



An  
Bord  
Pleanála

## **S. 4(1) of Planning and Development (Housing) and Residential Tenancies Act 2016**

### **Inspector's Report ABP-305991-19**

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#### **Strategic Housing Development**

142 no. residential units (58 no houses, 76 no. apartments, 8 no. maisonette apartments), childcare facility and associated site works.

#### **Location**

Seamount Road, Seamount Abbey, Malahide, Co. Dublin.

#### **Planning Authority**

Fingal County Council

#### **Applicant**

Ballymore Property Developments Ltd.

#### **Prescribed Bodies**

1. National Transport Authority.
2. Inland Fisheries Ireland.
3. Irish Water.
4. Department of Culture, Heritage and the Gaeltacht.
5. Transport Infrastructure Ireland.

6. Dublin Airport Authority.

**Observer(s)**

40 no. submissions and observations  
– listed in Appendix A.

**Date of Site Inspection**

24<sup>th</sup> February 2020.

**Inspector**

Karen Kenny

## Contents

1.0 Introduction .....	5
2.0 Site Location and Description .....	5
3.0 Proposed Strategic Housing Development .....	6
4.0 Planning History.....	7
5.0 Section 5 Pre-Application Consultation.....	8
6.0 Relevant Planning Policy .....	10
7.0 Applicant’s Statement of Consistency.....	12
8.0 Third Party Submissions .....	13
9.0 Planning Authority Submission .....	14
10.0 Prescribed Bodies .....	17
11.0 Screening for Environmental Impact Assessment.....	35
12.0 Appropriate Assessment Screening .....	36
13.0 Assessment.....	19
13.2. Principle and Quantum of Development.....	19
13.3. Building Height and Urban Design.....	21
13.4. Quality of Residential Development.....	24
13.5. Impact on Residential Amenities.....	27
13.6. Transport and Traffic .....	28
13.7. Drainage and Flood Risk.....	33
13.8. Other Issues .....	34
14.0 Recommendation .....	34
15.0 Reasons and Considerations .....	39
16.0 Recommended Order.....	40
17.0 Conditions .....	43



## 1.0 Introduction

- 1.1. This is an assessment of a proposed strategic housing development submitted to the Board under section 4(1) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

## 2.0 Site Location and Description

- 2.1. The site is located in Malahide, to the north of Seamount Road at c. 1.1 km south east of Malahide Main Street.
- 2.2. The site has a stated area of c. 3.98 hectares. It comprises two separate parcels of residential zoned land connected via open space zoned lands. The larger parcel (c. 2.5 ha) is bounded by the existing residential developments of The Hill and Grove Lawn to the north, Hill Drive and Oak Hall to the west and by Seamount Abbey and Seamount Park to the south. The smaller area (c. 0.8 ha) is a long narrow rectangular plot of land that slopes steeply upwards from Seamount Road and downwards from east to west. This area of land is bounded by Seamount Heights to the east, Seamount Drive to the west and Seamount Road to the south. Open grass lands to the east and north of the site are part of the former Malahide golf links and are zoned open space. There is an Irish Water reservoir between the two land parcels that appears as a covered earthen mound.
- 2.3. The topography of the area rises generally in a north-east direction with level differences of between 35.70 to 52.84 m OD within the site. There is a ridge level of 59 m OD to the east of the site that marks the highest point in the local landscape (Site Survey Drawing P19-009D-RAU-ZZ-ZZ-SU-A-PPP-1001). The eastern parcel of land rises steeply from Seamount Road (36.7m OD to 52.84m OD). The western section rises from west to east and from south to north (36.4m OD to 44.2m OD). The northern parts of the site are elevated above the surrounding context and there are views into and out of the site from the surrounding area.
- 2.4. The site is in grass for the most part and has been subject to disturbance. There is an existing haul road running north from Seamount Road through the eastern section of the site. In the western section ESB overhead cables have been undergrounded, there are 2 no. substations on the site and an earthen mound. The site boundaries

to Seamount Heights, Seamount Drive, Seamount Park and Seamount Abbey comprise temporary wooden fencing / hoarding of c. 2 metres in height. There are railings along the boundary to Oak Hill. The other boundaries comprise planting and older boundary walls and fences.

### 3.0 Proposed Strategic Housing Development

3.1. The proposed development consists of 142 no. residential units (58 no. houses and 84 no. apartments including 8 no. maisonettes) and a creche with associated and ancillary works.

3.2. Key Details:

Height	Houses, maisonettes and creche are 1-2 storey. Apartment blocks 5-6 storey split level with upper floor set back.
Site Area	3.98 ha gross / 3.28 ha net
Creche	186.63
Open Space	Public: 3,585 sq.m; Communal: 1,586 sq.m
Car Parking	246 spaces (154 no. surface and 92 no. basement).
Bike Parking	184 no. bicycle spaces (54 no. surface and 130 no. lower ground).
Density (net)	43 units per hectare.

3.3. Housing Mix

Beds	Apartment / Maisonettes	Houses	Total	%
1-bed	34	0	34	24
2-bed	46	0	46	32
3-bed	4	23	27	19
4-bed	0	35	35	25
	84	58	142	100%

- 3.4. 2 no. vehicular access points are proposed one directly from Seamount Road and one via the Seamount Abbey housing development.
- 3.5. A public children's playground is proposed on future park lands to the east / north of the housing.

## 4.0 Planning History

- 4.1. Recent planning history pertaining to the site:

### **ABP Ref. PL06F.244149 / PA Ref. F14A/0105**

Permission refused for 14 no. 2 storey houses on the eastern section of the site. ABP's reason for refusal is as follows:

*"The proposed development on the steeply sloping restricted site would not provide an appropriate form of public access to the proposed New Public Park on the elevated former Malahide Golf Links lands adjoining to the north of the subject site, as required under the Specific Objective 'Indicative Cycle/Pedestrian Route' as set out in the 2011-2017 Fingal County Development Plan, along Seamount Road and then northwards through the subject site, by reason of the steep gradient and unsuitable layout of the public access proposed through these lands and the lack of provision of resting points at regular intervals. The proposed development would, therefore, seriously injure the amenities of the area and be contrary to the proper planning and sustainable development of the area".*

### **APB Ref. PL06F.244128 / PA Ref. F14A/0106:**

Permission granted for 47 no. houses on the western / northern section of the site. The Board Order stated that the pedestrian link from the site to Oak Hall is an important feature of the overall coherent planning for the area. Conditions of note included:

Condition 2: No development shall take place until the lands for the adjoining public park (as indicated on drawing number ST-007 by Linda Sherlock Architects) has been ceded to the ownership of Fingal County Council.

Reason: In the interest of the amenities of the area.

Condition 3: Prior to the commencement of development, details of the proposed pedestrian link between the proposed development and the adjoining Oak Hall site shall be submitted to, and agreed in writing with, the planning authority.

Reason: In the interest of the amenities of the area.

**ABP Ref. 302548-18 / PA Ref. F18A/0357**

Permission granted for revisions to internal layout and elevations of 13 no. houses permitted under ABP 244128 & F14A/0106.

4.2. Recent Planning History in the wider area:

**F16A/0303**

Permission granted to Irish Water for a new reservoir adjacent to an existing reservoir.

**F06A/0373:**

Permission granted for 32 no. dwellings on lands at Seamount Abbey Malahide.  
Permission granted for amendments to the permitted scheme under F07A/0209.

## 5.0 Section 5 Pre-Application Consultation

5.1. A Section 5 pre-application consultation took place at the office of An Bord Pleanála on the 16th Day of August 2019, commencing at 11.30am. The main topics raised for discussion at the tripartite meeting were based on the agenda that issued in advance as follows:

- Design and Layout (e.g. density/internal layout/public realm)
- Transport (including cycle and pedestrian links/permeability/car parking provision/required infrastructure upgrades)
- Residential and Visual Amenity/Visual Impact
- Childcare Provision
- Any other matters

A copy of the Inspector's report and Opinion is on the file for reference by the Board.  
A copy of the record of the meeting is also available on the file.

## 5.2. Notification of Opinion



5.2.1. The An Bord Pleanála opinion stated that it is of the opinion that the documents submitted require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála. The issues raised in the opinion can be summarised as follows:

1. Residential density having regard to the existing and future accessibility of the site to public transport, including Malahide Dart Station and bus stops. The opinion stated that further consideration should be given to the provision of a pedestrian and cycle link through Oak Hall to improve the accessibility of the site.
2. Childcare provision having regard to the requirements of the scheme, the level of provision in the area and the criteria as set out in Childcare Facilities – Guidelines for Planning Authorities (2001).
3. The applicant was advised that the following specific information should be submitted with any application for permission: CGIs/visualisations/3D modelling; a report that addresses residential amenity; a report that addresses materials and finishes; a plan of the proposed open space within the site clearly delineating public, semi-private and private spaces; a Flood Risk Assessment; revised proposals in relation to surface water drainage; additional landscaping details; additional details in relation to Transport and pedestrian / cycle access and facilities; details of taking in charge; waste management details and a site specific construction and demolition waste management plan;

5.3. The application is accompanied by a Statement of Response to the notice issued by the board. The response to the items raised in the opinion is summarised as follows:

- The number of units increased by 16 no. units resulting in a net density of 43 units per hectare. Net density of 47 units per hectare when Irish Water reservations excluded.
- The density is within the density range of 35 – 50 units per hectare for ‘outer suburban’ sites set out in the Sustainable Residential Development in Urban Areas Guidelines, 2009. The site is a ‘peripheral and / or less accessible urban location’ under the Apartment Guidelines generally considered suitable for densities of < 45 units per hectare.

- The architectural design statement set out a response to design issues. The proposed layout is influenced by site attributes including gradient and the elevated nature of the site, wayleaves (Irish Water and ESB) and pedestrian / cycle connections to future park.
- A pedestrian / cycle connection through Oakhall cannot be provided. This estate remains in private ownership and the applicant and the local authority do not have sufficient legal interest in the lands to provide a direct connection. A more direct connection via Seamount Abbey is shown.
- Creche facility provided with capacity for 30 no. childcare spaces.
- The specific information is addressed within photomontages, CGI's, Landscape & Visual Impact Assessment; Architectural Design Statement; Sunlight, Daylight & Shadow Analysis, Sustainability Report, Landscape Plan, Housing Quality Assessment, Flood Risk Assessment, Engineering Report / Drawings, Traffic and Transport Assessment; Taking in Charge Drawing, Operational Waste Management Plan and Outline Construction and Demolition Waste Management Plan.

## 6.0 Relevant Planning Policy

### National Planning Framework

Chapter 4 of the Framework addresses the topic of 'making stronger urban places' and sets out a range of objectives which it is considered will assist in achieving same. National Policy Objective 13 provides that in urban areas, planning and related standards, including in particular building height and car parking, will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.

## **Section 28 Ministerial Guidelines**

6.1. Having considered the nature of the proposal, the receiving environment, the documentation on file, including the submissions from the Planning Authority, I am of the opinion that the directly relevant S.28 Ministerial Guidelines are:

- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' (including the associated 'Urban Design Manual').
- Design Manual for Urban Roads and Streets.
- Sustainable Urban Housing: Design Standards for New Apartments (2018).
- Childcare Facilities – Guidelines for Planning Authorities.
- Urban Development and Building Heights – Guidelines for Planning Authorities 2018.
- The Planning System and Flood Risk Management (including associated Technical Appendices).

## **6.2. Development Plan**

The site is zoned 'RS' (Residential) with an objective to 'provide for residential development and protect and improve residential amenity'; and 'OS' (Open Space) with an objective to 'preserve and provide for open space and recreational amenities'.

Strategic Policy 6 in relation to Moderate Sustainable Growth Towns is to "consolidate development and protect the unique identities of the settlements of Howth, Sutton, Baldoyle, Portmarnock, Malahide, Donabate, Lusk, Rush and Skerries'.

Chapter 2 Core Strategy: Table 2.8 states that Malahide has land supply of 88 hectares and capacity for 1114 no. residential units.

Objective SS17 in relation to Moderate Sustainable Growth Towns in the Metropolitan Area is to 'manage the development and growth of Malahide and Donabate in a planned manner linked to the capacity of local infrastructure to support new development of the area and taking account of the ecological sensitivity of qualifying features of nearby European Sites'.

Chapter 3 sets out Design Criteria for Residential Development including mix of dwellings, density and open space provision.

Chapter 4 Urban Fingal sets out objectives for urban settlements including Malahide. Chapter 12 Development Management Standards sets out standards for residential development including design criteria and quantitative standards relating to houses, apartments, privacy standards, public and private open space provision, car parking, etc.

Sheet No. 9 Malahide / Portmarnock

- There is an indicative cycle / pedestrian route running from south to north through the eastern section of the site.
- Specific Local Objective 52 states the following: 'Facilitate the provision of pedestrian linkages from east-west from The Hill to Robswall and north-south along part of the old Malahide to Portmarnock walkway route.
- The site is located within Dublin Airport Noise Zone C.

## 7.0 Applicant's Statement of Consistency

7.1. The applicant has submitted a Statement of Consistency as per Section 8(1)(iv) of the Act of 2016, which indicates how the proposal is consistent with the policies and objectives of Section 28 guidelines, the County Development Plan and regional and national planning policies. The following points are noted:

- Consistent with policy contained in NPF and RSES in relation to compact urban growth and more sustainable residential density within the Metropolitan Area and high quality urban design and architecture.
- Consistent with densities set out in Sustainable Residential Development Guidelines and with the 12 criteria set out in the accompanying Urban Design Manual.
- Development is compliant with SPPR's and standards of the Sustainable Urban Housing Design Standards for New Apartments.
- In terms of the Building Height Guidelines, the proposed development is considered to be compliant with SPPR 3 and SPPR 4 – and the specific criteria to be considered.

- The submitted Flood Risk Assessment is prepared in accordance with the Flood Risk Management Guidelines.
- The development complies with DMURS.
- In terms of the Childcare Facilities Guidelines, the application is accompanied by a Childcare Needs Assessment and a childcare facility is proposed.
- In terms of the Fingal County Development Plan: the site is zoned for residential use and is generally in compliance with objectives set out in Chapter 3 Place Making, Chapter 4 Urban Fingal, Chapter 7 Movement and Infrastructure, Chapter 8 Green Infrastructure, Chapter 9 Natural Heritage, Chapter 10 Cultural Heritage, Chapter 11 Land Use Zoning and Chapter 12 Development Management Standards.
- The proposed development would equate to c. 12.7% of the core strategy allocation for Malahide (1114 no. units). A Material Contravention Statement is provided in relation to the material contravention of the Development Plan in relation to the unit allocation for Malahide under the Core Strategy.
- The Material Contravention Statement states that the total residential capacity for Malahide set out in Table 2.8 of the Development Plan is 88 no. hectares of zoned land and 1114 no. units. The applicant's material contravention statement states that this would equate to an average density of c. 12.66 units per hectare and that the proposed density of 43 units per hectare is above this. It is argued that the CDP was adopted in March 2017, before the publication of the NPF and RSES. The objectives of the development plan are not clear in relation to the residential density for the site. The proposed density is considered to be justified on the basis of Section 28 Ministerial Guidelines (Sustainable Residential Development in Urban Areas Guidelines), the NPF and RSES.

## 8.0 Third Party Submissions

- 8.1.1. A total of 40 no. third party submissions have been received from local residents, a community group and public representatives. The main points made can be summarised as follows:

- Legal status of road and services connection through Seamount Abbey
- Traffic Impacts
- Impact of traffic on Seamount Abbey (inc. residential traffic, construction traffic, and vehicles accessing the public park)
- Inaccuracies in Traffic and Transport Assessment and failure to consider the impact on the estate roadway in Seamount Abbey
- Impact of traffic movements on existing reservoir
- Gradient of access road and compliance with Part M and DMURS
- Impact on Residential Amenity
- Childcare Facility
- Density
- Building Height
- Visual Impacts
- Capacity of Social Infrastructure (schools)
- Need for geophysical survey on former quarry lands
- Quantum of soil to be removed and associated traffic impacts.
- Quality of Open Space
- Unreliable Water Supply
- Concern re Appropriate Assessment
- Material Contravention of OS zoning
- Protection of hedgerow with Seamount Heights
- Clarification in relation to public use of the playground

## 9.0 Planning Authority Submission

9.1. Fingal County Council has made a submission in accordance with the requirements of section 8(5)(a) of the Act of 2016 that is contained on the file. The key issues raised in the submission are summarised below.

### PA Comment on Principle, Core Strategy, Zoning

- Core strategy allocation for Malahide of 1114 no. units. Development would not materially contravene core strategy as a standalone development. When considered cumulatively may outweigh core strategy guidelines for the settlement.
- No material contravention of OS zoning objective. Public road is not listed as being either 'permitted' or 'not permitted' and is therefore 'open for consideration'.

### PA Comment on Design and Visual Impact

- Overall design approach welcome. Lack of variety in design / materiality of houses.
- Height of the apartment blocks is beyond the acceptable limits and would be injurious to visual amenities of the immediate locality and wider context.
- Site is a highly sensitive landscape type and rises steeply from Seamount Road. There are long distant and panoramic views westwards and eastwards at highest points – site is visible from Swords, Baldoyle and Burrow Beach.
- The development would be contrary to Development Plan Objective NH36 in relation to protecting the character, integrity and distinctiveness of highly sensitive areas.
- The proposed development does not respect the natural contours of the site. Concerns in relation to accuracy of Site Sections. Section E-E in Architectural Design Statement p33 shows the overall massing of the apartment block relative to the dwellings. No section through the overall site from apartment blocks to Seamount Road.

### PA Comment on Residential Amenity

- Potential overlooking from proposed dwellings that back onto dwellings in Seamount Drive to the west. Recommended that first floor windows in the rear elevation are removed where a rear garden depth of 11 metres is not achieved.

- Concern that apartment blocks would overbear and overlook the terrace of dwellings (House Type D).
- Site is within the Dublin Airport Noise Zone C. Appropriate noise mitigation measures should be provided for dwellings.

#### PA Comment on Childcare

- Provision of a creche welcome. Concern in relation to location of the creche and lack of set down area.

#### PA Comment on Transportation and Traffic

- Question methodology used in TTA. Notwithstanding this, the only mitigation that the applicant can deliver relates to the timing of light phases on the existing junction. This can be addressed in conjunction with the Operations Department of the Council. A condition to this effect is recommended.
- Basement should comply with “Design Recommendations for Multi Storey and Underground Car Parks” Institution of Structural Engineers, UK. Ducting should be provided for electric charging points.
- Traffic calming acceptable. Recommend an additional built out south of the proposed built out on the western access.

#### PA Comment on Open Space and Landscaping

- Recommend that views west from future park be retained for the benefit of the public.
- Overall public open space requirement of 8,400 sq.m. Proposed public open space 2,899 sq.m. Other smaller areas would not meet the council’s requirements. Recommend that a financial contribution is provided in lieu of public open space provision.
- Details of landscaping and playground should be agreed with the PA. Concerns raised in relation to detailed design matters including boundary treatments, SUDs feature’s and retaining walls.
- Recommended tree bond of €120,000 and condition requiring public art to be agreed.



- Location of bin stores, ESB substations and public lighting on public open space not acceptable.

#### PA Comment on other issues.

- A number of procedural issues raised including absence of 'site numbers' on the submitted site layout plan, discrepancies between drawings and legend, and House Type G/H referred to as a single storey detached house where it contains first floor accommodation in the form of a bedroom and living room.

## 10.0 Prescribed Bodies

### 10.1. Irish Water

IW confirms that subject to a valid connection agreement being put in place the proposed connections to the IW networks can be facilitated.

### 10.2. Inland Fisheries

- Comprehensive surface water management measures required during construction and operational phases to prevent any pollution of surface waters.
- Recommend condition requiring the regular inspection and maintenance of the SuDS infrastructure and the petrol and oil interceptors throughout the operational stage.
- Drainage from the basement car parks must discharge to the foul sewer following treatment via a petrol / oil interceptor.
- Construction to be in line with a detailed site specific CEMP. CEMP should identify potential impacts and mitigation measures and ensure best construction of pipe work or at any stage to the existing surface water system.

### 10.3. Department of Culture, Heritage and the Gaeltacht

- Recommendation that the applicants engage the services of a suitably qualified archaeologist to co-ordinate the mitigation proposals contained in the Archaeological Assessment Report for monitoring of ground disturbance works during the course of construction.

- Archaeological method statements for mitigation to be agreed with DCHG prior to the commencement of works.

#### 10.4. **Dublin Airport Authority**

- Refers to site location within the Dublin Airport Noise Zone C and to Objective DA07 of the Development Plan.
- Recommend that the existing and predicted noise environment of the site be fully assessed with consideration for future airport growth, and that the applicant demonstrate that appropriate internal noise levels for habitable rooms can be achieved and maintained; that appropriate noise mitigation measures are proposed by the applicant and will be implemented as required by the CDP.
- Information recommended to be sought by FI or by condition.

#### 10.5. **Transport Infrastructure Ireland**

No observation to make.

#### 10.6. **National Transport Authority**

- Support development in principle as a means of consolidating development within the existing built up area and at a location that is just over 1 km from rail services.
- Request that ABP consider the road network and resulting number of pedestrian and cycle trips. The adjacent road network does not provide for an increased use by these modes in terms of crossings or through movement.
- The connections from the site in all directions towards Malahide Village, Malahide Dart station and St. Oliver Plunket's School to the local pedestrian and cycle network, should accommodate and provide for movement by these modes in accordance with the National Cycle Manual and the GDA Cycle Network Plan, in a manner that will serve the increased demand for travel and in a manner which maximises comfort, safety and security.
- Recommendations that pedestrian and cycle access to be provided to Oak Hall which would reduce the journey time by these modes to key destinations.

- In the context of the future proposed cycle / pedestrian link to the beach via Seamount Park that a cycle track is provided through the site from the access with Seamount Abbey as well as the proposed access route from Seamount Road.
- All works to be in accordance with the Design Manual for Urban Roads and Streets.

## 11.0 Assessment

11.1.1. Permission is sought for 142 no. dwellings and a creche on lands to the north of Seamount Road in Malahide. The planning issues arising from the proposed development can be addressed under the following headings-

- Principle and Quantum of Development
- Visual Impact and Design
- Quality of Residential Development
- Impact on Residential Amenities
- Transport and Traffic
- Water Services
- Other Issues

### 11.2. Principle and Quantum of Development

11.2.1. The site is subject to two zoning objectives in the Fingal Development Plan 2017-2023. The c. 2.5 ha area of land in the western section of the site and the 0.8 ha area in the eastern section of the site are zoned 'RS' Residential with an objective to "provide for residential development and protect and improve residential amenity'. The residential units and the creche are within the residential zoning and are permitted in principle. A connecting strip of land containing a section of the proposed access road (c. 100 m) and the playground are on lands zoned "OS" Open Space with an objective to 'preserve and provide for open space and recreational activity'. Community facilities are permitted in principle under the OS zoning and thus, the playground is acceptable. The zoning objective is not as clear in respect of the access road as highlighted in third party submissions. Works that are ancillary to

or incidental to a residential development (inc. roads) would generally fall within the 'residential' use class. 'Residential' is 'not permitted' under the OS zoning objective. In this case, however, the road has a wider public infrastructure function as it will facilitate access to a future park and to Irish Water infrastructure at this location (reservoirs). The development plan provides that uses that are not listed as being either 'permitted in principle' or 'not permitted' can be assessed by reference to the contribution towards the achievement of the zoning objective and compliance and consistency with the policies and objectives of the Development Plan. The access road will facilitate the development of a public park on open space zoned lands and will also facilitate the delivery of a pedestrian and cycle connection detailed under SLO 52 and on the zoning map. I am therefore satisfied that the proposed roadway is consistent with the zoning objective.

11.2.2. In relation to quantum of development, The Sustainable Residential Development in Urban Areas Guidelines (2009) set out density standards for urban areas. The subject site is within the established urban area of Malahide. The proposed dwellings would have a walking distance of over 1.5 km from Malahide Dart Station and of over 1 km from Malahide village. The guidelines recommend net densities of 35-50 dwellings per hectare on outer suburban / greenfield sites in Cities and Large Towns. A residential density of 43 no. units per hectare is proposed or 47 units per hectare if IW wayleaves are excluded. I consider the density to be acceptable having regard to the locational context of the site and to the characteristics of the site (includes rising topography and wayleaves that are limiting factors).

11.2.3. The application is accompanied by a Material Contravention Report relating to the Core Strategy of the Fingal Development Plan 2017-2023. Malahide has a household allocation of 1114 units based on a land supply of 88 hectares. It is put forward that this results in an average density of c. 12.66 units per hectares and that the proposed density would exceed this. However, this is an average density that is not specific to the subject site. The site is zoned residential, is not subject to phasing provisions and the proposed development is within the acceptable density ranges set out in national and local policy. On this basis, I am satisfied that the proposed development would not contravene, materially, the core strategy of the development plan for the area.

### 11.3. Visual Impact and Urban Design

#### 11.3.1. Context

The site is a greenfield site within an established residential area that is characterised by low density housing. The lands to the north and east of the site are open lands that were formally used as a golf links and are zoned open space. The topography of the area slopes down from a ridge in the open space lands to the east of the site (Site Survey Drawing P19-009D-RAU-ZZ-ZZ-SU-A-PPP-1001 and OSI Contour Mapping refer). There is a steep gradient within the application site with levels falling generally from north east to south west.

The proposed development comprises 58 no. houses and 84 no. apartments (inc. 8 no. maisonettes). The houses and maisonettes are predominantly 2 storey (Types A, B, C, D, E, F). Single storey houses with attic accommodation are proposed on the eastern section of the site (G, H). The Architects Design statement states that the houses are arranged around the perimeter of the site and follow the contours of the site. There is one housing block located centrally within the site. The 2 no. apartment blocks are located along the eastern boundary on elevated lands adjoining the open space zoning. These blocks are split level (in response to site levels) with 4 storeys plus setback on the eastern side and 5 storeys plus setback on the western side. In terms of the local context, the site is bounded by low density housing including single storey, dormer, 2 and 3 storey dwellings.

#### 11.3.2. Visual Impact

The following assessment relies on the LVIA, photomontages and sections submitted with the application and on observations during site inspection. I have also had regard to the matters raised in the PA opinion and in third party submissions.

In considering building height and visual impact regard is had to SPPR3 of the Urban Development and Building Height Guidelines (2018) which requires "...a greater mix of building heights and typologies in planning for the future development of suburban locations...".

The PA Opinion states that the height is not considered to be acceptable at this location, by virtue of the rising topography and elevated nature of the site. It states

that the proposal, specifically the apartment blocks, do not represent a proportionate increase in height across the site relative to the surrounding context. The submission states that at the highest point there are long distance and panoramic views westwards and eastwards. The opinion concludes that the proposed height of the apartment blocks would give rise to undue visual impact in the immediate locality and in the wider context of the surrounding area and would be seriously injurious to the sensitive landscape thereby, materially contravening Development Plan Objective NH36. The PA recommend that floors be removed in order to reduce the scale and height of the apartment blocks. The proposed building heights and the elevated nature of the site is also raised in third party submissions.

I have inspected the site and viewed it from a variety of locations in the surrounding area. I would note that the submitted photomontages illustrate 13 local views and that medium and long-range views are not illustrated. Given the topography of the area and the proximity to existing housing, the proposed development will be visible from the adjoining housing areas. It will also be visible from the open space lands to the east and north of the site. While the outlook from the adjoining areas would change from open lands to residential, I consider the visual change to be consistent with the zoning objective. I would note that the proposed 5-6 storey apartment blocks are at a remove from existing housing and provide frontage of architectural quality onto the future park. I consider this interface to be positive in the context of a proposed urban park.

I note the concerns raised in the PA opinion in relation to the visibility of the apartment blocks within the wider landscape. Photomontages from medium and long-range viewpoints would have been useful in considering the wider impacts. Notwithstanding this, I consider that medium and long-range views will be obscured to a degree by existing development and vegetation on adjoining sites. The apartment blocks extend to a roof level of +62.3 m OD, while the ridge to the east of the site peaks at c. +59 m OD. The upper levels would extend above the existing ridgeline and be visible at a distance. However, views from the coast to the north and east would be intermittent, limited by topography, vegetation and development on intermediate lands. I consider that the proposed development, when viewed at a distance, will be seen as part of the wider urban landscape at this location, and would not be unduly obtrusive or detract from the character or amenity of the wider

coastal landscape. On this basis, I am of the view that a material contravention of development plan Objectives NH36, NH37 and NH40 (relating to the protection of highly sensitive areas; skylines and ridgelines; and views and prospects from inappropriate development) would not arise. I am also satisfied that the proposed development will not impact on the character or setting of ACA's within Malahide Village due to the degree of separation. Overall, I consider that the development has the potential to add visual interest and make a positive contribution to the skyline.

#### 11.3.3. Urban Design and Public Realm

The area between housing blocks is given over to roads and open spaces. I am satisfied that the internal streets and open spaces are generally well integrated and overlooked. The apartments are of contemporary design and provide an urban edge to the future park. The houses are more suburban in character with high quality finishes proposed on all elevations. Housing blocks within the site are stepped in response to the site levels and the apartment blocks are split level. I would draw the Boards attention to the fact that while contours are generally followed the development will involve the reprofiling of the land in some areas and significant earth works are proposed. The section drawings submitted with the application generally show the existing and proposed ground levels.

In the eastern section of the site, SLO no. 52 of the Development Plan and Sheet 9 detail an indicative cycle / pedestrian route through the site that is part of a wider route that links into the proposed public park to the north. The proposed access road is 6 metres in width with a gradient of 1:16 and a 2 m wide footpath on one side. I am of the view that the public realm at this location would not provide an appropriate form of cycle / pedestrian provision due to the steep gradient of the access road (1:20 generally recommended under DMURS) and limited provision for cyclists. This matter is discussed further in Section 11.6 Transport.

#### 11.3.4. Visual Impact and Urban Design Conclusion

In conclusion, with the exception of the concerns raised in relation to the cycle and pedestrian connection I am satisfied that the development overall achieves a high-quality of public realm with good connections within the site and to the surrounding area.

#### 11.4. Quality of Residential Development

11.4.1. The following assessment considers the quality of the proposed Scheme with regard to the 'Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities' 2018; the 'Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas' and the associated Urban Design Manual; and the Fingal County Development Plan 2017-2023.

#### 11.4.2. Apartment Mix

The development provides the following mix of apartments and maisonettes:

<b>Beds</b>	<b>No. Units</b>	<b>%</b>
1-bed	34	40%
2-bed	46	55%
3-bed	4	5%
4-bed	0	0
<b>TOTAL</b>	<b>84</b>	<b>100%</b>

The apartment mix is in accordance with SPPR 1 of the 2018 apartment guidelines which indicates that apartment developments may include up to 50% one-bed or studio type units and there shall be no minimum requirement for apartments with three or more bedrooms.

#### 11.4.3. Apartment Design and Layout

The submitted Housing Quality Assessment indicates that floor areas for all apartment units exceed the minimum specified in SPPR3 of the apartment guidelines.

Section 3.7 of the guidelines stipulate that no more than 10% of the total number of two bed units in any private residential development may comprise two-bedroom, three-person apartments. All of the proposed two bed units cater for four persons.

SPPR 4 requires a minimum of 50% dual aspect units in suburban or intermediate locations such as this. 57% of the apartment and maisonette units are dual aspect meeting the standard.



SPPR 5 requires a minimum of 2.7m ground level apartment floor to ceiling heights. This requirement is met.

SPPR 6 specifies a maximum of 12 apartments per floor per core. This requirement is met.

Appendix 1 of the Guidelines set out minimum storage requirements, minimum aggregate floor areas for living / dining / kitchen rooms, minimum widths for living / dining rooms, minimum bedroom floor areas / widths and minimum aggregate bedroom floor areas. The apartments are compliant with the requirements set out in Appendix 1.

Appendix 1 of the Apartment Guidelines sets out minimum standards for private and communal open space provision. Private open space is provided in the form of balconies, winter gardens, roof terraces and shared gardens. The submitted schedule of floor areas indicates that private open spaces meet or exceed the standards in Appendix I of the apartment guidelines. The scheme generates a requirement for 555sq.m of communal open space based on the standards detailed in Appendix I of the apartment guidelines. Communal open space of 1,586 sq.m is provided in a courtyard area to the rear of the apartment blocks. This significantly exceeds the standards in Appendix I of the apartment guidelines.

#### 11.4.4. Public Open Space Provision

The Fingal Development Plan (Objective DMS57) requires public open space provision at a rate of 2.5 ha per 1000 population<sup>1</sup> with a minimum of 10% to be provided within the site and the option to pay a financial contribution in respect of any shortfall. The following requirement arises:

<b>Unit</b>	<b>No. of Units</b>	<b>No. Persons</b>	<b>Total Persons</b>	<b>Total Requirement</b>
1 & 2 bed	80	1.5	120	3,000
3 & 4 bed	62	3.5	217	5,425
<b>Total</b>	<b>142</b>	<b>N/A</b>	<b>337</b>	<b>8,425 sq.m.</b>

<sup>1</sup> For the purposes of calculation, the requirements are based on an occupancy rate of 3.5 persons for dwellings with three or more bedrooms and 1.5 persons for dwellings with two or fewer bedrooms.

A total of 3585 sq.m is provided. The areas range in size from 2214 sq.m to 342 sq.m in area. The PA seeks to exclude areas of <500 sq.m from the calculation on the basis that they do not meet the minimum size for a 'pocket park' detailed in Table 12.5 of the development plan. However, I am of the view that there is a good hierarchy and distribution of spaces within the development and that the areas are well designed and integrated within the scheme. I accept the applicants stated figure of 3,585 sq.m. The requirement to provide 10% of the site area is met. The PA recommend that a financial contribution is applied in lieu of outstanding provision. I recommend that a condition to this effect is attached in the event of a grant of permission.

#### 11.4.5. Communal Facilities

Section 4.5 of the Apartment Guidelines encourage the provision of communal facilities in apartment schemes, particularly in larger developments. In this case internal communal facilities are limited to a reception area in each of the apartment blocks. Given the relatively small scale of the apartment blocks and the exceedance of the standards for individual units set out in the guidelines, I am of the view that the level of provision is acceptable.

#### 11.4.6. Housing Design and Layout

The proposed 1 and 2-storey dwellings are in keeping with the scale and form of development in the surrounding area. The dwellings meet the internal space, open space and car parking standards set out in Chapter 12 of the Fingal Development Plan.

#### 11.4.7. Dublin Airport Noise Zone C

The site is in the Dublin Airport Noise Zone C and is subject to development plan Objective DA07 to "strictly control inappropriate development and require noise insulation where appropriate within the Outer Noise Zone.....". This issue has not been addressed within the submitted documents. There is no site-specific noise assessment or mitigation measures. The submission from the DAA recommends that these issues are addressed either through further information or by condition. I am satisfied that this issue can be adequately addressed by way of condition and

that a refusal would not be warranted on the basis of this issue alone. I recommend that the applicant is required to submit a noise assessment to the PA for agreement prior to the commencement of development, that includes specific mitigation measures to ensure that the internal noise levels for habitable rooms will be within acceptable limits.

- 11.4.8. Daylight, Sunlight; Overshadowing; Overlooking In relation to daylight and sunlight and shadow impacts I refer the Board to the Daylight, Sunlight and Shadow Assessment submitted with the application. The assessment concludes that the proposed development satisfies all recommended values. While no wind analysis has been submitted, I am satisfied having regard to the nature and scale of the proposed development, including the overall building height, that excessive wind impacts would not arise in this instance.

In relation to overlooking I would note that the blocks within the scheme are laid out such that in general there are distances greater than 22 metres between facades.

- 11.4.9. Quality of Residential Development Conclusion

To conclude, I consider that the design and layout of the development is satisfactory with regard to national and development plan guidance for residential development and that subject to compliance with the conditions set out below, there is a reasonable standard of residential accommodation for future residents of the scheme.

## 11.5. Impact on Residential Amenities

- 11.5.1. The potential for impact on residential amenity has been raised in a number of submissions received.
- 11.5.2. There is potential for impacts arising from noise, dust, traffic and other disturbance during the construction phase of the development. The application is accompanied by a Preliminary Construction and Waste Management Plan that addresses potential areas of conflict. I am satisfied that any impacts arising would be short-term in nature and can be managed to an acceptable degree by good construction practices. I recommend that conditions are included in the event of a grant of permission requiring the final Construction Management and Waste Management Plans to be

submitted to the PA for agreement. I also recommend that the standard condition limiting hours of construction is included.

11.5.3. In relation to Daylight, Sunlight and Shadow Assessment I refer the board to the assessment submitted with the application. The assessment concludes that impacts on surrounding development would be negligible.

11.5.4. Third party submissions from residents of Seamount Drive raise concerns in relation to the potential for overshadowing and overlooking of their properties which are situated to the immediate west of the single storey / dormer dwellings on the eastern parcel of land. Given the modest scale of the proposed dwellings and the level of separation I am satisfied that undue overshadowing would not arise. In relation to overlooking, I would note that in this instance the ground level of the proposed dwellings is set above the existing houses in Seamount Heights (Sections in Landscape Drawing 304 refer). The submitted sections suggest that windows at ground floor would be comparable in terms of impact to a first-floor window, while windows at upper levels (attic and 1<sup>st</sup> floor) would be comparable to a 2<sup>nd</sup> floor window. A separation of 22 metres is maintained between the existing and proposed dwellings which meets the development plan standard for 1<sup>st</sup> floor windows (OBJ DMS 28 refers). However, I consider that views from the upper level windows at attic and first floor levels would be unduly imposing on the garden areas of the dwellings to the west and would have an undue impact on the amenity of these properties. In the event that the Board is minded to grant permission, I recommend that 1<sup>st</sup> floor / attic level windows in the western elevation of the Type G and H units on plots no. 138 to 142 be omitted in full; and that the 6 no. Type F units (2-storey semi-detached) on plots no. 132-137 are replaced with 3 no. Type H units. Details in relation to the retention, protection and improvement of the boundary hedge between Seamount Drive and Seamount Heights, should be submitted to the PA for agreement prior to the commencement of any works.

11.5.5. Impact on Residential Amenities

To conclude, I consider that subject to compliance with the conditions set out below, the proposed development would not result in undue impacts on the amenities of properties in the vicinity.

## 11.6. Transport and Traffic

11.6.1. The site is located to the north of Seamount Road in Malahide and to the east of a signalised junction between Seamount Road and The Hill Road (R124). Seamount Road is a short cul-de-sac that serves residential development. The road has a single carriageway with footpaths on either side. There are no cycle tracks in the area. The site is c. 1.5 km walking distance from Malahide DART Station at the closest point. There is a bus stop on The Hill road within c. 350 metres of the site that forms part of a Portmarnock to Dublin Bus Route. Bus Connects proposed route 281 would run along The Hill Road and will connect Swords, to Portmarnock Dart Station at a service frequency of 20 minutes all day. The site is also within c. 1 km of local facilities in Malahide Village.

### 11.6.2. Vehicular Access

Vehicular access is proposed via 2 no. entrances from Seamount Road, one directly from Seamount Road and one via Seamount Abbey.

- The Seamount Road access would run north through the eastern section of the site before curving west. SLO no. 52 of the development plan and Sheet 9 provide for a cycle and pedestrian route through this section of the site. The indicative route is part of a wider route connecting into the future park to the north. The road as proposed comprises a 6m wide carriageway and a 2m wide footpath on one side. There is no dedicated cycle provision. The site slopes up steeply at this location and the proposed road has a gradient of 1:16 between Seamount Road and its intersection with the Seamount Abbey access to the west (Engineering Drawings P302 and P303 refer). This is above the maximum gradient of 1:20 recommended by DMURS. DMURS states that:

*“In urban areas, it is likely that the comfort of vulnerable road users will be the determining factor for desirable maximum longitudinal gradients on streets. Part M of the building regulations advises that access routes with a gradient of 1:20 or less are preferred. Therefore, a maximum gradient of 5% (1:20) is desirable on streets where pedestrians are active. In hilly terrain, steeper gradients may be required but regard must be had to the maximum gradient that most wheelchair users can negotiate of 8.3% (1:12), although this should*

*be limited to shorter distances. A designer may need to consider mitigation measures, such as intermediate landings, to ensure that pedestrian routes are accessible” (Section 4.4.6).*

In 2015, ABP refused permission for 14 no. dwellings on this section of the site (ABP Ref. PL06F.244149 / PA Ref. F14A/0105) on the basis that the steeply sloping site would not provide an appropriate form of public access to the proposed New Public Park to the north of the site, as required under a Specific Objective of the development plan due to the steep gradient and unsuitable layout of the public access and the lack of provision of resting points at regular intervals.

Given the steeply sloping and restricted nature of the site it is evident that a maximum gradient of 1:20 (5%) is not readily achievable at this location. Having regard to the relaxations provided in DMURS for hilly terrain and the fact that an alternative access route is provided on this occasion, I consider that the previous refusal can be addressed generally within the proposed layout. In the event that the Board is minded to grant permission I recommend that a condition is included requiring the applicant to submit revised details for the section of road between Seamount Road and the Seamount Abbey access. The revised details should include intermediate landings at regular intervals and provisions for cyclists between Seamount Road and the proposed park. The design of the entrance onto Seamount Road should also meet the relevant gradient standards. There is a pinch point at the northern end of the north-south access road where the site narrows and the gradient increases (Sections detailed on Landscape Drawing 302 refer). The Board may wish to omit the 8 no. maisonette apartments (units 124-131 inclusive) to provide adequate space for the landings and cycle provision at this location.

- The connection from Seamount Road via Seamount Abbey is a 6m wide roadway with footpaths on both sides. The road is c. 220m in length and contains a priority-controlled junction onto Seamount Road. This road currently serves the 32 dwellings in Seamount Abbey. Third party submissions refer to the restricted estate road network in Seamount Abbey and state that the proposed development will be seriously injurious to

residential amenity, traffic and pedestrian safety and convenience. I consider the width, vertical and horizontal alignment of the road network in Seamount Abbey to be of high design standard by reference to the standards set out in Chapter 4 of DMURS and I am satisfied that it has the capacity to accommodate the proposed development (this is discussed further under Section 11.6.4 below). I would note that under the Phase 1 application for 32 dwellings (PA Ref. F06A/0373) it was envisaged that lands to the north would be served by this road network.

- Third-party submissions from residents of Seamount Abbey question the applicant's legal entitlement to make road and service connections through Seamount Abbey. The submissions state that the estate is not taken in charge and is maintained by an owner appointed management company. The submitted details include a deed of transfer to the Seamount Abbey Management Company relating to common areas in the estate (2014). The applicant on the other hand has submitted the deed of purchase for the subject site (2017). The Second Schedule of this agreement grants the purchaser the easements, rights and privileges that allow the purchaser, its successors and assigns, to pass and re-pass over the common areas on Phase 1 of the development known as Seamount Abbey and to connect to the services therein. I note the reference in third party submissions to current legal proceedings in respect of these matters. I am satisfied that the applicant has demonstrated sufficient legal interest for the purposes of making an application and that the matters raised by third parties are legal matters ultimately for resolution in the Courts. The Development Management Guidelines (Section 5.13), clearly state that the planning system is not designed as a mechanism for resolving disputes about rights over land and that these are ultimately matters for resolution in the Courts. Furthermore, section 34(13) of the Planning Act states provides that a person is not entitled solely by reason of a permission to carry out any development.

#### Car Parking

A total of 246 car parking spaces are proposed. This includes 8 no. spaces in the future park that are outside of the site boundary. Of the 238 no. spaces serving the residential development 126 are in-curtilage spaces serving houses and

maisonettes. The rate of provision for the houses are maisonettes is generally consistent with the standards in the development plan (Table 12.8 refers). The Apartment Guidelines (Sections 4.0) promote reduced car parking provision at suitable locations. 112 no. spaces are proposed to serve the 76 no. apartments equating to a rate of 1.48 no. spaces per apartment. I consider the level of car parking provision to be acceptable by reference to the standards in the development plan and apartment guidelines given the sites 'intermediate' urban location.

#### 11.6.3. Bicycle Parking

A total of 184 no. cycle parking spaces are proposed. This includes 168 no. spaces for the apartments, with 130 no. secure resident spaces at lower ground level and 38 no. visitor spaces at surface level. I consider the level of provision to be acceptable by reference to local and national standards.

#### 11.6.4. Traffic Transport Assessment (TTA)

In relation to traffic impacts I would note that the NRA's Traffic and Transport Assessment Guidelines (2014) recommend that planning applications for residential developments in excess of 200 dwellings should include a Transport Assessment (Table 2.1). The proposed development falls below this threshold. Nonetheless, a TTA has been submitted that forecasts traffic generation from the proposed development (using the TRICS database) and models the impact on the signalised junction of Seamount Road and The Hill road. This is the point at which all traffic from Seamount Road, a cul-de-sac, enters onto the wider road network. The TTA concludes that the proposed development and a separate development that is under construction along Seamount Road would not result in capacity or operational issues at the junction. The CE's Opinion indicates that light phases may need to be adjusted to accommodate future development in the area, but that that this can be done in conjunction with the PA's operations department. Third-party submissions question the failure to assess the impact of increased traffic on Seamount Abbey junction with Seamount Road. Assumptions in the TTA in relation to the proportion of units using Seamount Abbey are also questioned. I am satisfied that the approach taken in the TTA is reasonable. While the proposed development will result in increased traffic movements through Seamount Abbey, I am of the view that the safety and carrying capacity of the road network would not be unduly prejudiced by the proposed



development and that any congestion arising would not be significant in the context of the wider urban road network.

#### 11.6.5. Construction Traffic

The application is accompanied by a Construction and Waste Management Plan. Concerns are raised in third party submissions in relation to the impact of construction traffic on the local road network. I am satisfied that traffic impacts arising during construction would be short term in nature and can be managed in accordance with an agreed traffic management plan. I am of the view that construction traffic should access the site from Seamount Road via the existing haul road and should not use the proposed access through Seamount Abbey. I recommend that this is addressed by condition in the event of a grant of permission.

#### 11.6.6. Traffic and Transportation Impacts Conclusion

Having regard to the above assessment, I am satisfied that, subject to the conditions set out below, the development will not result in undue adverse traffic impacts and that any outstanding issues may be dealt with by condition.

### 11.7. **Drainage and Flood Risk**

- 11.7.1. The proposed development would connect to the public foul drainage and water supply networks. Full details are set out in the engineering drawings and the engineering services report accompanying the application. I note that the PA and Irish Water have no objection to the proposed drainage arrangements.
- 11.7.2. Surface water would be discharged to the public surface water drainage network and SUDs measures are proposed to control the level of discharge. Details for the management of stormwater during the construction stage can be addressed through a Construction Environmental Management Plan. This can be addressed by condition.
- 11.7.3. The site is not within Flood Zones A or B and has a low probability of flooding. Potential risks arising from pluvial flooding are addressed through design mitigation. I am satisfied that the potential risks have been adequately considered and addressed in accordance with the requirements of the Flood Risk Management Guidelines.

## 11.8. Other Issues

### Childcare Facilities and Schools Demand

- 11.8.1. The application is accompanied by a Childcare Needs Assessment. The assessment estimates a demand for c. 29 no. childcare spaces. A childcare facility with capacity for 30 no. children is proposed to meet this demand. The rate of provision meets the standards set out in the Childcare Facilities Guidelines 2001 and as updated by the Apartment Guidelines 2018.

### Part V

- 11.8.2. The applicant has submitted proposals to provide for 14 no. units or 10% of the proposed units to the planning authority under Part V. The submitted details include costing details and plans showing proposed Part V units. The PA opinion indicates no objection to the proposals.

### Built Heritage and Archaeology

The application is accompanied by an Archaeological Assessment. There are no Recorded Monuments within the site and no archaeological features, structures or deposits were identified during on site testing. However, due to constraints experienced during testing and the archaeological potential of the area the assessment recommends archaeological monitoring of topsoil stripping. DCHG recommend that the services of a suitably qualified archaeologist are engaged to monitor ground disturbance works during the course of construction and that a method statements for mitigation is agreed with DCHG prior to the commencement of works.

## 11.9. Planning Assessment Conclusions

Subject to compliance with the conditions set out below, I consider that the proposed development would constitute an acceptable quantum and density of development in this accessible urban location, would not seriously injure the residential or visual amenities of the area, would be acceptable in terms of urban design, height and quantum of development and would be acceptable in terms of pedestrian and traffic safety. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

## 12.0 Screening for Environmental Impact Assessment

- 12.1.1. The applicant has submitted an EIA Screening Report. The Report concludes that the proposed development is below the thresholds for mandatory EIAR and that a sub threshold EIAR is not required in this instance as the proposed development will not have significant impacts on the environment.
- 12.1.1. Item (10)(b) of Schedule 5 Part 2 of the Planning and Development Regulations 2001 (as amended) provides that mandatory EIA is required for the following classes of development:
- Construction of more than 500 dwelling units
  - Urban development which would involve an area greater than 2 ha in the case of a business district, 10 ha in the case of other parts of a built-up area and 20 ha elsewhere. (In this paragraph, “business district” means a district within a city or town in which the predominant land use is retail or commercial use.)
- 12.1.2. EIA is required for development proposals of a class specified in Part 1 or 2 of Schedule 5 that are sub-threshold where the Board determines that the proposed development is likely to have a significant effect on the environment<sup>2</sup>. For all sub-threshold developments listed in Schedule 5 Part 2, where no EIAR is submitted or EIA determination requested, a screening determination is required to be undertaken by the competent authority unless, on preliminary examination it can be concluded that there is no real likelihood of significant effects on the environment.
- 12.1.3. The proposed development is an urban development project comprising 142 no. dwellings and a creche. The proposed development is located on greenfield lands within an established residential area that are zoned residential and open space.
- 12.1.4. The development would be located in a built-up area but not in a business district. It is therefore within the class of development described at 10(b) of Part 2 of Schedule 5 of the planning regulations, and an environmental impact assessment would be mandatory if it exceeded the threshold of 500 dwelling units or 10 hectares. The proposal for 142 dwellings on 3.98 ha is below the thresholds. The criteria set out in schedule 7 of the regulations, and those at Annex III of the EIA directive 2011/92/EU

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<sup>2</sup> Section 172(1)(b) of the Planning and Development Act 2000 (as amended) refers.

as amended by 2014/52/EU therefore have to be applied with regard to the characteristics and location of the proposed development, and the type and characteristics of its potential impact.

12.1.5. The proposed development would be located on greenfield lands in an established urban area. The area is residential in character. The larger part of the development would be in residential use, which is the same use as that established on most of the surrounding land, along with a proposed childcare facility. The proposed development would use the water and drainage services of the city, upon which its effects would be marginal. It is not a large-scale project or overly dense in an urban context and there are no apparent characteristics or elements of the design that are likely to cause significant effects on the environment. The proposed development is not likely to have a significant effect on any Natura 2000 site (as per findings of section 13 of this assessment).

12.1.6. Having regard to:

(a) the nature and scale of the proposed development, on zoned lands served by public infrastructure,

(b) the absence of any significant environmental sensitivities in the area,

(c) the location of the development outside of any sensitive location specified in article 109(3) of the Planning and Development Regulations 2001 (as amended),

It is concluded that, by reason of the nature, scale and location of the subject site, the proposed development would not be likely to have significant effects on the environment. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required

## 13.0 **Appropriate Assessment Screening**

13.1.1. The application is accompanied by an AA Screening Report and an Ecological Impact Statement prepared by Openfield Ecological Services. I would note that the Screening Report states, in error, that there is no European site within a 2km radius of the site. Notwithstanding this, I am satisfied that the information on file is sufficient to allow me to undertake Appropriate Assessment Screening in respect of the proposed development.

13.1.2. Proposed Development

The proposed development comprises 142 no. dwellings and a creche on a site of 3.98 ha on serviced lands in the built-up area of Malahide. The site has been subject to previous disturbance and is characterised by bare ground and dry meadows for the most part with hedgerow and treelines. There are no watercourses within or in the vicinity of the site and no habitats or species of conservation significance were identified during site survey.

#### 13.1.3. Zone of Influence

The site is not in or immediately adjacent to any Natura 2000 site. The closest sites are the Malahide Estuary SAC (Site Code 0205) and Malahide Estuary SPA (Site Code 4025) both c. 600 metres from the site at its closest point. Given the extent of previous disturbance on the site and the low ecological value of the site, issues relating to loss of habitat and impacts on terrestrial ecology do not arise. There is the possibility for hydrological connections to the Malahide Estuary SAC and SPA via surface water and wastewater connections. I am satisfied that the potential for impacts on other European Sites can be excluded at the preliminary stage due to the nature and scale of the proposed development, the degree of separation and the absence of ecological and hydrological pathways.

#### 13.1.4. Potential Effects on Malahide Estuary SAC (Site Code 0205) and Malahide Estuary SPA (Site Code 4025)

The Qualifying Interests and Special Conservation Interests for these sites as detailed in Section 2.2 of the submitted AA Screening Report and I have referred to same. The specific conservation objectives for these sites (NPWS 2013) are based on attaining 'favourable conservation status' for all relevant habitats and species.

- Wastewater from the site will drain, via public drainage networks, to a municipal treatment plant in Malahide, which in turn discharges to Malahide Estuary. The plant is operated by IW and discharges under licence to the Malahide Estuary. The treatment plant is operating within its treatment capacity. Furthermore, the discharge from the subject site would equate to a very small percentage of the overall licenced discharge at Malahide WWTP and thus its impact on the discharge would be marginal. I am, therefore, satisfied that the potential for significant effects on the qualifying interests of

the Malahide Estuary SAC and SPA as a result of wastewater generated by the proposed development can be excluded.

- Surface water generated during the construction and operational phases will run to an existing surface water sewer that discharges to the estuary. The risk to water quality during the construction phase is low as there are no direct pathways to any surface water body. The risk of pollution during the operational phase is also low. The discharge from the site will be a very small percentage of the overall stormwater discharge to the estuary and thus its impact would be marginal. I am, therefore, satisfied that the potential for significant effects on the qualifying interests of the Malahide Estuary SAC and SPA as a result of surface water runoff can be excluded.
- Water supply will be from the reservoir at Leixlip on the River Liffey. The River Liffey is not a designated European Site and the water demand of the scheme is not significant in the context of the overall supply from Leixlip.

I conclude that the proposed development would not be likely to have any significant effects on any Natura 2000 site, either directly or indirectly or in combination with other plans and projects. This conclusion is consistent with the appropriate assessment screening report submitted with the application.

#### AA Screening Conclusion

It is reasonable to conclude that on the basis of the information on file, which I consider adequate in order to issue a screening determination, that the proposed development, individually or in combination with other plans or projects would not be likely to have a significant effect on European Site No. 0205 (Malahide Estuary SAC), European Site no. 4025 (Malahide Estuary SPA) or any European site, in view of the site's Conservation Objectives, and a Stage 2 Appropriate Assessment (and submission of a NIS) is not therefore required.

## 14.0 Recommendation

Having regard to the above assessment, I recommend that permission is GRANTED for the development as proposed for the reasons and considerations and subject to the conditions set out below.

## 15.0 Reasons and Considerations

Having regard to the following:

1. The location of the site in the established urban area of Dublin and;
2. The policies and objectives in the Fingal Development Plan 2017-2023;
3. The Rebuilding Ireland Action Plan for Housing and Homelessness;
4. The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual;
5. The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2018;
6. The Design Manual for Urban Roads and Streets (DMURS);
7. The nature, scale and design of the proposed development and the availability in the area of a wide range of social, transport and water services infrastructure;
8. The pattern of existing and permitted development in the area;
9. The planning history within the area,
10. The submissions and observations received, and
11. The Inspector's report.

It is considered that, subject to compliance with the conditions set out below that the proposed development would constitute an acceptable quantum and density of development in this accessible urban location, would not seriously injure the residential or visual amenities of the area, would be acceptable in terms of urban design, height and quantum of development and would be acceptable in terms of pedestrian and traffic safety. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

## 16.0 Recommended Order

**Application:** for permission under section 4 of the Planning and Development (Housing) and Residential Tenancies Act 2016, in accordance with plans and particulars, lodged with An Bord Pleanála on the 22<sup>nd</sup> day of November 2019 by Stephen Little and Associates, on behalf of Ballymore Property Developments Limited.

### **Proposed Development:**

The proposed development will consist of:

- 142 no. residential units, including 58 no. detached, semi-detached and terraced houses (35 no. 4-bed (house types A, B & C) and 23 no. 3-bed (House types D, F, G & H)) and 8 no. 1-bed maisonette apartments (house type E), all with private rear gardens. 76 no. apartments (26 no. 1-bed, 46 no. 2-bed and 4 no. 3-bed), all with private patios, terraces or balconies on east and west facing apartment building elevations.
- Building heights ranges between 1 and 2 storeys for houses and maisonettes, and split level 5-6 storey over basement, with setback at penthouse levels 5 and 6, in each of the 2 no. apartment buildings.
- 1 no. 2-storey creche building (c. 186.63 sq.m gross floor area) with external play area.
- And, all associated and ancillary site development and infrastructural works (associated plant), hard and soft landscaping and boundary treatment works, including:-
  - 2 no. vehicular site entrances and associated road works, at Seamount Road and Seamount Abbey,
  - Vehicular, pedestrian and cycle access through the site, connecting with Seamount Road, Seamount Abbey and the former Malahide golf links lands,
  - Provision of Public Open Space and children's playground facilities,
  - 246 no. ancillary car parking spaces (154 no. surface space in a mix of on-curtilage, off and on street locations and 92 no. at basement level),



- 184 no. ancillary bicycle parking spaces (130 no. at the lower ground floor level & 54 no. at surface level),
- Bin store & collection areas, and 1 no. ESB Unit Sub-station and use of existing sub-station on site.

**Decision:**

Grant permission for the above proposed development in accordance with the said plans and particulars based on the reasons and considerations under and subject to the conditions set out below.

**Matters Considered**

In making its decision, the Board had regard to those matters to which, by virtue of the Planning and Development Acts and Regulations made thereunder, it was required to have regard. Such matters included any submissions and observations received by it in accordance with statutory provisions.

**Reasons and Considerations**

In coming to its decision, the Board had regard to the following:

1. The location of the site in the established urban area of Dublin and;
2. The policies and objectives in the Fingal Development Plan 2017-2023;
3. The Rebuilding Ireland Action Plan for Housing and Homelessness;
4. The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual;
5. The Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2018;
6. The Design Manual for Urban Roads and Streets (DMURS);
7. The nature, scale and design of the proposed development and the availability in the area of a wide range of social, transport and water services infrastructure;
8. The pattern of existing and permitted development in the area;
9. The planning history within the area,
10. The submissions and observations received, and
11. The Inspector's report.

### **Appropriate Assessment**

The Board completed an Appropriate Assessment screening exercise in relation to the potential effects of the proposed development on designated European sites, taking into account the nature, scale and location of the proposed development within a zoned and serviced urban site, the information for the Screening for Appropriate Assessment submitted with the application, the Inspector's Report, and submissions on file. In completing the screening exercise, the Board adopted the report of the Inspector and concluded that, by itself or in combination with other development in the vicinity, the proposed development would not be likely to have a significant effect on any European site in view of the conservation objectives of such sites, and that a Stage 2 Appropriate Assessment is not, therefore, required.

### **Environmental Impact Assessment**

The Board completed an environmental impact assessment screening of the proposed development and considered that the Environmental Impact Assessment Screening Report submitted by the applicant, identifies and describes adequately the direct, indirect, secondary, and cumulative effects of the proposed development on the environment.

Having regard to:

- (a) the nature and scale of the proposed development on an urban site served by public infrastructure,
  - (b) the absence of any significant environmental sensitivities in the area,
  - (c) the location of the development outside of any sensitive location specified in article 109(3) of the Planning and Development Regulations 2001 (as amended),
- the Board concluded that, by reason of the nature, scale and location of the subject site, the proposed development would not be likely to have significant effects on the environment. The Board decided, therefore, that an environmental impact assessment report for the proposed development was not necessary in this case.

### **Conclusions on Proper Planning and Sustainable Development:**

The Board considered that, subject to compliance with the conditions set out below that the proposed development would constitute an acceptable quantum and density of development in this accessible urban location, would not seriously injure the residential or visual amenities of the area, would be acceptable in terms of urban design, height and quantum of development and would be acceptable in terms of

pedestrian and traffic safety. The proposed development would, therefore, be in accordance with the proper planning and sustainable development of the area.

## 17.0 Conditions

1. The development shall be carried out and completed in accordance with the plans and particulars lodged with the application except as may otherwise be required in order to comply with the following conditions. Where such conditions require details to be agreed with the planning authority, the developer shall agree such details in writing with the planning authority prior to commencement of development and the development shall be carried out and completed in accordance with the agreed particulars.

**Reason:** In the interest of clarity.

2. A total of 131 no. units are hereby permitted.

**Reason:** In the interest of clarity.

3. The proposed development shall be amended as follows:

- (a) Intermediate landings shall be provided on access roads with a gradient greater than 1:20 (detailed on Waterman Moylan Engineering Drawings P302 and P303).
- (b) The road from Seamount Road to the proposed public park to the north shall be revised to include provisions for pedestrians and cyclists.
- (c) The gradient of the carriageway and at the intersection with the public road shall comply with the standards set out in the Design Manual for Urban Roads and Streets (2013).
- (d) The proposed Type E units (maisonette apartments) on plots no. 124-131 inclusive shall be omitted from the development.

- (e) The 6 no. Type F units on plots no. 132-137 inclusive shall be omitted and replaced with 3 no. Type H units.
- (f) Windows at first floor / attic level in the western elevation of all Type G and Type H dwellings shall be omitted.

Revised drawings showing compliance with these requirements shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development.

**Reason:** In the interests of traffic safety, public safety and amenity.

- 4. An Inward Noise Assessment shall be submitted to and agreed in writing with, the planning authority prior to the commencement of development.

The assessment shall comply with the following requirements:

- (a) It shall set out details the baseline noise environment in the area and the predicted noise environment with consideration for future airport growth using best practice noise measuring and forecasting techniques;
- (b) Set out noise mitigation measures that are designed to ensure that the internal noise levels for habitable rooms within the development will be within day and night-time noise limits;
- (a) The mitigation measures identified in the agreed Inward Noise Assessment, shall be implemented in full by the applicant, except as may otherwise be required in order to comply with the following conditions.

**Reason:** In the interest of residential amenity and in response to the site's location in Dublin Airport Noise Zone C.

- 5. The development shall be carried out on a phased basis, in accordance with a phasing scheme which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of any development.

**Reason:** To ensure the timely provision of services and facilities, for the benefit of the occupants of the proposed dwellings

6. Not more than 75 residential units shall be made available for occupation before completion of the childcare facility unless the developer can demonstrate to the written satisfaction of the planning authority that a childcare facility is not needed (at this time).

**Reason:** To ensure that childcare facilities are provided in association with residential units, in the interest of residential amenity.

7. The internal road network serving the proposed development, including turning bays, junctions, parking areas, footpaths and kerbs, and the underground car park shall be in accordance with the detailed construction standards of the planning authority for such works and design standards outlined in DMURS. In default of agreement the matter(s) in dispute shall be referred to An Bord Pleanála for determination.

**Reason:** In the interest of amenity and of traffic and pedestrian safety.

8. Details of the materials, colours and textures of all the external finishes to the proposed dwellings/buildings shall be as submitted with the application, unless otherwise agreed in writing with, the planning authority/An Bord Pleanála prior to commencement of development. In default of agreement the matter(s) in dispute shall be referred to An Bord Pleanála for determination.

**Reason:** In the interest of visual amenity.

9. The site shall be landscaped (and earthworks carried out) in accordance with the detailed comprehensive scheme of landscaping, which accompanied the application, unless otherwise agreed in writing with, the planning authority prior to the commencement of development. The scheme shall include specific details for the retention, protection and improvement of boundary hedgerows.

**Reason:** In the interest of residential and visual amenity.

10. The areas of public open space shown on the lodged plans shall be reserved for such use and shall be levelled, contoured, soiled, seeded, and landscaped in accordance with the landscape scheme submitted to An Bord Pleanála with this application, unless otherwise agreed in writing with the planning authority. This work shall be completed before any of the dwellings are made available for occupation and shall be maintained as public open space by the developer until taken in charge by the local authority or management company

**Reason:** In order to ensure the satisfactory development of the public open space areas, and their continued use for this purpose.

11. A minimum of 10% of all communal car parking spaces should be provided with functioning EV charging stations/points, and ducting shall be provided for all remaining car parking spaces, including in-curtilage spaces, facilitating the installation of EV charging points/stations at a later date. Where proposals relating to the installation of EV ducting and charging stations/points has not been submitted with the application, in accordance with the above noted requirements, such proposals shall be submitted and agreed in writing with the Planning Authority prior to the occupation of the development.

**Reason:** To provide for and/or future proof the development such as would facilitate the use of Electric Vehicles.

12. Proposals for street names, house numbering scheme and associated signage shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. Thereafter, all signs, and numbers shall be provided in accordance with the agreed scheme. The proposed names shall be based on local historical or topographical features, or other alternatives acceptable to the planning authority.

**Reason:** In the interest of urban legibility and to ensure the use of locally appropriate placenames for new residential areas.

13. All service cables associated with the proposed development (such as electrical, telecommunications and communal television) shall be located underground. Ducting shall be provided by the developer to facilitate the provision of broadband infrastructure within the proposed development. All existing over ground cables shall be relocated underground as part of the site development works.

**Reason:** In the interests of visual and residential amenity.

14. The developer shall enter into water and/or wastewater connection agreement(s) with Irish Water, prior to commencement of development.

**Reason:** In the interest of public health.

15. Water supply and drainage arrangements, including the attenuation and disposal of surface water, shall comply with the requirements of the planning authority for such works and services.

**Reason:** In the interest of public health.

16. Communal waste storage areas in the development shall be designed and managed in accordance with an operational waste management plan that shall be submitted and agreed with the planning authority prior to the commencement of development. Prior to the occupation of any of the commercial units a food and bio-waste management plan shall be submitted for the written agreement of the planning authority. Grease traps shall be installed and managed in any commercial food preparation area or kitchen.

**Reason:** In the interests of public health.

17. No additional development, including lift motor enclosures, air handling equipment, storage tanks, ducts or external plant, or telecommunication antennas, shall take place above roof level other than within the roof

enclosures shown on the submitted drawings, whether or not it would otherwise constitute exempted development.

**Reason:** In the interests of visual amenity.

18. The construction of the development shall be managed in accordance with a Construction and Waste Management Plan, which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This plan shall provide details of intended construction practice for the development, including:

(a) Location of the site and materials compounds including areas identified for the storage of construction refuse; areas for construction site offices and staff facilities; site security fencing and hoardings; and on-site car parking facilities for site workers during the course of construction;

(b) The timing and routing of construction traffic to and from the construction site and associated directional signage; measures to obviate queuing of construction traffic on the adjoining road network; and measures to prevent the spillage or deposit of clay, rubble or other debris on the public road network;

(c) Construction vehicles shall access the site from Seamount Road and all not access the site via the Seamount Abbey estate.

(d) Details of the implementation of appropriate mitigation measures for noise, dust and vibration, and monitoring of such levels;

(e) 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;

(f) Means to ensure that surface water run-off is controlled such that no silt or other pollutants enter local surface water sewers or drains.

A record of daily checks that the works are being undertaken in accordance with the Construction Management Plan shall be kept for inspection by the planning authority.



**Reason:** In the interest of amenities, public health and safety.

19. Site development and building works shall be carried out only between the hours of 0700 to 1900 Mondays to Fridays inclusive, between 0800 to 1400 hours on Saturdays and not at all on Sundays and public holidays. Deviation from these times will only be allowed in exceptional circumstances where prior written approval has been received from the planning authority.

**Reason:** In order to safeguard the residential amenities of property in the vicinity.

20. Construction and demolition waste shall be managed in accordance with a construction waste and demolition management plan, which shall be submitted to, and agreed in writing with, the planning authority prior to commencement of development. This plan shall be prepared in accordance with the “Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects”, published by the Department of the Environment, Heritage and Local Government in July 2006.

**Reason:** In the interest of sustainable waste management.

21. The developer shall facilitate the preservation, recording and protection of archaeological materials or features that may exist within the site. In this regard, the developer shall -
- (a) notify the planning authority in writing at least four weeks prior to the commencement of any site operation (including hydrological and geotechnical investigations) relating to the proposed development,
  - (b) employ a suitably-qualified archaeologist who shall monitor all site investigations and other excavation works, and
  - (c) provide arrangements, acceptable to the planning authority, for the recording and for the removal of any archaeological material which the

authority considers appropriate to remove.

In default of agreement on any of these requirements, the matter shall be referred to An Bord Pleanála for determination.

**Reason:** In order to conserve the archaeological heritage of the site and to secure the preservation and protection of any remains that may exist within the site.

22. Prior to commencement of development, the developer shall lodge with the planning authority a cash deposit, a bond of an insurance company, or other security to secure the provision and satisfactory completion and maintenance until taken in charge by the local authority of roads, footpaths, watermains, drains, public open space and other services required in connection with the development, coupled with an agreement empowering the local authority to apply such security or part thereof to the satisfactory completion or maintenance of any part of the development. The form and amount of the security shall be as agreed between the planning authority and the developer or, in default of agreement, shall be referred to An Bord Pleanála for determination.

**Reason:** To ensure the satisfactory completion and maintenance of the development until taken in charge.

23. Prior to commencement of development, the applicant or other person with an interest in the land to which the application relates shall enter into an agreement in writing with the planning authority in relation to the provision of housing in accordance with the requirements of section 94(4) and section 96(2) and (3) (Part V) of the Planning and Development Act 2000, as amended, unless an exemption certificate shall have been applied for and been granted under section 97 of the Act, as amended. Where such an agreement is not reached within eight weeks from the date of this order, the matter in dispute (other than a matter to which section 96(7) applies) may

be referred by the planning authority or any other prospective party to the agreement to An Bord Pleanála for determination.

**Reason:** To comply with the requirements of Part V of the Planning and Development Act 2000, as amended, and of the housing strategy in the development plan of the area.

24. Prior to commencement of development, the developer shall lodge with the planning authority a cash deposit, a bond of an insurance company or such other security as may be accepted in writing by the planning authority, to secure the protection of the trees on site and to make good any damage caused during the construction period, coupled with an agreement empowering the planning authority to apply such security, or part thereof, to the satisfactory protection of any tree or trees on the site or the replacement of any such trees which die, are removed or become seriously damaged or diseased within a period of [three] years from the substantial completion of the development with others of similar size and species. The form and amount of the security shall be as agreed between the planning authority and the developer or, in default of agreement, shall be referred to An Bord Pleanála for determination.

**Reason:** To secure the protection of the trees on the site.

25. The developer shall pay to the planning authority a financial contribution as a special contribution under section 48(2) (c) of the Planning and Development Act 2000 in lieu of the provision of public open space within the site. The amount of the contribution shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála for determination. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be updated at the time of payment in accordance with changes in the \*\*\*Wholesale Price Index – Building and Construction (Capital Goods), published by the Central Statistics Office.

**Reason:** It is considered reasonable that the developer should contribute towards the specific exceptional costs which are incurred by the planning authority which are not covered in the Development Contribution Scheme and which will benefit the proposed development.

26. The developer shall pay to the planning authority a financial contribution in respect of public infrastructure and facilities benefiting development in the area of the planning authority that is provided or intended to be provided by or on behalf of the authority in accordance with the terms of the Development Contribution Scheme made under section 48 of the Planning and Development Act 2000, as amended. The contribution shall be paid prior to commencement of development or in such phased payments as the planning authority may facilitate and shall be subject to any applicable indexation provisions of the Scheme at the time of payment. Details of the application of the terms of the Scheme shall be agreed between the planning authority and the developer or, in default of such agreement, the matter shall be referred to An Bord Pleanála to determine the proper application of the terms of the Scheme.

**Reason:** It is a requirement of the Planning and Development Act 2000, as amended, that a condition requiring a contribution in accordance with the Development Contribution Scheme made under section 48 of the Act be applied to the permission

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Karen Kenny  
Senior Planning Inspector

5<sup>th</sup> March 2020

## Appendix 1: Third Party Submissions

Sub - Alan & Donna Rooney

Sub - Alan & Joanne Pitcher

Sub - Alan & Nicola Miller

Sub - Andrew Sheen

Sub - Anna Dangerfield

Sub - Barry & Caitriona Cahir

Sub - Barry & Nicole McGuire

Sub - Brian & Deirdre Rock

Sub - Bruce & Sally-Anne Edwards

Sub - Colin Grant

Sub - Darragh O'Brien TD.

Sub - Emily Grimes

Sub - Eoin Aherne & Siobhan Murphy

Sub - Fergus & Mary Daly

Sub - Gavin & Michelle O'Connor

Sub - Geraldine Foy and Others

Sub - Gillian & Jonny Maguire

Sub - Gillian Whelan

Sub - Ian & Liz Milburn

Sub - Jeremiah Murphy & Yvone Layng

Sub - Johnny & Emily Grimes

Sub - Lee & Caoimhe Hayes

Sub - Louisa Goodliffe & Robert Bullock

Sub - Malahide Community Forum Part

Sub - Martin & Patricia Hickey

Sub - Mary Buckley & Colm Magee

Sub - Matrin Lambe & Rachael Beck

Sub - Niall & Helen Duffy

Sub - Nigel & Vivienne Drummond

Sub - Paul & Linda Fitzgerald

Sub - Paula Fitzsimons

Sub - Philipe & Andrea Miles

Sub - Seamount Abbey Management Company

Sub - Seamus & Mairead Moriarty

Sub - Sean & Margaret Purcell

Sub - Senator Lorraine Clifford-Lee

Sub - Sinead & John Lawless

Sub - Tanya O'Mathuna

Sub - Terence Roche

Sub - Thomas & Naoise Canning