



An
Bord
Pleanála

**Case Reference:
ABP-304421-19**

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

**Proposed Development: 624 no. residential units and associated site works.
Holybanks, Swords, Co. Dublin.**

An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.

An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.

1. Timing and Phasing of Development

Further consideration of documents as they relate to the planning rationale for developing at this location having specific regard to the possible prematurity of development pending the provision of Metrolink, provision of infrastructure as set out in the draft Estuary West Masterplan and the completion by Irish Water of an assessment regarding the upgrading of the surface water network. Further

consideration of these issues may require an amendment to the documents and/or design proposals submitted.

2. Surface water management and Flood Risk

Further consideration of documents as they relate to the design rationale/justification for the proposed development strategy of the lands as they relate to surface and storm water management for the development lands and the risk for displaced or increased discharge of waters downstream in the Broadmeadow River and the identification of a portion of the site on Flood Zone B lands. Any surface water management proposals should be considered in tandem with any Flood Risk Assessment, which should in turn accord with the requirements of 'The Planning System and Flood Risk Management Guidelines' (including the associated 'Technical Appendices') and include hydraulic modelling where considered appropriate. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

3. Traffic and Transportation

Further consideration of documents as they relate to the delivery and timing of road infrastructure upgrades in the wider area as identified in the draft Estuary West Masterplan to facilitate the proposed development including connectivity of the proposed development to the existing Applewood main street urban centre, the proposed linear park and the school site. Further consideration of how the layout, future connections and access arrangements are consistent with the principles of Design Manual for Urban Roads and Streets should be provided. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted.

4. Green Infrastructure

Further consideration and/or justification of the documents as they relate to the consideration of Green Infrastructure and the provision of green corridors and public open space along the Broadmeadow River and additional green corridors north-

south through the development lands including accessibility for pedestrians and cyclists and passive surveillance to these areas.

Further consideration should be given to the proposed landscaping plan and the hierarchy, function and usability of public open spaces including the use/linking of green corridors throughout the scheme. All proposed SUDs features should be clearly identified on a site layout plan with proposals as to how the features will enhance/contribute to a sense of place. Computer Generated Images and long cross-sections should be submitted to show changes in levels and inter alia, the interface of boundary treatments and SUDs to public open spaces/streetscape.

Consideration should also be given to the existing biodiversity value of the site and retention of movement corridors through the proposed scheme for wildlife and any potential impact on same arising from proposed lighting scheme. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

5. Urban Design Response, Layout and Density

Further consideration and/or justification of the documents as they relate to the rationale of the proposed residential layout and urban design response with particular regard to the creation of distinct neighbourhood areas within the overall site, the creation of active and aesthetically pleasing urban street frontages having particular regard to the site context and presence of High Amenity lands to the north of the development lands, and how the proposed elevational treatments respond to the site context particularly the interface with Jugback lane to ensure a qualitative design response with optimal passive surveillance of streets and public and private open spaces throughout the scheme.

Further consideration should be given to the 12 criteria set out in the Urban Design Manual which accompanies the Sustainable Residential Development in Urban Areas Guidelines and also reference to the Design Manual for Urban Roads and Streets.

Consideration should be given to the proposed density having regard to inter alia local planning policy context for the subject lands which outlines a net range of

between 70-75 units per hectare. Further consideration of these issues may require an amendment to the documents and/or design proposals submitted.

Furthermore, Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission:

1. Details demonstrating that the qualitative and quantitative standards of the proposed residential units having specific regard to the provisions of Specific Planning Policy Requirements contained in inter alia the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, 2018.
2. Details of any consultations undertaken with the Department of Education and Skills with regard to the reservation of lands for a school as identified in the Estuary West Masterplan.
3. Details of existing and proposed changes in contours/levels across the site. Photomontage images and cross-sections at appropriate intervals to illustrate the topography of the site, showing proposed residential units, access roads including the lands identified for a school and public open space areas.
4. An Appropriate Assessment screening report and/or Natura Impact Statement if considered necessary, which should consider inter alia the issue of surface water run-off and in-combination effects of relevant Natura 2000 sites.
5. Details of undergrounding or re-routing of any utilities that may exist on site.

6. A site layout plan indicating pedestrian and cycle connections through the development lands to existing and proposed transport modes in the vicinity. Connections from surrounding areas through the subject site should also be indicated.
7. A construction and demolition waste management plan should be provided.
8. A phasing plan for the proposed development which clearly indicates the extent of transport infrastructural upgrades, social and community infrastructure including Part V units that it is proposed to deliver in each phase having specific regard to the provisions of the local area plan.
9. A site layout plan indicating all areas to be taken in charge.
10. A Building Life Cycle Report in respect of the proposed apartments as per section 6.13 of Sustainable Urban Housing: Design Standards for New Apartments- Guidelines for Planning Authorities (2018).

Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that the following authorities should be notified in the event of the making of an application arising from this notification in accordance with section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

1. Irish Water
2. The Minister for Arts, Heritage, Regional, Rural and Gaeltacht Affairs
3. The Heritage Council
4. An Taisce – the National Trust for Ireland
5. Transport Infrastructure Ireland
6. National Transport Authority
7. Local Childcare Committee

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Tom Rabbette

Assistant Director of Planning

,2019