	<p><i>Require the provision of appropriate childcare facilities as an essential part of new residential and mixed-use developments in accordance with the</i></p>	<p>Please see the response to Objective CIOSP10 above.</p>

	<p><i>provisions of the Childcare Facilities Guidelines for Planning Authorities 2001 or any superseding Guidelines, or as required by the Planning Authority. Such facilities should be provided in a timely manner and be an integral part of the development proposal.</i></p>	
<p>Policy CIOSP₁₃ – Open Space/Parks</p>	<p><i>Continue the development of a hierarchy of multifunctional active and passive recreational open spaces and facilities to serve all age cohorts.</i></p>	<p>The 1,142 sq m of public open space in the northern portion of the site will provide the wider community with socialisation space, somewhere to relax or exercise, and play space for children. This space is to cater for people of all ages and will be accessible for people with mobility issues.</p> <p>The public open space is easily identifiable, on the confluence of public pedestrian and cycle routes. Due to the numerous linkages and routes proposed throughout the site, particularly the route through the public open space to the north, the extent of pedestrian and cyclist movement will ensure a high-level of passive surveillance on the public open space. Additionally, the distance of the apartment building to the public open space will ensure there will be 'eyes-on-the-street' for the safety of residents and the wider community.</p> <p>The proposed 589 sq m of environmental open space along the western boundary of the site will provide significant biodiversity benefits as well as provide visual amenity for people passing by. As one of the proposed routes travels parallel to this open space, as well as its proximity to the proposed apartment building, the environmental open space will receive high levels of passive surveillance.</p>
<p>Objective CIOSO₃₆ – Variety of Open Space</p>	<p><i>Provide a wide variety of resiliently designed, sustainably managed and accessible public open spaces, including allotments, community gardens, parklands and sporting facilities, on a hierarchical</i></p>	<p>The proposed development will primarily provide public open space comprising kickabout space, play area and seating / relaxation space; however, there will also be environmental open space (not counted towards the public open space</p>

	<i>basis throughout the County in order to achieve a choice of open space facilities. Best practice Green Infrastructure Guidelines should be used to determine the location and type of open spaces to be provided.</i>	quantum) that will provide visual amenity for the wider public. All open spaces throughout the site incorporates many a high-quality landscape design, including native tree planting, pollinator friendly tree, shrub and groundcover planting, bulb planting and meadow grassland.
Objective CIO38 – Public Open Space Provision	<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>	Please see Section 7.3.3.1 of this Planning Report for compliance with Objective CIO38 (repeated as Objective DMSO51).
Objective CIO41 – Accessible and Safe Open Space	<i>Ensure public open space is accessible and safety is prioritised by incorporating passive surveillance.</i>	Please see the response to Objective CIO13 above.
Objective CIO44 – Playgrounds	<i>Facilitate the provision of appropriately scaled children’s playground facilities within new and existing residential development in line with the Council’s Play Policy.</i>	Please see the response to Objective DMSO68 for how the quantum and quality of play space accords with the requirements for residential development.
Objective CIO51 – Permeability	<i>Ensure permeability and connections between public open spaces including connections between new and existing spaces, in consultation with residents.</i>	The proposed pedestrian and cycle linkages and routes through and around the site will significantly improve permeability and connectivity in the area. In particular, the proposed connection into the existing public park to the west of the site will provide easy access for residents of the proposed development to this public park, as well as residents of Seamount View to easily access the proposed public open space.
Objective CIO52 – Trees	<i>Protect, preserve and ensure the effective management of trees and groups of trees.</i>	A total of 4 No. trees are to be removed on site to cater for the proposed drainage services, new pedestrian footpath and cycle lane, and fire tender circulation. There will be a significant

		<p>quantum of replacement trees and planting to ensure a greater range in biodiversity and visual amenity than what is currently provided. As stated in the accompanying <i>Arboricultural Assessment & Impact Report</i>:</p> <p><i>“A diverse range of tree species and cultivars are proposed within the landscape masterplan for the site. This will increase overall numbers of trees from current levels and provide a greater range of ecosystem services than currently provided by the existing tree population. In terms of mitigation it is considered that the proposed planting more than compensates for trees to be removed.”</i></p>
Objective CIO53 – Open Space and Privacy	<i>Ensure all areas of private open space have an adequate level of privacy for residents through the minimisation of overlooking and the provision of screening arrangements.</i>	The proposed ground floor terraces will be provided with a low-level hedge and railing to ensure the privacy of residents private amenity space is protected. For the units on the upper floor level, there will be screening provided between any adjoining balconies.

7.4.5 Chapter 5: Climate Action

Policy / Objective No.	Policy / Objective	Comment
Policy CAP ₁ – National Climate Action Policy	<i>Support the implementation of national objectives on climate change including the national Climate Action Plan 2023 (CAP₂₃), the National Adaptation Framework 2018 and the National Energy and Climate Plan for Ireland 2021–2030 and other relevant legislation, policy and agreements in relation to climate action.</i>	A <i>Climate Action Energy Statement Report</i> has been prepared by J.V. Tierney & Co and is submitted here within which demonstrates how the proposed development will support the implementation of CAP 23.

Objective CAO2 – Fingal County Council Climate Change Action Plan	<i>Implement Fingal County Council’s Climate Change Action Plan 2019–2024 in consultation and partnership with stakeholders including the Dublin Metropolitan Climate Action Regional Office (CARO) and Codema.</i>	A Climate Action Energy Statement Report has been prepared by J.V. Tierney & Co and is submitted here within which demonstrates how the proposed development will support the implementation of Fingal County Councils Climate Action Plan.
Policy CAP2 – Mitigation and Adaptation	<i>Prioritise measures to address climate change by way of both effective mitigation and adaptation responses in accordance with available guidance and best practice.</i>	A Climate Action Energy Statement Report has been prepared by J J.V. Tierney & Co and is submitted here within which demonstrates how the proposed development will support the implementation of Fingal County Councils Climate Action Plan.
Policy CAP5 – Climate Mitigation and Adaptation in the Built Environment	<i>Ensure the built environment is equipped for the impacts of climate change by supporting climate change mitigation and adaptation measures as part of new and existing developments.</i>	The proposed development will encompass openable windows to ensure overheating does not become an issue. This demonstration will be carried out through a TM59 Design methodology for the assessment of overheating risk in homes (2017) assessment.
Policy CAP10 – Climate Mitigation Actions in the Built Environment	<p><i>Promote low carbon development within the County which will seek to reduce carbon dioxide emissions and which will meet the highest feasible environmental standards during construction and occupation. New development should generally demonstrate/provide for:</i></p> <ul style="list-style-type: none"> <i>a. Building layout and design which maximises daylight, natural ventilation, active transport and public transport use;</i> <i>b. Sustainable building/services/site design to maximise energy efficiency;</i> <i>c. Sensitive energy efficiency improvements to existing buildings;</i> <i>d. Energy efficiency, energy conservation, and the increased use of renewable energy in existing and new developments;</i> 	A Climate Action Energy Statement Report has been prepared by J.V. Tierney & Co and is submitted here within which demonstrates how the proposed development achieves Carbon Performance Coefficient (CPC) in compliance with Part L of the building regulations.

	<ul style="list-style-type: none"> e. <i>On-site renewable energy infrastructure and renewable energy;</i> f. <i>Minimising the generation of site and construction waste and maximising reuse or recycling; and</i> g. <i>The use of construction materials that have low to zero embodied energy and CO₂ emissions.</i> 	
Policy CAP12 – Climate Action Energy Statements	<i>All new developments involving 15 residential units and/or more than 1,000 sq. m. of commercial floor space, or as otherwise required by the Planning Authority, will be required to submit a Climate Action Energy Statement as part of the overall Design Statement to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development.</i>	A Climate Action Energy Statement Report has been prepared by J.V. Tierney & Co and is submitted here within.
Policy CAP13 – Energy from Renewable Sources	<i>Actively support the production of energy from renewable sources and associated electricity grid infrastructure, such as from solar energy, hydro energy, wave/tidal energy, geothermal, wind energy, combined heat and power (CHP), heat energy distribution such as district heating/cooling systems, and any other renewable energy sources, subject to normal planning and environmental considerations.</i>	A Climate Action Energy Statement Report has been prepared by J.V. Tierney & Co and is submitted here within which demonstrates the usage of Exhaust Heat Pumps and Photo Voltaic panels to meet the renewable energy requirements.
Policy CAP18 – Waste Heat, District Heating and Decentralised Energy	<i>Actively encourage the development of low carbon and highly efficient district heating and decentralised energy systems across the County utilising low carbon heat sources such as renewable energy and waste heat recovery and to promote the connection of new developments to district heating networks where such systems exist/can be developed in a given area.</i>	A Climate Action Energy Statement Report has been prepared by J.V. Tierney & Co and is submitted here within. The proposed development can be adapted in future in the event of a district heating system being providing to the area in future.

Policy CAP19 – Supporting the Potential of District Heating in Fingal	<i>Support the potential of district heating in Fingal, all Climate Action Energy Statements submitted to the Council (see Policy CAP12) shall include an assessment of the technical, environmental and economic feasibility of district or block heating or cooling, particularly where it is based entirely, or partially on energy from renewable and waste heat sources.</i>	A Climate Action Energy Statement Report has been prepared by J.V. Tierney & Co and is submitted here within. The proposed development can be adapted in future in the event of a district heating system being providing to the area in future.
Policy CAP27 – Electric Vehicles	<i>Ensure that sufficient charging points and rapid charging infrastructure are provided on existing streets where such infrastructure does not impede persons with mobility issues and in new developments subject to appropriate design, siting and built heritage considerations and having regard to the Planning and Development Regulations 2001 as amended, which have been updated to include EV vehicle charging point installation, so that EV Street Charging Points be provided to every community of the County.</i>	The proposed development will be designed to ensure all car park spaces that are indicated as EV charging spaces will be provided with charging points. All other spaces will be provided with infrastructure such as ducting to ensure these spaces can be provided with charging points in the future.

7.4.6 Chapter 6: Connectivity and Movement

Policy / Objective No.	Policy / Objective	Comment
Policy CMP1 – Decarbonisation of Motorised Transport	<i>Support the decarbonisation of motorised transport and facilitate modal shift to walking, cycling and public transport and taking account of National and Regional policy and guidance, while supporting an efficient and effective transport system.</i>	Please refer to response to Strategic Objective 9 with respect to sustainable travel measures.
Policy CMP2 – Managing Demand for Travel	<i>Concentrate compact growth around existing and planned transport services ensuring that transport and land-use are integrated to the greatest extent possible so that the demand for travel in general and for car-based travel is reduced.</i>	The development site is located within close proximity to the future Metro Swords Central Station, a number of existing bus services and the town of Swords which includes a number of amenities and facilities, thereby reducing the need to travel by

		car. Please refer to response to Strategic Objective 9 with respect to sustainable travel measures for further detail.
Objective CMO ₃ – Integration of Public Transport and Development	<i>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.</i>	Please refer to response to Strategic Objective 9 and Policy CMP ₂ with respect to sustainable travel measures and alignment with public transport.
Policy CMP ₅ – Mobility Management and Travel Planning	<i>Promote best practice mobility management and travel planning through the requirement for proactive mobility strategies for developments focussed on prioritising sustainable modes of travel including walking, cycling and public transport.</i>	OCSC Consulting Engineers have developed a bespoke Mobility Management Plan and Traffic Assessment & Parking Strategy for the site and included with this application.
Policy CMP ₇ – Pedestrian and Cycling Network	<i>Secure the development of a high-quality, connected and inclusive pedestrian and cycling network and provision of supporting facilities / infrastructure across the County, including the upgrade of the existing network and support the integration of walking, cycling and physical activity with placemaking including public realm improvements, in collaboration with the NTA, other relevant stakeholders, local communities and adjoining Local Authorities in the context of the impact of development schemes with cross boundary impacts and opportunities where appropriate. Routes within the network shall have regard to NTA and TII national standards and policies.</i>	The development includes an upgrade of the bordering pedestrian and cycle infrastructure in line with the Cycle Design Manual and DMURS . Good permeability is also provided throughout the site including a connection to the adjacent public park to the west.
Policy CMP ₉ – Prioritisation of Pedestrians and Cyclists	<i>Support the prioritisation of pedestrians and cyclists and the provision of improved public realm to make</i>	The development includes an upgrade of the bordering pedestrian and cycle infrastructure in line with the Cycle Design Manual and DMURS . Good permeability is also provided

	<i>walking and cycling safer, healthier, quicker, more direct and more attractive.</i>	throughout the site including a connection to the adjacent public park to the west. Extensive cycle parking is also proposed throughout the development.
Policy CMP10 – Bicycle Infrastructure	<i>Improve bicycle priority measures and cycle parking infrastructure throughout the County in accordance with best accessibility practice.</i>	Please refer to response to Policy CMP9.
Objective CMO6 – Improvements to the Pedestrian and Cyclist Environment	<i>Maintain and improve the pedestrian and cyclist environment and promote the development of a network of pedestrian/ cycle routes which link residential areas with schools, employment, recreational destinations and public transport stops to create a pedestrian/cyclist environment that is safe, accessible to all in accordance with best accessibility practice.</i>	Please refer to response to Policy CMP9.
Policy CMP12 – Public Realm	<i>Support and facilitate the provision of high-quality and attractive public realm that is accessible for all with a focus on improving connectivity and permeability in accordance with best practice public realm and guidance documents.</i>	Proposed routes through the site are generally flat and smooth surfaced so that wheelchair users or people who are less abled are able to move freely in the site. These routes will significantly improve the permeability and connectivity of the area.
Policy CMP13 – Accessible Pedestrian and Cyclist Environment	<i>Promote and facilitate a network of pedestrian and cycle routes and public realm that is universally accessible for all ages and abilities in accordance with best accessibility practice.</i>	Please refer to response to Policy CMP9.
Policy CMP14 – Permeable Neighbourhoods	<i>Implement the provisions of the Design Manual for Urban Roads and Streets 2019 (DMURS) and the DMURS Interim Advice Note – Covid 19 Pandemic Response 2020 in relation to the delivery of safe streets and overall best practice design and promote the principle of filtered permeability in new developments to ensure that all pedestrian entrances are opened as soon as any new development is</i>	The development has been designed fully in accordance with DMURS and the Cycle Design Manual, prioritising the movement of pedestrian and cyclists throughout and providing permeability for active modes from all boundaries with public areas. The extent of roads is minimal to facilitate access to a notably reduced quantum of car parking and for emergency and servicing vehicles as appropriate.

	<i>occupied where feasible and seek opportunities to improve permeability in existing developed areas in accordance with NTA's Permeability Best Practice Guide.</i>	
Policy CMP23 – Car Clubs/Car Sharing Schemes	<i>Support and facilitate the set up and operation of car-clubs and car-sharing schemes to facilitate an overall reduction in car journeys and car parking requirements.</i>	Out of the 24 No. car parking spaces proposed, the development will include 6 No. car club spaces to help reduce private car usage.
Objective CMO32 – Car Parking Standards	<i>Implement appropriate car parking standards for a range of land-use types, where provision is based on factors such as site location, level of public transport accessibility and impact of parking provision on local amenity.</i>	The development has developed a car parking strategy specifically tailored for the development site based on its unique characteristics including proximity to existing and planned public transport infrastructure, such as the Metro Swords Central Station, and the proximity to key services and amenities in Swords Town Centre which reduce the need to travel by car. This is set out in detail in the submitted <i>Traffic Assessment & Parking Strategy</i>.
Objective CMO45 – Design Manual for Urban Roads and Streets	<p><i>Design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within DMURS.</i></p> <ul style="list-style-type: none"> • <i>Junctions will be designed with corner radi that reduce pedestrian crossing distances to the minimum allowable by DMURS wherever possible.</i> • <i>The narrowest carriageway widths allowable by DMURS will be the default standard in Fingal wherever possible.</i> 	Please refer to response to Policy CMP14.

7.4.7 Chapter 9: Green Infrastructure and Natural Heritage

Policy / Objective No.	Policy / Objective	Comment
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<p>Policy GINHP1 – Resilient Design</p>	<p><i>Promote an awareness of the benefits of resilient design and the multi-functional nature of green infrastructure. Apply multi-functional principles of green infrastructure to inform the Development Management process in terms of design and layout of new residential areas, business/industrial development and other significant projects while maximising the multi-functional nature of green infrastructure by ensuring the development of synergies between Public Open Space, Biodiversity, SuDS/Water Sensitive Design, Climate Change and Active Travel objectives.</i></p>	<p>The approach to the landscape design has been informed by a Green Infrastructure approach whereby the multi functionality of green space is promoted to deliver multiple benefits to the community. This is illustrated in detail in the accompanying <i>Landscape Report</i>.</p>
<p>Policy GINHP2 – Protection of Green Infrastructure</p>	<p><i>Ensure that areas and networks of green infrastructure are identified, protected, enhanced, managed and created to provide a wide range of environmental, social and economic benefits to communities.</i></p>	<p>The network of green spaces proposed to the outside of the building are interconnected and also connected to the existing public park to the west of the site.</p>
<p>Policy GINHP3 – Greening of Developments</p>	<p><i>Encourage measures for the 'greening' of new developments including the use of green roofs, brown roofs, green walls and water harvesting. Where feasible require new developments to incorporate greening elements such as green roofs, brown roofs, green walls, green car parking and SuDs (e.g. clean water ponds fed by rainwater via downpipes).</i></p>	<p>The proposed development incorporates green roofs on the building and nature-based solution for SuDS.</p>
<p>Objective GINHO2 – Fragmentation</p>	<p><i>Reduce fragmentation and enhance the resilience of Fingal's green infrastructure network by strengthening ecological links between urban areas, Natura 2000 sites, proposed Natural Heritage Areas, parks and open spaces and the wider regional network by connecting all new developments into the wider green infrastructure network.</i></p>	<p>The proposed site plan for the development avoids fragmentation of the green infrastructure network by protecting and enhancing the existing tree belt on the western boundary.</p>

Objective GINHO3 – Biodiversity in Open Space	<i>Make provision for biodiversity within public open space and include water sensitive design and management measures (including SuDS) as part of a sustainable approach to open space design and management.</i>	The proposed landscape design incorporates many measures for biodiversity benefit including native tree planting, pollinator friendly tree, shrub and groundcover planting, bulb planting and meadow grassland.
Objective GINHO4 – Green Infrastructure and Development	<i>Resist development that would fragment or prejudice the County’s strategic green infrastructure network.</i>	The proposed site plan for the development avoids fragmentation of the green infrastructure network by protecting and enhancing the existing tree belt on the western boundary.
Policy GINHP6 – Multi-Functionality	<i>Ensure delivery of multifunctional green and civic spaces that meet community needs, promote active and passive recreation, flood and surface water management and local habitat improvements. The multi-functionality of spaces will be balanced against the need to protect and enhance local habitat and the recreational and functional requirements of parks.</i>	The proposed green spaces within the development are multi-functional and will provide nature-based solutions for SuDS. The open space provides active recreation in the form of children’s play and kickabout and an environment for passive recreation, walking and sitting out.
Objective GINHO7 – Provision of Open Space	<i>Provide a range of accessible new parks, open spaces and recreational facilities accommodating a wide variety of uses (both passive and active), use intensities and interests.</i>	The proposed development provides a new publicly accessible open space for passive recreation and play (active).
Objective GINHO8 – Routes	<i>Provide attractive and safe routes linking parks and open spaces and other related features such as cultural sites and heritage assets as an integral part of green infrastructure provision, where appropriate and feasible.</i>	The proposed development will include numerous pedestrian and cyclist linkages and routes in and around the site, increasing the level of connectivity and permeability locally and ensuring a high level of passive surveillance of the public open space and wider site.
Objective GINHO12 – Green Infrastructure Requirements	<i>Ensure the provision of new green infrastructure addresses the requirements of functional flood storage, the sustainable management of coastal erosion, and links with provision for biodiversity, Sustainable Drainage Systems (SuDS) and provision</i>	The development includes a comprehensive surface water design and strategy which prioritises nature based and above ground measures wherever possible. This have been co-ordinated with a high-quality landscape design to ensure SuDS measures incorporated into open space areas are of the highest quality and remain functional for this purpose. The network

	<i>for parks and open space wherever possible and appropriate.</i>	has been fully modelled in Causeway Flow to ensure it operates to the required level. Please refer to the submitted <i>Engineering Services Report</i> for full detail.
Objective GINHO13 – Wetlands	<i>Seek the creation of new wetlands and/or enhancement of existing wetlands through provision for Sustainable Drainage Systems (SuDS) where appropriate.</i>	It has not been feasible to provide new wetlands in the public open space as it would conflict with the use of the space for active recreation.
Objective GINHO14 – Green Roofs	<i>Seek the provision of green roofs and green walls as an integrated part of Sustainable Drainage Systems (SuDS) and which provide benefits for biodiversity, wherever possible.</i>	Extensive blue and green roofs are proposed across the apartment block roof levels, where not conflicting with proposed constraints such as PV panels. Please refer to the submitted <i>Engineering Services Report</i> for further detail.
Objective GINHO15 – SuDS	<i>Limit surface water run-off from new developments through the use of appropriate Sustainable Urban Drainage Systems (SuDS) using nature-based solutions and ensure that SuDS is integrated into all new development in the County.</i>	The development includes a comprehensive surface water design and strategy which prioritises nature based and above ground measures wherever possible such as detention basins, extensive blue roofs, permeable paving etc. This have been co-ordinated with a high-quality landscape design to ensure SuDS measures incorporated into open space areas are of the highest quality and remain functional for this purpose. The network has been fully modelled in Causeway Flow to ensure it operates to the required level. Please refer to the submitted <i>Engineering Services Report</i> for full detail.
Policy GINHP8 – Archaeology and Green Infrastructure	<i>Protect, conserve and enhance landscape, natural, cultural and built heritage features, and support the implementation of the Fingal Heritage Plan in relation to the provision of green infrastructure.</i>	There are no recorded archaeological features on the site.
Objective GINHO17 – Fingal Heritage Plan	<i>Protect, conserve and enhance landscape, natural, cultural and built heritage features, and support the objectives and actions of the Fingal Heritage Plan.</i>	There are no recorded heritage features on the site.
Objective GINHO18 – Heritage Landscape	<i>Ensure, wherever possible and appropriate, that elements of the archaeological and heritage</i>	There are no recorded archaeological features on the site.

	<i>landscape are fully integrated into proposals for new developments at the project design stage.</i>	
Policy GINHP9 – Landscape Character	<i>Ensure green infrastructure provision responds to and reflects landscape character including historic landscape character, conserving, enhancing and augmenting the existing landscapes and townscapes of Fingal which contribute to a distinctive sense of place.</i>	The green infrastructure provision of the development will enhance the character of the local area by providing new green spaces, pedestrian linkages through green spaces and extensive tree, hedging and groundcover planting.
Policy GINHP10 – Green Infrastructure and Development	<i>Seek a net gain in green infrastructure through the protection and enhancement of existing assets, through the provision of new green infrastructure as an integral part of the planning process, and by taking forward priority projects including those indicated on the Development Plan Green Infrastructure maps during the lifetime of the Development Plan.</i>	The proposed development protects the green infrastructure assets in the form of the existing tree belt and adds to those assets with additional tree planting and open space.
Objective GINHO19 – Green Networks	<i>Create an integrated and coherent green infrastructure for the County by requiring the retention of substantial networks of green space in urban, urban fringe and adjacent countryside areas to serve the needs of communities now and in the future including the need to adapt to and mitigate climate change.</i>	The proposed development protects the green infrastructure assets in the form of the existing tree belt.
Objective GINHO21 – Integration of Green Infrastructure	<i>Avoid the fragmentation of green spaces in site design and to link green spaces /greening elements to existing adjacent green infrastructure / the public realm where feasible and to provide for ecological functions.</i>	The proposed site plan for the development avoids fragmentation of the green infrastructure network by protecting the existing tree belt on the western boundary through incorporation into public open space and linking this to a larger public open space on the northern end of the site.
Objective GINHO22 – Network Fragmentation	<i>Resist development that would fragment or prejudice the County’s strategic green infrastructure network.</i>	The proposed development does not impact the County’s strategic green infrastructure network.
Policy GINHP12 – Protected Sites	<i>Protect areas designated or proposed to be designated as Natura 2000 sites (i.e. Special Areas of</i>	The <i>Appropriate Assessment Screening Report</i> accompanying this application has concluded no potential for significant

		<i>Conservation (SACs) and Special Protection Areas (SPAs), proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves, and Refuges for Fauna.</i>	impacts to designated sites as a result of the proposed development.
Policy Biodiversity Guidance	GINHP14 – Net Gain	<i>Promote biodiversity net gain in new developments and develop a planning guidance document on Biodiversity Net Gain.</i>	Proposed planting includes pollinator-friendly tree, shrub, and ground flora, with tree planting to bolster the ecological corridor adjacent to the west boundary of the site and to create a small, wooded area within the centre of the site. See accompanying <i>Landscape Masterplan</i> for details.
Policy Biodiversity Guidance	GINHP15 – in Buildings	<i>Promote the inclusion of swift, swallow, house martin, house sparrow, starling, bat and insect boxes and structures in and on building facades and develop a guidance document on how to incorporate these structures into buildings.</i>	The integration of swift boxes, bat boxes, and pollinator habitat, along with additional ecological enhancement measures are outlined in the accompanying <i>Ecological Impact Assessment Report</i> .
Objective Protection Heritage Areas	GINHO28 – of Natural	<i>Ensure that development does not have a significant adverse impact on proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves, Refuges for Fauna, Habitat Directive Annex I sites and Annex II species contained therein, and on rare and threatened species including those protected by law and their habitats.</i>	The accompanying <i>Appropriate Assessment Screening Report</i> and <i>Ecological Impact Assessment Report</i> both concluded that the proposed development would not have significant adverse impacts on any designated sites or rare/protected species and their associated habitats.
Objective Development Species	GINHO32 – and Invasive	<i>Ensure that proposals for development do not lead to the spread or introduction of invasive species. If developments are proposed on sites where invasive species are or were previously present, the applications will be required to submit a control and management program for the particular invasive species as part of the planning process and to comply with the provisions of European Communities (Birds and Natural Habitats) Regulations 2011 and EU Regulations 1143/2014.</i>	Invasive species management practises have been outlined in the <i>Ecological Impact Assessment Report</i> to control the medium and low impact invasive species recorded on Site.

<p>Policy GINHP17 – Protection of European and National Sites</p>	<p><i>Strictly protect areas designated or proposed to be designated as Natura 2000 sites (i.e. Special Areas of Conservation (SACs) and Special Protection Areas (SPAs); also known as European sites) including any areas that may be proposed for designation or designated during the lifetime of this Plan.</i></p>	<p>The <i>Appropriate Assessment Screening Report</i> accompanying this application has concluded no potential for significant impacts to designated sites as a result of the proposed development.</p>
<p>Policy GINHP18 – Species Protection</p>	<p><i>The Council will seek to protect rare and threatened species, including species protected by law and their habitats by requiring planning applicants to demonstrate that proposals will not have a significant adverse impact on such species and their habitats.</i></p>	<p>The <i>Ecological Impact Assessment Report</i> concluded the proposed development would not have significant adverse impacts on any rare/threatened species.</p>
<p>Objective GINHO33 – Annex I and Annex II</p>	<p><i>Ensure that development does not have a significant adverse impact on proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves, Refuges for Fauna, Habitat Directive Annex I sites and Annex II species contained therein, and on rare and threatened species including those protected by law and their habitats.</i></p>	<p>The <i>Appropriate Assessment Screening Report</i> and <i>Ecological Impact Assessment Report</i> both concluded the proposed development would not have significant adverse impacts on any designated sites or rare/protected species or habitats.</p>
<p>Policy GINHP19 – Ecological Buffer Zones</p>	<p><i>Protect the functions of the ecological buffer zones and ensure proposals for development have no significant adverse impact on the habitats and species of interest located therein.</i></p>	<p>As outlined in the <i>Ecological Impact Assessment Report</i>, the ecological corridor along the west of the site will be bolstered by planting and maintained as a dark corridor, with tree protection measures to be put in place during construction works.</p>
<p>Objective GINHO35 – Appropriate Assessment</p>	<p><i>In accordance with <i>Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities 2010</i>, any plans or projects that are likely to have a significant effect on a Natura 2000 site, either individually or in combination with other plans or projects, are subject to a screening for <i>Appropriate Assessment</i> unless they are directly connected with</i></p>	<p>The <i>Appropriate Assessment Screening Report</i> accompanying this application has concluded no potential for significant impacts to designated sites as a result of the proposed development.</p>

	<i>or necessary to the management of a Natura 2000 site.</i>	
Objective GINHO ₄₀ – Ecological Assessments	<i>Protect the ecological functions and integrity of the corridors indicated on the Plan Green Infrastructure maps. An ecological assessment may be required for any proposed development likely to have a significant impact on habitats and species of interest in an ecological corridor or stepping-stone.</i>	As outlined in the <i>Ecological Impact Assessment Report</i>, the ecological corridor along the west of the site will be bolstered by planting and maintained as a dark corridor, with tree protection measures to be put in place during construction works.
Objective GINHO ₄₁ – Protection of Rivers	<i>Protect rivers, streams and other watercourses and maintain them in an open state capable of providing suitable habitat for fauna and flora, including fish.</i>	These habitats are not present on site, with the closest mapped watercourse some 440 No. metres from the site. Best practice surface water protection measures will be put in place during the construction works and SuDS measures are included as part of the project design to protect the local surface water network and any downstream watercourses.
Objective GINHO ₄₂ – Inland Fisheries	<i>Take full account of Inland Fisheries Guidelines on the Protection of Fisheries during Construction works in and adjacent to Waters 2016 and Planning for Water Courses in the Urban Environment 2020 when undertaking, approving or authorising development or works which may impact on rivers, streams and canals and their associated habitats and species.</i>	Best practice surface water protection measures will be put in place during the construction works and SuDS measures are included as part of the project design to protect the local surface water network and any downstream watercourses.
Objective GINHO ₄₄ – Setback of New Surface Water Drainage Outfalls	<i>Set back new surface water drainage outfalls from the main river channel on the landward edge of the floodplain or a designed wetland feature to cater for water quality improvement before the surface discharges into the river.</i>	SuDS measures are included as part of the project design to protect the local surface water network and any downstream watercourses
Policy GINHP ₂₁ – Protection of Trees and Hedgerows	<i>Protect existing woodlands, trees and hedgerows which are of amenity or biodiversity value and/ or contribute to landscape character and ensure that proper provision is made for their protection and management in line with the adopted Forest of Fingal-A Tree Strategy for Fingal.</i>	As outlined in the <i>Ecological Impact Assessment Report</i>, the ecological corridor along the west of the site will be bolstered by planting and maintained as a dark corridor, with tree protection measures to be put in place during construction works.

<p>Policy GINHP22 – Tree Planting</p>	<p><i>Provide for appropriate protection of trees and hedgerows, recognising their value to our natural heritage, biodiversity and climate action and encourage tree planting in appropriate locations.</i></p>	<p>The proposed development provides for the protection of the existing tree belt on the western boundary of the site, and where feasible, retention of good quality trees within the site. A total of 4 No. trees are to be removed on site to cater for the proposed drainage services, new pedestrian footpath and cycle lane, and fire tender circulation. There will be a significant quantum of replacement trees and planting to ensure a greater range in biodiversity and visual amenity than what is currently provided. As stated in the accompanying <i>Arboricultural Assessment & Impact Report</i>:</p> <p><i>“A diverse range of tree species and cultivars are proposed within the landscape masterplan for the site. This will increase overall numbers of trees from current levels and provide a greater range of ecosystem services than currently provided by the existing tree population. In terms of mitigation it is considered that the proposed planting more than compensates for trees to be removed.”</i></p>
<p>Objective GINHO46 – Tree Removal</p>	<p><i>Ensure adequate justification for tree removal in new developments and open space management and require documentation and recording of the reasons where tree felling is proposed and avoid removal of trees without justification.</i></p>	<p>As stated above, a total of 4 No. trees are required to be removed on site to cater for the proposed drainage services, new pedestrian footpath and cycle lane, and fire tender circulation. Please refer to the <i>Arboricultural Assessment & Impact Report</i> and the plans entitled ‘<i>Arboricultural Assessment & Constraints</i>’, ‘<i>Arboricultural Impact</i>’ & ‘<i>Tree Protection</i>’ for further details.</p>
<p>Objective GINHO54 – Soils</p>	<p><i>Reduce land take, soil sealing and loss of natural soils in urban and rural areas.</i></p>	<p>The <i>Resource and Waste Management Plan</i> states that 3,400 No. tonnes of excavated soil and stones will be reused on site for land scaping and fill. If any of the excavated material is deemed unsuitable for reuse or not required, then the material</p>

		will need to be removed offsite for appropriate offsite reuse, recovery, recycling and / or disposal.
Policy GINHP25 – Preservation of Landscape Types	<i>Ensure the preservation of the uniqueness of a landscape character type by having regard to the character, value and sensitivity of a landscape when determining a planning application.</i>	The site is located within a developing urban area and does not represent a landscape character of high sensitivity or distinctive character. The visual impact of the development is assessed within a <i>Landscape and Visual Impact Assessment</i> accompanying this application.
Objective GINHO55 – Protection of Skylines	<i>Protect skylines and ridgelines from development.</i>	The visual impact of the development is assessed within a <i>Landscape and Visual Impact Assessment</i> accompanying this application.
Objective GINHO56 – Visual Impact Assessments	<i>Require any necessary assessments, including visual impact assessments, to be prepared prior to approving development in highly sensitive areas.</i>	The visual impact of the development is assessed within a <i>Landscape and Visual Impact Assessment</i> accompanying this application.
Objective GINHO57 – Development and Landscape	<i>Ensure development reflects and, where possible, reinforces the distinctiveness and sense of place of the landscape character types, including the retention of important features or characteristics, taking into account the various elements which contribute to their distinctiveness such as geology and landform, habitats, scenic quality, settlement pattern, historic heritage, local vernacular heritage, land-use and tranquillity.</i>	The site is located within a developing urban area and does not represent a landscape character of high sensitivity or distinctive character. The landscape feature of note being the tree belt on the western boundary of the development is protected.
Objective GINHO58 – Sensitive Areas	<i>Resist development such as houses, forestry, masts, extractive operations, landfills, caravan parks, and campsites, and large agricultural/horticulture units which would interfere with the character of highly sensitive areas or with a view or prospect of special amenity value, which it is necessary to preserve.</i>	As stated above, the site is not located in a sensitive area and the proposed development will not interfere with any view or prospect of special amenity, as confirmed in the accompanying <i>Landscape and Visual Impact Assessment</i> .

<p>Objective GINHO59 – Development and Sensitive Areas</p>	<p><i>Ensure that new development does not impinge in any significant way on the character, integrity and distinctiveness of highly sensitive areas and does not detract from the scenic value of the area. New development in highly sensitive areas shall not be permitted if it:</i></p> <ul style="list-style-type: none"> • <i>Causes unacceptable visual harm.</i> • <i>Introduces incongruous landscape elements.</i> • <i>Causes the disturbance or loss of (i) landscape elements that contribute to local distinctiveness, (ii) historic elements that contribute significantly to landscape character and quality such as field or road patterns, (iii) vegetation which is a characteristic of that landscape type and (iv) the visual condition of landscape elements.</i> 	<p>The site is located within a developing urban area and does not represent a landscape character of high sensitivity or distinctive character.</p> <p>The proposed development does not introduce incongruous landscape elements.</p> <p>The development does not result in the disturbance or loss of elements that contribute to local distinctiveness, does not adversely impact landscape character or result in the loss of significant vegetation.</p> <p>The above is further detailed in the accompanying <i>Landscape and Visual Impact Assessment</i>.</p>
<p>Objective GINHO60 – Protection of Views and Prospects</p>	<p><i>Protect views and prospects that contribute to the character of the landscape, particularly those identified in the Development Plan, from inappropriate development.</i></p>	<p>The proposed development does not impact views and prospects identified in the <i>Development Plan</i>.</p>
<p>Objective GINHO61 – Landscape/ Visual Assessment</p>	<p><i>Require a Landscape/Visual Assessment to accompany all planning applications for significant proposals that are likely to affect views and prospects.</i></p>	<p>The visual impact of the development is assessed within a <i>Landscape and Visual Impact Assessment</i> accompanying this application.</p>
<p>Policy GINHP28 – Protection of High Amenity Areas</p>	<p><i>Protect High Amenity areas from inappropriate development and reinforce their character, distinctiveness and sense of place.</i></p>	<p>The proposed development does not impact high amenity areas.</p>
<p>Objective GINHO67 – Development and High Amenity Areas</p>	<p><i>Ensure that development reflects and reinforces the distinctiveness and sense of place of High Amenity areas, including the retention of important features or characteristics, taking into account the various elements which contribute to its distinctiveness such</i></p>	<p>The proposed development does not impact high amenity areas.</p>

	<i>as geology and landform, habitats, scenic quality, settlement pattern, historic heritage, local vernacular heritage, land-use and tranquillity.</i>	
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7.4.8 Chapter 10: Heritage, Culture and Arts

Policy / Objective No.	Policy / Objective	Comment
Policy HCAP ₃ – Record of Monuments and Places/ Sites and Monuments Record	<i>Safeguard archaeological sites, monuments, objects and their settings listed in the Record of Monuments and Places (RMP), Sites and Monuments Record (SMR), underwater cultural heritage including protected wrecks and any additional newly discovered archaeological remains.</i>	As identified on the Map Sheets of the <i>Development Plan</i>, there are no archaeological sites, monuments, or objects at or in proximity to the subject site.

7.4.9 Chapter 11: Infrastructure and Utilities

Policy / Objective No.	Policy / Objective	Comment
Objective IUO ₃ – Water Services Infrastructure	<i>Ensure that all new developments in areas served by a public foul sewerage network connect to the public sewerage system and comply with the requirements of the Uisce Éireann Foul Sewer specification (where applicable).</i>	The foul network to serve the proposed development has been designed in accordance with Uisce Éireann requirements. A Confirmation of Feasibility and Statement of Design Acceptance has been received which confirms capacity in the local network to accommodate the development. The Confirmation of Feasibility is attached as Appendix C to the <i>Engineering Services Report</i>.
Objective IUO ₄ – Separate Foul and Surface Water Drainage Systems	<i>Require all new development to provide separate foul and surface water drainage systems and to prohibit the connection of surface water outflows to the foul drainage network where separation systems are available, and vice versa (foul to surface), where separation systems are available</i>	Separate foul and surface water drainage networks are proposed with separate connections to the respective external networks.

<p>Objective IUO8 – Taking in Charge of Private Drainage Infrastructure</p>	<p><i>Require that all new surface water infrastructure within public or private developments be constructed in accordance with the standards set out within the Greater Dublin Regional Code of Practice for Drainage Works, as amended, irrespective of the management and maintenance regime proposed for the development or whether or not the development is intended to be taken in charge, in full or in part (i.e. infrastructure shall be to designed to taking in charge standards).</i></p>	<p>The development surface water network is designed to be fully compliant with the Greater Dublin Regional Code of Practice for Drainage Works. Refer to the <i>Engineering Services Report</i> for further detail.</p>
<p>Policy IUP10 – Water Conservation and SuDS</p>	<p><i>Promote the inclusion of water conservation and SuDS measures in all developments, to reduce the level of surface water run-off, improve water quality and contribute to adaptation to climate change through natural solutions.</i></p>	<p>Extensive SuDS measures are proposed throughout the development coordinated with the landscape design. Allowance for climate change is made as part of the design. Features include detention basins, blue roofs, permeable paving etc. as detailed in the submitted <i>Engineering Services Report</i>. These features allow for infiltration to ground where possible and also act as treatment measures to improve the quality of water discharged.</p>
<p>Objective IUO9 – Surface Water Drainage Systems</p>	<p><i>Maintain and enhance existing surface water drainage systems in the County and to require SuDS in new developments where appropriate, as set out in the Greater Dublin Strategic Drainage Study (Vol 2: New Development) / Greater Dublin Regional Code of Practice for Drainage Works).</i></p>	<p>Please refer to response to Policy IUP10.</p>
<p>Objective IUO10 – SuDS – Nature-Based Solutions</p>	<p><i>SuDS shall incorporate nature-based solutions and have regard to the objectives set out in Fingal’s Guidance Document – Green/ Blue Infrastructure for Development, as amended (Appendix 11) and Nature Based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas, Water Sensitive Urban Design Best Practice Interim Guidance Document (November 2021, DHLGH).</i></p>	<p>Please refer to response to Policy IUP10.</p>

<p>Objective IUO11 – SuDS in New Developments</p>	<p><i>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:</i></p> <ul style="list-style-type: none"> • <i>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.</i> • <i>Open space areas shall not be dominated by SuDS features.</i> • <i>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.</i> <p><i>See also Appendix 11 (SuDS Guidance Document), and Chapter 14 Development Management Standards (Section 14.20.3 SuDS).</i></p>	<p>Please refer to response to Policy IUP10.</p>
<p>Objective IUO12 – Green Roofs</p>	<p><i>Require the use of Green Roofs particularly on apartment, commercial, leisure and educational buildings as part of the overall surface water management strategy for each development, where appropriate.</i></p>	<p>Extensive blue and green roofs are proposed across the apartment block roof levels, where not conflicting with proposed constraints such as PV panels. Please refer to the submitted <i>Engineering Services Report</i> for further detail.</p>
<p>Objective IUO13 – Surface Water Run-Off</p>	<p><i>Require that all surface water run-off from new / extended domestic driveways, repaired/replacement driveways and vehicular entrances (where such development is not exempted from the requirement to obtain planning permission) is managed using</i></p>	<p>Please refer to response to Policy IUP10.</p>

	<i>SuDS, ensuring no increase in surface water discharges to the public drainage network.</i>	
Objective IUO15 – Surface Water Management Plan	<p><i>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> 	A 'Surface Water Management Design Statement' is attached as Appendix D to the submitted <i>Engineering Services Report</i>.
Objective IUO16 – OPW Flood Risk Management Guidelines	<i>Have regard to the OPW Flood Risk Management Guidelines 2009, as revised by Circular PL 2/2014, when assessing planning applications and in the preparation of statutory and non-statutory plans and to require site specific flood risk assessments to be considered for all new developments within the County. All development must prepare a Stage 1 Flood Risk Analysis and if the flooding risk is not screened out, they must prepare a Site-Specific Flood Risk Assessment (SSFRA) for the development, where appropriate.</i>	A Site-Specific Flood Risk Assessment has been carried out for the development and can be found in the submitted <i>Engineering Services Report</i>. It concluded that the development lies outside of Flood Zones A and B meaning it is low risk and the type of use proposed is appropriate as per the PRFM Guidelines.
Objective IUO17 – Strategic Flood Risk Assessment	<i>Implement and comply fully with the recommendations of the Strategic Flood Risk Assessment prepared as part of the Fingal Development Plan 2023–2029.</i>	Please refer to the response to Objective IUO16.

Objective IUO18 – SFRA Recommendations	<i>All Flood Risk Assessments must comply with the recommendations from the SFRA report.</i>	Please refer to the response to Objective IUO16.
Objective IUO19 – Medium Range Future Scenario Climate Change Predictions	<i>Surface water designs must include 'Medium Range Future Scenario Climate Change Predictions'.</i>	The surface water design has made allowance for 20% increase in rainfall intensity as per the <i>Development Plan</i> and as set out in the submitted <i>Engineering Services Report</i> .
Objective IUO21 – Precautionary Principle in OPW Guidelines	<i>Require all developments in the County to be designed and constructed in accordance with the 'Precautionary Principle' as detailed in the OPW Guidelines and to minimise the flood risk in Fingal from all potential sources of flooding as far as is practicable, including coastal, pluvial, fluvial, reservoirs and dams, and the piped water system.</i>	Please refer to the response to Objective IUO16.
Policy IUP21 – Environmental Policy, Legislation and Guidance	<i>Have regard to European Union, National and Regional waste and related environmental policy, legislation, guidance and codes of practice to improve management of material resources and wastes.</i>	Environmental policy, legislation, guidance and codes of practice at European, national and regional levels relating to the management of material resources and wastes have been addressed and referenced in the <i>Operational Waste Management Plan</i> and <i>Resource and Waste Management Plan</i> .
Policy IUP22 – Transition From A Waste Economy Towards A Green Circular Economy	<i>Support the principles of transition from a waste economy towards a green circular economy and implement good waste management and best practices to enable Fingal to become self-sufficient in terms of resource and waste management and to enhance employment and increase the value recovery and recirculation of resources, in accordance with the Whole of Government Circular Economy Strategy 2022.</i>	The whole of <i>Government Circular Economy Strategy 2022</i> has been referenced in both the <i>Operational Waste Management Plan</i> and <i>Resource and Waste Management Plan</i> . Methods of reuse and recycling of construction, demolition and domestic waste that align with a transition to a circular economy are also outlined in both the <i>Operational Waste Management Plan</i> and <i>Resource and Waste Management Plan</i> .
Objective IUO28 – Eastern Midlands Region Waste Management Plan	<i>Implement the provisions of the Eastern Midlands Region Waste Management Plan 2015–2021 or any subsequent Waste Management Plan applicable within the lifetime of the Development Plan. All prospective developments in the County will be expected to take account of the provisions of the</i>	<i>Eastern Midlands Region Waste Management Plan 2015–2021</i> has been superseded by <i>The National Waste Management Plan for a Circular Economy 2024-2030 ('NWMPCE') (2024)</i> . The <i>Operational Waste Management Plan</i> and <i>Resource and Waste Management Plan</i> provides information necessary to

	<i>Regional Waste Management Plan and adhere to the requirements of that Plan.</i>	ensure that the management of construction and operational phase of the project is undertaken in accordance with the NWMPCE .
Objective I UO ₃₀ – Hazardous Waste	<i>Adhere to the recommendations of the National Hazardous Waste Management Plan 2014–2020 and any subsequent plan, and to co-operate with the EPA and other agencies in the planning, organisation and supervision of the disposal of hazardous waste streams, including hazardous waste identified during construction and demolition projects. To continue to promote the use of clean technology and minimisation of hazardous waste production in all development within the County.</i>	The Resource and Waste Management Plan addresses the management of hazardous waste’s such as contaminated soil and Asbestos Containing Materials.
Policy IUP ₂₄ – Recycling / Re-Use	<i>Promote and encourage the establishment of re-use, recycling and repair activities to prevent and minimise waste generation and disposal, in accordance with the Eastern Midlands Region Waste Management Plan 2015–2021 (or any subsequent plan).</i>	The Operational Waste Management Plan and Resource and Waste Management Plan outlines actions that can be taken to increase the re-use & recycling of waste products generated during the construction and operational phase in accordance with the NWMPCE.
Objective I UO ₃₄ – Waste Management in New Developments	<i>Require the provision of appropriate, well designed, accessible space to support the storage, separation and collection of as many waste and recycling streams as possible in all new commercial and residential developments within the County. See also Chapter 14, Development Management Standards (Section 14.20.12: Waste Management).</i>	The Operational Waste Management Plan includes a list of requirements the waste storage area must have. This includes clear signage to aid waste segregation. A detailed sizing exercise of the waste room was also carried out during the initial design stage to ensure the waste storage area can accommodate the required number of bins.
Policy IUP ₂₈ – Promote Energy Efficient Development	<i>Promote more energy efficient development through the location of housing and employment along public transport/cycling corridors, where people can choose to use less energy intensive public transport or cycling, rather than being dependent on the car.</i>	The proposed development seeks to reduce car usage through the provision of 404 No. cycle parking spaces (274 No. long-term spaces and 130 No. short-term space) and the numerous pedestrian and cycle routes and linkages through and around the site to promote more active modes of travel. The location of the subject site also benefits from existing bus services along

		the R106 as well as the future Metro Swords Central Station only c. 800 metres south-west of the site.
Objective IUO45 – Undergrounding of Utility Infrastructure	<i>Require that the location of local utility services such as electricity, telephone and television cables be located underground wherever possible, and to promote the undergrounding of existing overhead cables and associated equipment, where possible, in the interests of visual amenity and improved public realm.</i>	Local utility services such as electricity, telephone and television cables will be located underground in line with EIR, Virgin and ESB requirements. Please refer to Drawing Nos. 'MSH-JVT-ZZ-SI-DR-E-600' & 'MSH-JVT-ZZ-SI-DR-E-601' prepared by J.V. Tierney & Co that provide the layout of the existing overhead line and the proposed undergrounding of such lines.
Objective IUO46 – Energy Efficiency of Buildings	<i>Encourage the adaptability of buildings over time and seek to improve the energy efficiency of new and existing building stock including the retro-fitting of energy efficient measures and promote the use of energy efficiency and conservation in the design and development of all new buildings in the County, in accordance with relevant building regulations, national policy and guidance and the targets of Fingal's Climate Change Action Plan.</i>	The proposed development will be designed to fully comply with Technical Guidance Document Part L to ensure we meet the energy, carbon and renewable energy targets required.
Objective IUO62 – Noise Sensitive Developments	<i>Consider the location, design and construction of noise sensitive developments, to ensure they are protected from major noise sources, where practical, and to support and facilitate the monitoring and enforcement by Fingal's Environmental Health Department of noise reduction measures in areas experiencing excess noise.</i>	The accompanying Noise & Vibration Impact Assessment presents a ProPG assessment where consideration of location is addressed.
Objective IUO63 – Noise Exposure Maps	<i>Developments for noise sensitive uses shall have regard to the noise exposure maps contained within the Fingal Noise Action Plan 2018 – 2023 or any supplementary mapping prepared by Fingal County Council, and developers shall be required to produce a noise impact assessment and mitigation plans,</i>	The accompanying Noise & Vibration Impact Assessment presents a baseline noise assessment with comment on EPA noise maps and Fingal Noise Action Plan Airport Noise Zones, an outward and inward noise impact assessment, and recommends mitigation measures.

	<i>where necessary, for any new noise sensitive development within these areas.</i>	
Policy IUP44 – Light Pollution	<i>Promote appropriate lighting installations, availing of best practice as published by the relevant authority, designed to minimise light pollution / unwanted environmental effects while maximising the light reaching the public realm.</i>	An External Public Lighting Report has been prepared by J.V. Tierney & Co and is submitted here within which demonstrates how the proposed developments lighting will be installed to minimise lighting pollution.
Objective IUO64 – Design of Lighting Schemes	<i>Require that the design of lighting schemes minimises the incidence of light spillage or pollution into the surrounding environment and new schemes shall ensure that there is no unacceptable adverse impact on neighbouring development, visual amenity and biodiversity in the surrounding areas.</i>	An External Public Lighting Report has been prepared by J.V. Tierney & Co and is submitted here within which demonstrates how the proposed developments lighting will be installed to minimise lighting spillage.
Objective IUO65 – Lighting: New Developments	<i>Require that new developments are appropriately lit and that all public and external lighting in new residential and commercial developments use highly energy efficient luminaires, with the use of energy saving strategies (such as dimming in line with nationally agreed tariffs) encouraged.</i>	An External Public Lighting Report has been prepared by J.V. Tierney & Co and is submitted here within which indicates the proposed highly efficient LED fittings to be used on this proposed scheme.

7.4.10 Chapter 14: Development Management Standards

Policy / Objective / Table / Section No.	Policy / Objective / Standard	Comment
Objective DMSO1 – Screening for Appropriate Assessment	<i>Ensure that all plans and projects in the County which could, either individually or in combination with other plans and projects, have a significant effect on a European site or sites are subject to Screening for Appropriate Assessment.</i>	An Appropriate Assessment Screening Report has been prepared by Enviroguide Consulting and is submitted herewith.
Objective DMSO2 – Screening for Environmental Impact Assessment	<i>Ensure that all development projects within the County that are below the mandatory thresholds for Environmental Impact assessment, which could individually or in</i>	An Environmental Impact Assessment Screening Report has been prepared by Enviroguide Consulting and is submitted herewith.

	<p><i>combination with other projects have significant effects on the environment are subject to EIA Screening.</i></p>	
<p>Objective DMSO₄ – Key Principles to Consider in the Achievement of Healthy Placemaking</p>	<p>➤ <i>The design and layout of a development, the public realm and supporting infrastructure should incorporate Universal Design insofar as is feasible.</i></p>	<p>➤ The open spaces within the development are designed with a universally accessible network of paths and seating areas for rest and all apartments are designed to be accessible in compliance with Part M of the Building Regulations as well as 11% of the apartments designed to Universal Design standards.</p>
	<p>➤ <i>Development should be well-designed and attractive to all users including children, people with disabilities, the elderly as well as accommodating cyclists and pedestrians.</i></p>	<p>➤ The proposed development will introduce a new unit size to the local area, catering for younger couples looking to start off on the property ladder, older people looking to downsize, or smaller families looking for affordable housing options.</p> <p>➤ The proposed quantum of play space within the public open space and communal open space in the courtyard will facilitate informal nature-based play for young children. Proposed routes through the site are generally flat and smooth surfaced so that wheelchair users or people who are less abled are able to move freely in the site.</p>
	<p>➤ <i>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.</i></p>	<p>➤ The scheme design strikes a balance between respecting the surrounding environment of the scheme and ensuring the development potential of a strategically positioned and underutilised plot is maximised and appropriately densified.</p> <p>➤ The development will provide varied and visually interesting façades for the surrounding streetscape, which will positively contribute to place-making, and will provide sufficient passive surveillance onto communal and public open space and routes.</p>

		<ul style="list-style-type: none"> ➤ The separation distances between existing developments, particularly to dwellings in Seamount View and St. Werburghs, is generous and does not cause any overbearing, overlooking or overshadowing impact. ➤ The existing footpath along the southern and eastern boundary of the site will be significantly improved and upgraded to include a new cycle lane.
	<ul style="list-style-type: none"> ➤ <i>There must be meaningful interaction between individual units within the scheme and the public realm.</i> 	<ul style="list-style-type: none"> ➤ Residents can interact with one another along the numerous paths proposed, within the enclosed courtyard in the amenity areas, or on the perimeter external walkways, which have proved to be valued by residents to support ad-hoc social interaction. ➤ The courtyard style block allows the 4 No. outer faces of the building to provide active surveillance on all open spaces and linkages in and around the site.
	<ul style="list-style-type: none"> ➤ <i>Creation of areas of distinction where communities can foster a sense of identity, irrespective of scale.</i> 	<ul style="list-style-type: none"> ➤ The architectural design of the scheme gives the development a distinct and recognizable aesthetic.
	<ul style="list-style-type: none"> ➤ <i>Importance of the public realm as an area for passive and active use where the community can congregate.</i> 	<ul style="list-style-type: none"> ➤ The proposed linkages and routes through the site will increase pedestrian and cyclist movement and will ensure a high-level of passive surveillance on the public realm.
	<ul style="list-style-type: none"> ➤ <i>High quality finishing materials to proposed buildings and to the public realms, including seating, lighting, landscaping, tree planting, and green infrastructure.</i> 	<ul style="list-style-type: none"> ➤ The primary material context of the development is render and buff brick. It is clear from the detailed <i>Design Statement</i> submitted herewith that high-quality materials have been proposed for the subject scheme

		<p>and will help break down the overall mass and scale of the building. In terms of the proposed public realm, the design of the open spaces will promote community interaction by providing spaces for children to play collectively and social spaces with seating for people to meet and gather outdoors. All open spaces throughout the site incorporates many a high-quality landscape design, including native tree planting, pollinator friendly tree, shrub and groundcover planting, bulb planting and meadow grassland.</p>
	<p>➤ <i>Consideration of shelter, sunlight/daylight and shadowing.</i></p>	<p>➤ <i>The BRE Daylight and Sunlight Assessment submitted herewith assesses the impact of the proposed development in terms of the levels of daylight and sunlight achieved in neighbouring residential dwellings, commercial properties, and the proposed residential units within the scheme itself. The BRE Daylight and Sunlight Assessment concluded the following:</i></p> <p><i>“The site is mostly surrounded by Commercial Properties which do not have the same requirements for daylight/sunlight as Residential Properties do.</i></p> <p><i>The Residential Properties are situated a far distance away from the Proposed Development and will not be impact by the Proposed Development.</i></p> <p><i>The performance of the Proposed Development itself, performs exceptionally well, with very high levels of daylight and sunlight being achieved for the residents.”</i></p> <p>Therefore, due to the proposed separation distances and building height, the amenity of neighbouring</p>

		<p>residential and commercial properties will remain unaffected from a daylight and sunlight perspective, as well as the residential units within the proposed scheme.</p>	
	<ul style="list-style-type: none"> ➤ <i>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</i> 	<ul style="list-style-type: none"> ➤ The proposed design includes an upgrade of the existing pedestrian and cycle infrastructure bordering the site. Active travel modes have been prioritised throughout with only limited road features to facilitate access to a small quantum of car parking and access for emergency and servicing vehicles. The principles of <i>DMURS</i> and the <i>Cycle Design Manual</i> have been incorporated throughout. 	
Objective Design Statement	DMSO5 –	<p><i>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.</i></p>	<p>An <i>Architectural Design Statement</i> has been prepared by Coady Architects and is submitted herewith.</p>
Table 14.4 Development	– Infill	<p><i>Infill Development presents unique opportunities to provide bespoke architectural solutions to gap sites and plays a key role in achieving sustainable consolidation and enhancing public realms. Proposals for infill development will be required at a minimum to:</i></p> <ul style="list-style-type: none"> ➤ <i>Provide a high-quality design response to the context of the infill site, taking cognisance of architectural form, site coverage, building heights, building line, grain, and plot width.</i> ➤ <i>Examine and address within the overall design response issues in relation to over-bearance, overlooking and overshadowing.</i> 	<p>Please refer to Section 7.2 of this Planning Report for details on how the proposed scheme represents appropriate infill development.</p>

	<ul style="list-style-type: none"> ➤ <i>Respect and compliment the character of the surrounding area having due regard to the prevailing scale, mass, and architectural form of buildings in the immediate vicinity of the site.</i> ➤ <i>Provide a positive contribution to the streetscape including active frontage, ensuring that the impacts of ancillary services such as waste management, parking and services are minimised.</i> ➤ <i>Promote active street frontages having regard to the</i> 	
<p>Section 14.5.2 – Building Density</p>	<p><i>The Plan promotes compact growth and consolidation of Fingal’s large urban areas, towns and villages and will support appropriate densities as expressed in national and regional policies NPF, RSES and the Section 28 Guidelines. In complying with national guidance, development proposals must also be cognisant of and respect the character, context and architectural qualities of the surrounding area and seek to ensure in all instances a high-quality architectural response to site development.</i></p>	<p>Please refer to Section 5.2 and 6.1 of this Report for how the proposed development represents the principles of compact growth in accordance with the <i>National Planning Framework and Regional Spatial and Economic Strategy for the Eastern and Midlands Region 2019-2031</i>.</p>
<p>Section 14.5.3 – Building Heights</p>	<p><i>National policies with respect to the achievement of consolidation, increased densities and long-term strategic development are supported by guidance on building height including Urban Development and Building Heights – Guidelines for Planning Authorities 2018. The Guidelines require that increased building height be considered in all urban contexts, subject to ensuring the highest standards of urban design, architectural quality and place-making outcomes. Applications for development proposals which include buildings of increased height and density should clearly demonstrate the suitability and positive impacts of the proposal with reference to the receiving environment, including justification for the height strategy proposed. This includes a demonstration of compliance with the 4 no.</i></p>	<p>Please refer to Section 5.5 of this Report for how the height of the proposed development is appropriate and accords with <i>Urban Development and Building Heights – Guidelines for Planning Authorities 2018</i>.</p>

	<i>Specific Planning Policy Requirements (SPPR's) contained within the Guidelines</i>	
Objective DMSO19 – New Residential Development	<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>All apartments are designed to be efficient and well laid out in line with design exemplars in the <i>Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities (2007)</i>.</p> <p>As demonstrated in Section 5.8 of this Planning Report, the proposed development accords with the <i>Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (January 2024)</i> (replaces the <i>Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, 2009</i>).</p> <p>As demonstrated in Section 5.6 of this Planning Report, the proposed development accords with the <i>Sustainable Urban Housing: Design Standards for New Apartments</i>.</p>
Objective DMSO20 – Schedule of Accommodation	<p><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>A <i>Schedule of Accommodation</i> has been prepared by Coady Architects and is submitted herewith. This demonstrates that all apartment units comply with the standards set out in the <i>Apartment Guidelines</i>.</p>
Objective DMSO21 – Floor Plans for Residential Development	<p><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>A suite of floor plans, which indicate typical furniture layouts and door swings, has been prepared by Coady Architects and is submitted herewith.</p>
Objective DMSO22 – Daylight and Sunlight Analysis	<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>A <i>BRE Daylight and Sunlight Assessment</i> has been prepared by J.V. Tierney & Co and is submitted herewith.</p>

<p>Section 14.6.6.2 – Wind Assessment</p>	<p><i>A Wind Assessment will be required in certain circumstances where buildings of increased height are proposed or in instances where there is potential for wind tunnelling arising from a proposed development. Such an assessment shall clearly establish that the proposed space is suitable for the intended use and should indicate all mitigation measures to be adopted where necessary.</i></p>	<p>The scheme proposes a part 4 No. to part 5 No. storey apartment block and thus it is considered that a Wind Assessment is not required. Generally, these assessments are required when buildings are at least 30 No. metres in height. The maximum height of the development is c. 19.27 metres, which is well below 30 No. metres.</p>
<p>Objective DMSO23 – Separation Distance</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>As demonstrated in Section 4.7 & 7.3.2 of this Planning Report, and in the submitted plans prepared by Coady Architects, the minimum separation distance of 22 metres between directly opposing rear first floor windows of neighbouring dwellings in Seamount View and St. Werburghs, as well as directly opposing windows within the development itself, is met, and in most cases, significantly exceeded.</p> <p>As such, there will be no overshadowing, overlooking or overbearing impacts due to the generous separation distances proposed.</p>
<p>Section 14.6.6.4 – Overlooking and Overbearance</p>	<p><i>Development proposals must assess levels of overbearance and potential to cause significant levels of overlooking to neighbouring properties. Issues in relation to excessive overlooking and overbearance may be addressed through relocation or reduction in building bulk and height. Mitigation measures to ameliorate overbearance should be considered and may include alterations to the bulk and massing of the proposed scheme relative to neighbouring property. Overlooking may also be addressed by appropriate design-led solutions including the sensitive placement of fenestration and balcony treatments.</i></p>	<p>Please refer to the response to Objective DMSO23 above which demonstrates there will be no overlooking or overbearing impacts on surrounding properties due to the proposed generous separation distances.</p> <p>The scheme is part 4 No. to part 5 No. storeys in height, which is considered to be an appropriate transition in height from the 2 No. storey dwellings in Seamount View housing estate and 3 No. storey apartments in St. Werburghs estate. It is noted that the previously permitted schemes on site were 5 No. and 6 No. storeys also.</p> <p>The building modulates and steps down in various places across the elevations and roofscapes, and with the use of a</p>

		<p>diverse material and colour palette, the visual bulk of the building is reduced. Outward balconies also add to the variation across the elevations, rather than providing one long-uninterrupted wall.</p> <p>Furthermore, the existing western boundary of the site, which is proposed to be retained and enhanced, will provide a landscape buffer between the apartment block and existing dwellings in Seamount View. This is reiterated in the <i>Landscape and Visual Impact Assessment</i>:</p> <p><i>“Existing boundary planting to the south of the business park and west of the proposed development will screen a substantial portion of the new built environment from view”</i></p> <p>The R106 will also provide visual relief between the apartment block and St. Werburghs, as per the <i>Landscape and Visual Impact Assessment</i>:</p> <p><i>“There will be substantial screening of the lower floors by existing trees and vegetation along Mountgorry Way and within the St. Werbergs site. The selection of proposed materials en façade such as buff and darker brick tones for contrast, along with and balcony breakouts, setbacks and modulations on the facades will assist in enhancing the visual interest of the built environment and reduce its overall massing. Further screening will develop during the growth season when trees are in leaf.”</i></p>
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		As such, it is considered there will be no overlooking or overbearing impact onto neighbouring properties due to the separation distances proposed and the sympathetic architectural design and modulation proposed along the façade of the building.
Objective DMSO24 – Apartment Development	<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>	Please refer to Section 5.6 of this Planning Report for details on how the proposed development accords with the <i>Sustainable Urban Housing: Design Standards for New Apartments (2023)</i> .
Section 14.7.11 – Security and Surveillance	<i>Applications for apartment developments should clearly demonstrate how matters of safety have been incorporated into the overall design. 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. This may include the provision of a defensible privacy strip, landscape planting and other measures, while ensuring appropriate levels of light ingress. Access to internal and external communal areas should also be controlled.</i>	<p>Each elevation has activation at ground level and passive surveillance at upper levels, ensuring a safe environment.</p> <p>The layout focuses activity on the streets by creating active frontages with own front door access to the units at ground floor level located at the north, east and west sides of the building. These units will be provided with a planting buffer to create a separation between the public and the private. Apartments at the upper floor level are provided with own door access via an external access deck along the northern, western and southern elevations on the courtyard.</p> <p>Residents can interact on the street, or within the enclosed courtyard in the amenity areas, or on the perimeter external walkways, which have proved to be valued by residents to support ad-hoc social interaction, providing engagement, neighbourly looking out for each other and helps perception of community and safety.</p>

<p>Section 14.7.2 – Refuse Storage in Apartment</p>	<p><i>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 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. Waste storage areas in basement car parks should be avoided where possible, but where provided, must ensure adequate manoeuvring space for collection vehicles</i></p>	<p>A central waste room is accessible to all residents from within the courtyard, ensuring secure and discrete access. A full range of recycling bins will be provided in the well-lit and ventilated space. The space is within the building footprint, ensuring it is discrete and secure.</p> <p>External doors close to the bin collection point, allow for direct access on collection of bins, without the need for moving them temporarily and risk of spillage.</p> <p>The <i>Operational Waste Management Plan</i> states each residential unit should have 3 no. internal bin types to facilitate waste segregation at source.</p> <p>A detailed sizing exercise of the communal waste room was also carried out during the design/planning stage to ensure the waste storage area can accommodate the required number of bins.</p>
<p>Objective DMSO31 – Infill Development</p>	<p><i>New infill development shall respect the height and massing of existing residential units. Infill development shall retain the physical character of the area including features such as boundary walls, pillars, gates/gateways, trees, landscaping, and fencing or railings.</i></p>	<p>Please refer to Section 7.2 of this Planning Report.</p>
<p>Objective DMSO51 – Minimum Public Open Space Provision</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>Having regard to the proposed dwelling mix (123 No. units – all 1-and-2—bed units) and the occupancy rate for dwelling set out in Objective DMSO51 (1.5-persons per dwelling), the proposed development, based on the total occupancy of 185 No. residents, should provide 0.463 Ha (463 sq m) of public open space. The proposed development seeks to provide 1,142 sq m of public open space.</p>

<p>Objective DMSO52 – Public Open Space Provision</p>	<p><i>Public open space shall be provided in accordance with Table 14.12.</i></p> <p>Table 14.12: Recommended Quantitative Standards (Sustainable Residential Developments in Urban Areas, Guidelines for Planning Authorities 2009)</p> <table border="1" data-bbox="611 312 1301 475"> <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	<p>As per Table 14.12 of the <i>Development Plan</i>, a minimum of 12% of a site area should be designated for use as public open space on infill sites. Based on the developable site area of 0.8731 Ha (8,731 sq m), the minimum public open space to be provided for the proposed development would be 1,048 sq m. The proposed development seeks to provide 1,142 sq m of public open space, which represents 13% of the developable site area and therefore exceeds the minimum requirement.</p>
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									
<p>Objective DMSO56 – Proximity of New Residential Schemes to Parks</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>The proposed apartment block is within 150 No. metres of the public open space (pocket park).</p>								
<p>Objective DMSO64 – Design of Open Space</p>	<p><i>Ensure open space provision is suitably proportioned and inappropriate narrow tracts are not provided.</i></p>	<p>The open spaces within the development are designed to be usable, accessible and well overlooked.</p>								
<p>Objective DMSO68 – Playground Facilities within Residential Development</p>	<p><i>Provide appropriately scaled children’s playground facilities within residential development. Playground facilities shall be provided at a rate of 4 sq m per residential unit. All residential schemes in excess of 50 units shall incorporate playground facilities clearly delineated on the planning application drawings and demarcated, built and completed, where feasible and appropriate, in advance of the sale of any units.</i></p>	<p>It is reasonable to exclude 1-bed units from play provision requirement and this is reiterated in the <i>Apartment Guidelines</i> which set out play provision standards for units with two bedrooms and above. Therefore, the requirement for the proposed development, based on the provision of 68 No. 2-bed units, would be 272 sq m. The proposed development seeks to provide a total of 330 sq m of play space provided within the public and communal open space and is therefore in excess of the minimum standard.</p> <p>Furthermore, we note that the proposed quantum of play provision for communal amenity space exceeds the requirements of the <i>Apartment Guidelines</i>, as demonstrated in Section 5.6 above.</p>								

Objective DMSO72 – Boundary Treatment to Private Open Space	<i>Ensure boundary treatment associated with private open spaces for all residential unit types is designed to protect residential amenity and visual amenity.</i>	The development consists exclusively of apartments and thus there are no private rear gardens with tall boundary fencing. Private terraces adjoining public realm are enclosed with low hedging to promote an appropriate level of privacy without compromising the passive surveillance these residences provide.															
Objective DMSO73 – Balconies, Roof Terraces or Winter Gardens	<p><i>Require private balconies, roof terraces or winter gardens for all apartments and duplexes comply with or exceed the minimum standards set out in Table 14.14.</i></p> <table border="1" data-bbox="607 555 1305 794"> <caption>Table 14.14: Open Space requirement for Apartment and Duplex Units</caption> <thead> <tr> <th>Unit type</th> <th>Private amenity space</th> <th>Communal amenity space</th> </tr> </thead> <tbody> <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> </tbody> </table>	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.	All apartments have a private balcony or ground terrace that exceeds the minimum areas of table 14.14 for 1-and-2-bed apartments.
Unit type	Private amenity space	Communal amenity space															
Studio	4 sq. m.	4 sq. m.															
One bed	5 sq. m.	5 sq. m.															
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Three bed	9 sq. m.	9 sq. m.															
Objective DMSO74 – Screening of Private Open Space	<i>Require balconies, ground floor private open space, roof terraces or winter gardens be suitably screened in a manner complimenting the design of the building so as to provide an adequate level of privacy and shelter for residents.</i>	Balconies are stacked to provide an enclosure overhead, and structural supports to each side help to define the space for residents. Balconies are evenly spread to avoid privacy issues with screens between adjoining balconies provided.															
Objective DMSO75 – Communal Amenity Space	<i>Require communal amenity space within apartment developments, in the form of semiprivate zones such as secluded retreats and sitting out areas, complies with or exceeds the minimum standards set out in Table 14.14.</i>	The proposed development seeks to provide 1,011 sq m of communal amenity space, with 1,032 sq m of external space and 79 sq m of internal space. The proposed quantum of communal amenity space is in excess of the minimal area required in Table 14.14 of the <i>Development Plan</i> .															
Objective DMSO78 – Community and Social Infrastructure Audit	<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</i>	A <i>Social Infrastructure Audit</i> has been prepared by Thornton O'Connor Town Planning and is submitted herewith. Please refer to Section 5.0 of the <i>Social</i>															

	<p><i>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.</i></p> <p><i>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><i>Where new community facilities are required, they shall have regard to Objective DMSO79 above and the following:</i></p> <ul style="list-style-type: none"> ➤ <i>Community facilities shall be flexible in their design and promote optimum/ multi-functional usage, for users of all age and abilities.</i> ➤ <i>Community facilities shall not have a detrimental effect on local amenity by way of traffic, parking, noise or loss of privacy of adjacent resident.</i> ➤ <i>Community facilities shall be provided in conjunction with residential/mixed use development.</i> ➤ <i>Community facilities shall be accessible by a range of travel modes with an emphasis on walking, cycling and public transport use, while providing appropriate car parking facilities to meet anticipated demand of non-local visitors to the centre.</i> 	<p>Infrastructure Audit for a summary and conclusion of the assessment.</p>
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<p>Section 14.14.2 – Childcare Facilities</p>	<p><i>The Council will seek to facilitate the provision of childcare facilities in appropriate locations throughout the County and may require their provision in large residential, public community, commercial and retail developments in accordance with the provisions of the DoEHLG Childcare Facilities: Guidelines for Planning Authorities 2001 and any superseding guidelines or as required by the Planning Authority.</i></p>	<p>A Childcare Demand Assessment has been prepared by Thornton O'Connor Town Planning and is submitted herewith. The following provides the conclusion of the assessment:</p> <p><i>“In our opinion, there is sufficient existing provision of childcare infrastructure in the vicinity of the subject site (i.e., within c. 2 km radius) to support the proposed development. As the above survey demonstrates, there is an adequate supply of facilities within walking available to local residents offering a higher-than-average per capita ratio of childcare places. While there was no material level of vacancy identified within existing childcare facilities <u>the size of the proposed development is unlikely to impact on the quality of services and facilities currently available in the locality.</u>” [Author’s Emphasis]</i></p>
<p>Objective DMSO105 – Development within Airport Noise Zones</p>	<p><i>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.</i></p>	<p>The Noise & Vibration Impact Assessment makes note of the proposed development being situated in Zone D. Noise levels outlined as being associated with airport noise Zone D in combination with traffic noise levels have been used to inform the inward noise impact assessment.</p>
<p>Objective DMSO111 – Mobility Management Plan</p>	<p><i>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</i></p>	<p>A Mobility Management Plan has been prepared by OCSC Consulting Engineers and is submitted herewith. It includes</p>

	<i>development management process. This requirement includes existing developments that are expanding or intensifying their use.</i>	a series of soft and hard measures to facilitate a high modal share for sustainable and active travel modes.												
Objective DMSO112 – Bicycle Maintenance Facilities	<i>Require bicycle maintenance facilities wherever a mobility management plan is in place.</i>	A maintenance hub is provided in one of the larger bike stores.												
Objective DMSO113 – Traffic and Transport Assessment	<i>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.</i>	A <i>Traffic Assessment & Parking Strategy</i> has been prepared by OCSC Consulting Engineers and is submitted herewith. This concluded that the impact of the proposed development will have a negligible impact on the local road network. The proximity of local amenities and services in Swords will reduce the need to travel by car and the site will benefit from future high-capacity public transport services in the form of MetroLink.												
Objective DMSO118 – Road Safety Measures	<i>Promote road safety measures in conjunction with the relevant stakeholders and avoid the creation of traffic hazards.</i>	The layout has been designed to prioritise vulnerable and active users i.e. pedestrians and cyclists. The extent of roads has been reduced to the lowest degree possible and bespoke and segregated facilities have been provided for pedestrians and cyclists fully in compliance with the <i>Cycle Design Manual</i> and <i>DMURS</i>. Pedestrians and cyclists have also been prioritised at points of interaction with vehicles including the entrance.												
Table 14.19 – Car Parking Standards	<table border="1"> <thead> <tr> <th>Land Use Category</th> <th colspan="2">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***</th> </tr> </thead> <tbody> <tr> <td>Residential</td> <td></td> <td></td> </tr> <tr> <td>Residential (1-2 Bedroom)</td> <td>0.5</td> <td>Max</td> </tr> <tr> <td>Residential (3-3+ Bedroom)</td> <td>1</td> <td>Max</td> </tr> </tbody> </table>	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***		Residential			Residential (1-2 Bedroom)	0.5	Max	Residential (3-3+ Bedroom)	1	Max	Please refer to Section 7.3.4 of this Planning Report and the accompanying <i>Traffic Assessment & Parking Strategy</i> for the justification on the proposed quantum of car parking.
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***													
Residential														
Residential (1-2 Bedroom)	0.5	Max												
Residential (3-3+ Bedroom)	1	Max												
Section 14.17.9 – Motorcycle Parking	<i>Parking spaces should be provided on the basis of one motorcycle parking bay per 10 car parking spaces provided for non residential developments and apartment</i>	Based on the provision of 24 No. car parking spaces, the motorcycle parking requirement is 2 No. spaces. The proposed development provides 2 No. motorcycle parking												

	<i>developments. Spaces should be provided in locations convenient to building access points, similar to cycle parking requirements.</i>	spaces located to the north-west of the car parking area and is therefore in accordance with Section 14.17.9 of the <i>Development Plan</i> .
Section 14.17.10 – Electric Vehicle Parking	<p><i>To encourage the use of Electric Vehicles (EVs), developments shall provide the following minimum standards for EV charging points and infrastructure:</i></p> <ul style="list-style-type: none"> ➤ <i>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> 	There are 6 No. EV parking spaces proposed for the development, which is 25% of the total car parking proposed. All other spaces will be provided with infrastructure such as ducting to ensure these spaces can be provided with charging points in the future.
Objective DMSO125 – Management of Trees and Hedgerows	<i>Protect, preserve and ensure the effective management of trees and groups of trees and hedgerows.</i>	<p>A total of 4 No. trees are to be removed on site to cater for the proposed drainage services, new pedestrian footpath and cycle lane, and fire tender circulation. There will be a significant quantum of replacement trees and planting to ensure a greater range in biodiversity and visual amenity than what is currently provided. As stated in the accompanying <i>Arboricultural Assessment & Impact Report</i>:</p> <p><i>“A diverse range of tree species and cultivars are proposed within the landscape masterplan for the site. This will increase overall numbers of trees from current levels and provide a greater range of ecosystem services than currently provided by the existing tree population. In terms of mitigation it is considered that the proposed planting more than compensates for trees to be removed.”</i></p>
Objective DMSO127 – Use of Native Species in New Developments	<i>Require the use of native species where appropriate in new developments in consultation with the Council.</i>	The proposed planting includes a high proportion of native tree species.

Objective DMSO129 – Tree Selection	<i>Consider in tree selection the available rooting area and proximity to dwellings or business premises particularly regarding shading of buildings and gardens.</i>	In proposing tree planting for the development, the Landscape Architects have had regard to available rooting area and proximity to buildings.
Objective DMSO130 – Planting of Large Canopy Trees	<i>Promote the planting of large canopy trees on public open space and where necessary provide for constructed tree pits as part of the landscape specification.</i>	Large canopy trees are proposed within the public open space.
Objective DMSO131 – Street Tree Planting Plans	<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>	Where provided in the development street trees are within larger planting beds wider than 1.2metres.
Objective DMSO133 – Location of new Trees	<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>	In proposing tree planting for the development, the Landscape Architects have had regard to the locations of existing and proposed street lighting to avoid future interference.
Objective DMSO137 – Replacement of Removed Trees	<i>Ensure trees removed from residential areas are replaced, where appropriate, within the first planting season following substantial completion of construction works.</i>	Proposed planting will be subject of a defects liability period to ensure any trees that fail are replaced.
Objective DMSO138 – Protection and Enhancement of Biodiversity	<i>Ensure all development and infrastructure proposals include measures to protect and enhance biodiversity leading to an overall net biodiversity gain.</i>	The proposed development incorporates a range of measures to protect and enhance biodiversity including: as much tree retention as possible, green roofs, native tree planting, pollinator friendly planting, nature based solutions (SuDS) and meadow grassland.
Objective DMSO139 – Ecological Study	<i>Ensure that an ecological study is carried out of the development site covering habitats and flora, breeding</i>	Please see <i>Ecological Impact Assessment Report</i> for further details of existing site ecology.

	<i>birds, bats and amphibians to identify existing ecological valuable features and the species composition of the site.</i>	
Objective DMSO140 – Protection of Existing Landscape	<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>	The proposed development protects and enhances the tree belt along the western boundary and any trees proposed to be removed are absolutely necessary to facilitate drainage services, the improved footpath and cycle lane along the southern boundary of the site, and to facilitate sufficient space for fire tender circulation.
Objective DMSO141 – Incorporation of Habitat Features	<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>	The ecological corridor along the west of the site will be bolstered by planting, with tree protection measures to be put in place during construction works. Additional ecological enhancement measures outlined in the <i>Ecological Impact Assessment Report</i>.
Objective DMSO143 – Habitat Facilities for Wildlife Species	<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>	The integration of swift boxes, bat boxes, and pollinator habitat, along with additional ecological enhancement measures are outlined in the <i>Ecological Impact Assessment Report</i>.
Objective DMSO144 – Appropriate Assessment	<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>	An <i>Appropriate Assessment Screening Report</i> has been prepared by Enviroguide Consulting and is submitted herewith.
Objective DMSO145 – Screening for Appropriate Assessment	<i>Ensure that sufficient information is provided as part of development proposals to enable Screening for Appropriate Assessment to be undertaken and to enable a fully informed assessment of impacts on biodiversity to be made.</i>	An <i>Appropriate Assessment Screening Report</i> has been prepared by Enviroguide Consulting and is submitted herewith.
Objective DMSO148 – Ecological Impact Assessment	<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</i>	An <i>Ecological Impact Assessment Report</i> has been prepared by Enviroguide Consulting and is submitted herewith.

	<i>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>	
Objective DMSO150 – External Lighting and Noise at Sensitive Locations	<i>Minimise the environmental impact of external lighting and noise at sensitive locations to achieve a sustainable balance between the needs of an area, the public safety of walking and cycling routes and the protection of sensitive species such as bats.</i>	The ecological corridor along the west of the site will be maintained as a dark corridor for the protection of sensitive species such as bats.
Objective DMSO151 – Fingal Biodiversity Action Plan	<i>Applicants should consult the Fingal Biodiversity Action Plan to ascertain its implications for any planning proposals.</i>	The <i>Fingal Biodiversity Action Plan</i> was reviewed during the preparation of the <i>Appropriate Assessment Screening Report</i> and <i>Ecological Impact Assessment Report</i>.
Objective DMSO162 – Landscape / Visual Assessment	<i>Require a landscape/Visual assessment to accompany all planning applications for significant proposals that are likely to affect views and prospects.</i>	A <i>Landscape and Visual Impact Assessment</i> accompanies this application.
Objective DMSO196 – Public Foul Sewerage Network Connections	<i>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>	The foul sewerage network has been designed fully in accordance with Uisce Éireann requirements and includes a connection to the public network. A Confirmation of Feasibility and Statement of Design Acceptance has been received which confirms capacity in the local network to accommodate the development. The Confirmation of Feasibility is attached as Appendix C to the <i>Engineering Services Report</i>.
Objective DMSO197 – Foul and Surface Water Drainage Systems	<i>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>	Fully separate surface water and foul sewerage networks have been designed to serve the proposed development as well as separate connections to the respective public networks. Refer to the <i>Engineering Services Report</i> for further detail.

<p>Objective DMSO202 – SuDS</p>	<p><i>SuDS shall incorporate nature-based solutions and have regard to the objectives set out in Fingal’s Guidance Document – Green/ Blue Infrastructure for Development, as amended. (Appendix 11).</i></p>	<p>The development includes a comprehensive surface water design and strategy which prioritises nature based and above ground measures wherever possible such as detention basins, extensive blue roofs, permeable paving etc. This have been co-ordinated with a high-quality landscape design to ensure SuDS measures incorporated into open space areas are of the highest quality and remain functional for this purpose. The network has been fully modelled in Causeway Flow to ensure it operates to the required level. Please refer to the submitted <i>Engineering Services Report</i> for full detail.</p>
<p>Objective DMSO203 – FCC SuDS Guidance Document</p>	<p><i>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:</i></p> <ul style="list-style-type: none"> ➤ <i>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.</i> ➤ <i>Open space areas shall not be dominated by SuDS features.</i> ➤ <i>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.</i> <p><i>See also Appendix 11 (SuDS Guidance Document) and Chapter 11, Infrastructure and Utilities (Section 11.5.2: Surface Water and Flood Risk Management).</i></p>	<p>Please refer to response to Objective DMSO202.</p>
<p>Objective DMSO205 – Surface Water Management Plan</p>	<p><i>Require the preparation of a Surface Water Management Plan as part of all new developments which shall include the following:</i></p>	<p>A ‘Surface Water Management Design Statement’ is attached as Appendix D to the submitted <i>Engineering Services Report</i>.</p>

	<ul style="list-style-type: none"> ➤ 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). ➤ Incorporate SuDS along the route of the water movement to enhance the water quality effects of nature-based systems at the different stages – Treatment Train approach from source to discharge 	
Objective DMSO206 – Green Roofs	Require the use of green roofs particularly on apartment, commercial, leisure and educational buildings as part of the overall surface water management strategy for each development, where appropriate.	Extensive blue and green roofs are proposed across the apartment block roof levels, where not conflicting with proposed constraints such as PV panels. Please refer to the submitted <i>Engineering Services Report</i> for further detail.
Objective DMSO207 – Green Walls and Roofs for New Developments	Promote and encourage the use of green walls and roofs for new developments that demonstrate benefits in terms of SuDS as part of an integrated approach to green infrastructure provision.	Extensive blue and green roofs are proposed across the apartment block roof levels, where not conflicting with proposed constraints such as PV panels. Please refer to the submitted <i>Engineering Services Report</i> for further detail.
Objective DMSO212 – OPW Flood Risk Management Guidelines	Have regard to the OPW Flood Risk Management Guidelines 2009, as revised by Circular PL 2/2014, when assessing planning applications and in the preparation of statutory and non-statutory plans and to require site specific flood risk assessments be considered for all new developments within the County. All development must prepare a Stage 1 Flood Risk Analysis and if the flooding risk is not screened out, they must prepare a Site Specific Flood Risk Assessment (SSFRA) for the development, where appropriate.	A Site Specific Flood Risk Assessment has been carried out for the development and can be found in the submitted <i>Engineering Services Report</i> . It concluded that the development lies outside of Flood Zones A and B meaning it is low risk and the type of use proposed is appropriate as per the PRFM Guidelines.
Objective DMSO215 – Precautionary Principle and Flood Risk	Require all developments in the County to be designed and constructed in accordance with the Precautionary Principle as detailed in the OPW Guidelines and to minimise the flood risk in Fingal from all potential sources of flooding as far as	A Site Specific Flood Risk Assessment has been carried out for the development and can be found in the submitted <i>Engineering Services Report</i> .

	<i>is practicable, including coastal, pluvial, fluvial, reservoirs and dams, and the piped water system.</i>	
Objective DMSO216 – Taking in Charge of new Surface Water Infrastructure	<i>Require that all new surface water infrastructure within public or private developments be constructed in accordance with the standards set out within the Greater Dublin Regional Code of Practice for Drainage Works, as amended, irrespective of the management and maintenance regime proposed for the development or whether or not the development is intended to be taken in charge, in full or in part (i.e. infrastructure shall be to designed to taking in charge standards).</i>	The development surface water network is designed to be fully compliant with the Greater Dublin Regional Code of Practice for Drainage Works. Refer to the <i>Engineering Services Report</i> for further detail.
Objective DMSO217 – Requirements for the Design, Construction and Taking in Charge of New Development	<i>Ensure that the applicant / developer understands the requirements for the design, construction and taking in-charge of new development.</i>	The development surface water network is designed to be fully compliant with the Greater Dublin Regional Code of Practice for Drainage Works and Uisce Eireann standards. Refer to the <i>Engineering Services Report</i> for further detail.
Objective DMSO230 – Undergrounding of Cables	<i>Seek the placing underground of all electricity, telephone, utility and TV cables in urban areas. It is the intention of the Council to co-operate with other agencies as appropriate, and to use its Development Management powers in the implementation of this policy.</i>	Local utility services such as electricity, telephone and television cables will be located underground in line with EIR, Virgin and ESB requirements.
Objective DMSO235 – Communal Refuse Storage Provision	<i>In the case of communal refuse storage provision, the collection point for refuse should be accessible both to the external collector and to the resident and be secured against illegal dumping by non-residents. In the case of individual houses, the applicant shall clearly show within a planning application the proposed location and design of bin storage to serve each dwelling, and having regard to the number of individual bins required to serve each dwelling at the time of the application and any possible future requirements for refuse storage/collection.</i>	<p>The <i>Operational Waste Management Plan</i> highlights the locations of the communal waste storage area, and the area bins will be staged for collection.</p> <p>The <i>Operational Waste Management Plan</i> states that only residents and the selected waste contractors should have access to the waste storage area.</p> <p>The <i>Operational Waste Management Plan</i> also lists the following requirements for the waste storage area:</p>

	<p>The following criteria will be considered in the assessment of the design and siting of waste facilities and bring facilities:</p> <ul style="list-style-type: none"> ➤ The location and design of any refuse storage or recycling facility should ensure that it is easily accessible both for residents and/or public and for bin collection, be insect and vermin proofed, will not present an odour problem, and will not significantly detract from the residential amenities of adjacent property or future occupants. ➤ Provision for the storage and collection of waste materials shall be in accordance with the guidelines for waste storage facilities in the relevant Regional Waste Management Plan and the design considerations contained in Section 4.8 and 4.9 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, DHLGH 2020. ➤ Refuse storage for houses should be externally located, concealed / covered and adequate to cater for the size and number of bins normally allocated to a household. For terraced houses, the most appropriate area for bins to be stored is to the front of the house, which should be located in well-designed enclosures that do not detract from visual amenity. ➤ All applications shall clearly identify the waste storage and collection points and detail the anticipated waste collection schedule having regard to the impact on road users both within the development and the surrounding area. ➤ Access to private waste storage in residential schemes should be restricted to residents only. 	<ul style="list-style-type: none"> - Provide ventilation to reduce the potential for generation of odours with a recommended 6-10 air changes per hour for a mechanical system for internal WSAs; - Provide suitable lighting – a minimum Lux rating of 400 is recommended; - Be easily accessible for people with limited mobility; - Be restricted to access by nominated personnel only; - Be supplied with hot or cold water for disinfection and washing of bins; - Be fitted with suitable power supply for power washers; - Have a sloped floor to a central foul drain for bins washing run-off; - Have appropriate signage placed above and on bins indicating correct use; - Have access for potential control of vermin, if required; - Be fitted with CCTV for monitoring; and - Be fitted with a non-slip floor surface. <p>The <i>Operational Waste Management Plan</i> also includes a waste vehicle tracking that demonstrates the movements of the waste vehicle during collection.</p> <p>A detailed sizing exercise of the communal waste room and staging/collection point was also carried out during the design to ensure the waste storage area and staging collection can accommodate the required number of bins.</p>
<p>Objective DMSO236 – Segregation and Collection of Waste</p>	<p>Ensure all new large-scale residential and mixed-use developments include appropriate facilities for source segregation and collection of waste.</p>	<p>The <i>Operational Waste Management Plan</i> states each residential unit should have 3 No. bin types to facilitate waste segregation at source and the Waste Storage area</p>

		<p>will provide a minimum of 4 No. bin types (General, recycling, organic and glass).</p> <p>Bins in the communal waste storage area must have appropriate signage placed above and on bins indicating correct use.</p>
Objective DMSO237 – Distance from Front Door to Communal Bin Area	<i>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>The Operational Waste Management Plan highlights the locations of the communal waste storage area.</p> <p>A detailed sizing exercise of the communal waste room was carried out during the initial design stage to ensure the waste storage area can accommodate the required number of bins.</p>
Objective DMSO238 – Maximum Distance Communal Bin Area	<i>Ensure the maximum distance between the front door to a communal bin area does not exceed 50 metres.</i>	Residents on the south and west side of the development will have access to the communal waste storage area through internal hallways and the communal open space area.
Objective DMSO239 – Refuse Storage Areas	<i>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 or other such mitigation measures are provided.</i>	<p>A detailed sizing exercise of the communal waste room was also carried out during the initial design stage to ensure the waste storage area can accommodate the required number of bins.</p> <p>Please see the list of design requirements for the waste storage area in the response to Objective DMSO235 above, as stated in the Operational Waste Management Plan.</p>
Objective DMSO240 – Distance to Communal Bin Areas	<i>Ensure the maximum distance between the front door to a communal bin area does not exceed 50 metres.</i>	Residents on the south and west side of the development will have access to the communal waste storage area through internal hallways and the communal open space area.

<p>Objective DMSO241 – Construction and Demolition Waste Management Plan</p>	<p><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 1,250 sqm.</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>A Resource Waste Management Plan has been prepared by AWN Consulting and submitted herewith.</p>
<p>Objective DMSO242 – Guidance for Construction and Demolition Waste Management Plans</p>	<p><i>Require that Construction and Demolition Waste Management Plans include the following:</i></p> <ul style="list-style-type: none"> ➤ <i>Hours of operation.</i> ➤ <i>Construction/phasing programme.</i> ➤ <i>Traffic Management Plan including employee parking and movements.</i> ➤ <i>Noise, Vibration, Air Quality and Dust Monitoring and Mitigation Measures.</i> ➤ <i>Details of any construction lighting including appropriate mitigation measures for lighting specifically designed to minimise impacts to biodiversity, including bats.</i> ➤ <i>The management of construction and demolition waste included as part of a Construction and Demolition Waste Management Plan.</i> ➤ <i>Containment of all construction-related fuel and oil within specially constructed bunds to ensure that fuel spillages are fully contained (such bunds shall be roofed to exclude rainwater).</i> 	<p>These items have been addressed in the accompanying Construction Environmental Management Plan prepared by AWN Consulting.</p>

	<p>➤ <i>A water and sediment management plan, providing for means to ensure that surface water runoff is controlled such that no silt or other pollutants enter local water courses or drains.</i></p>	
Objective DMSO248 – Design of Lighting Schemes	<p><i>Require that the design of lighting schemes minimises the incidence of light spillage or pollution into the surrounding environment. New schemes shall ensure that there is no unacceptable adverse impact on neighbouring residential or nearby properties; visual amenity and biodiversity in the surrounding areas.</i></p>	<p>An <i>External Public Lighting Report</i> has been prepared by J.V. Tierney & Co and is submitted herewith, which demonstrates how the proposed developments lighting will be installed to minimise light spillage.</p>
Objective DMSO261 – Climate Action Energy Statements	<p><i>All new developments involving 15 residential units and/or more than 1,000 sq. m. of commercial floor space, or as otherwise required by the Planning Authority, will be required to submit a Climate Action Energy Statement as part of the overall Design Statement to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development.</i></p>	<p>A <i>Climate Action Energy Statement</i> has been prepared by J.V. Tierney & Co and is submitted herewith.</p>

7.5 Concluding Remarks

As discussed above, the proposed development to provide 123 No. residential units, residents' amenity space, public and communal open spaces, car and cycle parking and other aspects of the development, fully accords with the policies and objectives set out in the *Development Plan*.

It is considered that the proposed development maximises the potential of the subject site in the interest of sustainable development and having regard to the location of the site in close proximity to high-frequency public transport and the proposed MetroLink, employment locations, services and facilities. The proposed development seeks to respond positively to the characteristics of the site and surrounding context by providing higher-density housing on a large area of underutilised plot of land.

8.0 PLANNING ADMINISTRATION

The following plans and particulars are enclosed as part of this application:

Planning Fee

- EFT made payable to *Fingal County Council* in the sum of **€15,990** (representing the planning application fee payable in accordance with Schedule 9 of the *Planning and Development Regulations 2001* (as amended). Confirmation of payment for the application fee is attached as Appendix D to the accompanying Fingal County Council LRD Planning Application Form.

The Planning Fee is calculated as follows:

Class	Calculation	Amount
Class 14	€130 x 123 No. Units	€15,990
Total		€15,990

Planning Report

- This *Planning Report and Statement of Consistency*, prepared by Thornton O'Connor Town Planning, dated 26th September 2024.

Response to Opinion

- The *Response to Fingal County Council's Opinion*, prepared by Thornton O'Connor Town Planning, dated September 2024.

Planning Application Form

- The Planning Application Form is auto-generated as part of the online planning submission.
- A duly completed current Fingal County Council LRD Planning Application Form (Form 19), signed and dated 26th September 2024, with the following attached as Appendices:
 - Appendix A - Details of S. 247 Pre-Planning Meeting & S. 32C LRD Meeting with Fingal County Council;
 - Appendix B – Confirmation Letter from Bartra Propco No. 23 Limited Regarding Legal Rights and Easements Over Access Road to East;
 - Appendix C – List of Drawings Enclosed; and
 - Appendix D – Proof of Application Fee Payment.

Notices

- A copy of a scanned page of the *Irish Daily Star* dated 25th September 2024 in which notice of the application has been published pursuant to article 17(1)(a) of the *Planning and Development Regulations, 2001* (as amended).
- A copy of the Site Notice dated 25th September 2024 and erected or fixed on the land or structure pursuant to article 17(1)(b) of the *Planning and Development Regulations, 2001* (as amended).

Architecture

- The *Architectural Design Statement* (Part 1 of 2) prepared by Coady Architects, dated September 2024.
- The *Architectural Design Statement* (Part 2 of 2) prepared by Coady Architects, dated September 2024.
- The *Housing Quality Assessment* prepared by Coady Architects, dated 23rd August 2024.
- The *Schedule of Accommodation* prepared by Coady Architects, dated 23rd August 2024.
- The following Drawings prepared by Coady Architects:

Drawing No.	Drawing Title	Scale	Size
0502	Site Location Plan	1:1,000	A3
0503	Site Layout Plan	1:500	A1
Combined Site Layout Plans			
0501	Existing Site Plan	1:200	A1
0524	Proposed Open Space	1:500	A1
0525	Taking in Charge	1:500	A1
0520	Site Layout Plan – Ground Floor	1:200	A1
Combined Floor Plans			
0504	Gross Floor Area By Level	1:500	A1
0505	Gross Floor Internal Area Schedule	1:500	A1
0506	GA Plan – 00 – Ground Floor	1:200	A1
0507	GA Plan – 01 – First Floor	1:200	A1
0508	GA Plan – 02 – Second Floor	1:200	A1
0509	GA Plan – 03 – Third Floor	1:200	A1
0510	GA Plan – 04 – Fourth Floor	1:200	A1
0511	GA Plan – RF – Roof Level	1:200	A1
0515	Apartment Layout Type Plans Sheet 1	1:50	A1
0516	Apartment Layout Type Plans Sheet 2	1:50	A1
0521	Apartment Layout Type Plans Sheet 3	1:50	A1
0522	Apartment Layout Type Plans Sheet 4	1:50	A1
0523	Bike Store Layout	1:50	A1

Combined Elevations and Sections			
0512	North, South, East & West Elevations	1:200	A1
0513	North, South, East & West Courtyard Elevations	1:200	A1
0514	North, South, East & West Contextual Elevations	1:200	A1
Combined Part V Plans			
0517	GA Plan – 00 – Ground Floor – Part V	1:200	A1
0518	GA Plan – 01 – First Floor – Part V	1:200	A1
0526	GA Plan – 02 – Second Floor – Part V	1:200	A1
0527	GA Plan – 03 – Third Floor – Part V	1:200	A1

Engineering

- The *Engineering Services Report* prepared by O'Connor Sutton Cronin Multidisciplinary Consulting Engineers, dated 25th September 2024.
- The following Drawings prepared by O'Connor Sutton Cronin Multidisciplinary Consulting Engineers:

Drawing No.	Drawing Title	Scale	Size
B1054-OCSC-XX-XX-DR-C-0500	Proposed Drainage Layout	1:250	A1
B1054-OCSC-XX-XX-DR-C-0510	Proposed Wastewater Long Sections	1:500	A1
B1054-OCSC-XX-XX-DR-C-0511	Proposed Surface Water Long Sections	1:500	A1
B1054-OCSC-XX-XX-DR-C-0550	Proposed Watermain Layout	1:200	A1

Traffic

- The *Traffic Assessment & Parking Strategy* prepared by O'Connor Sutton Cronin Multidisciplinary Consulting Engineers, dated 20th September 2024.
- The *DMURS Statement of Consistency* prepared by O'Connor Sutton Cronin Multidisciplinary Consulting Engineers, dated 20th September 2024.
- The *Mobility Management Plan* prepared by O'Connor Sutton Cronin Multidisciplinary Consulting Engineers, dated 20th September 2024.
- The *Stage 1 Road Safety Audit* prepared by Traffico Road Safety Engineering, dated September 2024.
- The following Drawings prepared by O'Connor Sutton Cronin Multidisciplinary Consulting Engineers:

Drawing No.	Drawing Title	Scale	Size
B1054-OCSC-XX-XX-DR-C-0110	Roads General Arrangement	1:200	A1
B1054-OCSC-XX-XX-DR-C-0111	Road Buildup	1:10	A1

B1054-OCSC-XX-XX-DR-C-0115	Visibility Splay at Junction	1:100	A1
B1054-OCSC-XX-XX-DR-C-0140	Swept Path Analysis Large Car Ingress & Egress	1:200	A1
B1054-OCSC-XX-XX-DR-C-0141	Autotrack Swept Path Analysis Refuse Truck at Entrance	1:100	A1
B1054-OCSC-XX-XX-DR-C-0142	Autotrack Swept Path Analysis Fire Tender	1:100	A1
B1054-OCSC-XX-XX-DR-C-0143	Autotrack Swept Path Analysis Delivery Van	1:100	A1

Landscape

- The *Landscape Report* prepared by Áit Urbanism + Landscape, dated 20th September 2024.
- The following Drawings prepared by Áit Urbanism + Landscape:

Drawing No.	Drawing Title	Scale	Size
23FG03-DR-0200	Landscape Masterplan	1:250	A1
23FG03-DR-0210	Landscape Masterplan with Combined Services	1:250	A1
23FG03-DR-0500	Boundary Treatments	As Shown	A1
23FG03-DR-0401	Landscape Sections 1 of 5	1:100	A3
23FG03-DR-0402	Landscape Sections 2 of 5	1:100	A3
23FG03-DR-0403	Landscape Sections 3 of 5	1:100	A3
23FG03-DR-0404	Landscape Sections 4 of 5	1:100	A3
23FG03-DR-0405	Landscape Sections 5 of 5	1:100	A3

Mechanical & Electrical

- The *Climate Action Energy Statement* prepared by J.V. Tierney & Co Mechanical Electrical & Sustainable Engineers.
- The *External Public Lighting Report* prepared by J.V. Tierney & Co Mechanical Electrical & Sustainable Engineers.
- The following Drawing prepared by J.V. Tierney & Co Mechanical Electrical & Sustainable Engineers:

Drawing No.	Drawing Title	Scale	Size
MOU-JVT-ZZ-SI-DR-E-6000	Electrical Services Existing ESNB Utility Services	1:250	AoL
MOU-JVT-ZZ-SI-DR-E-6001	Electrical Services ESNB Utility Services Proposed Alteration	1:20	AoL
MOU-JVT-ZZ-SI-DR-E-6002	Electrical Services Public Lighting	1:250	A1L

Arboriculture

- The *Arboricultural Assessment & Impact Report* prepared by CMK Hort + Arb Ltd.
- The following Drawing prepared by CMK Hort + Arb Ltd.:

Drawing No.	Drawing Title	Scale	Size
101	Arboricultural Assessment & Constraints	1:250	A2
102	Arboricultural Impact	1:250	A2
103	Tree Protection	1:250	A2

Environmental & Ecology

- The *Appropriate Assessment Screening Report* prepared by Enviroguide Consulting, dated September 2024.
- The *Ecological Impact Assessment Report* prepared by Enviroguide Consulting, dated September 2024.
- The *Environmental Impact Assessment Screening Report* prepared by Enviroguide Consulting, dated September 2024.
- The *Statement in accordance with Article 103(1A)a of the Planning and Development Regulations 2001, as amended* prepared by Enviroguide Consulting, dated September 2024.

Waste Management

- The *Construction & Environmental Management Plan* prepared by AWN Consulting, dated 24th September 2024.
- The *Operational Waste Management Plan* prepared by AWN Consulting, dated 24th September 2024.
- The *Resource and Waste Management Plan* prepared by AWN Consulting, dated 24th September 2024.

Daylight & Sunlight

- The *BRE Daylight & Sunlight Assessment* prepared by J.V. Tierney & Co Mechanical Electrical & Sustainable Engineers.

Landscape & Visual Impact

- The *Landscape and Visual Impact Assessment* prepared Áit Urbanism + Landscape, dated 20th September 2024.

Noise

- The *Noise & Vibration Impact Assessment* prepared by Awn Consulting, dated 23rd September 2024.

Telecommunications

- The *Telecommunications Impact Assessment Report* prepared by Independent Site Management, dated 23rd September 2024.

Photomontages

- The *Verified Photomontages and CGIs* prepared by Model Works, dated September 2024.

Childcare

- The *Childcare Demand Assessment* prepared by Thornton O'Connor Town Planning, dated September 2024.

School Demand

- The *School Demand Assessment* prepared by Thornton O'Connor Town Planning, dated September 2024.

Social Infrastructure

- The *Social Infrastructure Audit* prepared by Thornton O'Connor Town Planning, dated September 2024.

Building Lifecycle

- The *Life Cycle Report* prepared by Coady Architects, dated August 2024.

Part V

- The Part V Costings that were submitted to the Housing and Community Department of Fingal County Council.
- The Validation Letter received from the Housing and Community Department of Fingal County Council, dated 19th September 2024.

9.0 CONCLUSION

Overall, it is our professional opinion that the proposed development will provide critically needed housing and will successfully assimilate into the surrounding context. The principal goal of the subject development, which seeks to provide 123 No. residential units on this key underutilised, infill site in Swords is to increase the supply of housing on a strategically located plot of land and open up the site to the wider community through the provision of public open space and connections to the public open space to the west and the employment lands to the north.

The proposed development, which has been well considered by a highly experienced Design Team and design to accord with National, Regional, and Local Level Planning Policy, will provide a high-quality living environment that provides opportunities of social interaction amongst future residents and the wider community. As such, it is considered that the proposed development represents the proper planning and sustainable development of the area.

We trust you will find this application in order. Please do not hesitate to contact the undersigned should you require any further information or clarification on the proposal.

Yours Sincerely,

Patricie Thornton

Patricia Thornton
Director
Thornton O'Connor Town Planning