

## Muirin Gowen

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**From:** Shane Duffy <shaneduffy@bradyshipmanmartin.com>  
**Sent:** Thursday 20 August 2026 15:01  
**To:** LAPS  
**Cc:** Pauline Byrne  
**Subject:** ACP-324350-26 - Proposed development of 360 no. residential units Mooretown, Swords, Co. Dublin (Response to Submissions)  
**Attachments:** 7244\_Response to Submissions Report\_Final.pdf  
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Hi Muirín,

Please find attached a *Response to Submissions* report prepared by BSM on behalf of Fingal County Council in relation to ACP Ref. 324350-26 for lands at Mooretown, Swords.

If there are any issues, please let me know.

Thanks,  
Shane

**Shane Duffy**

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Planning Application Under Section  
175 of the Planning and Development  
Act 2000 (as amended) for Phase 2 of  
Mooretown, Swords, Co. Dublin

**RESPONSE TO SUBMISSIONS**

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Client:

Fingal County Council

Date:

20 August 2026

## DOCUMENT CONTROL SHEET

### 7244\_RP01a\_Response to Submissions

**Project No.** 7244  
**Client:** Fingal County Council  
**Project Name:** Planning Application Under Section 175 of the Planning and Development Act 2000 (as amended) for Phase 2 of Mooretown, Swords, Co. Dublin  
**Report Name:** Response to Submissions  
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## 1 Introduction

Brady Shipman Martin (BSM) has prepared this *Response to Submissions* report on behalf of the Applicant, Fingal County Council (FCC). The report addresses concerns and comments raised in submissions received in relation to the proposed residential development at Mooretown, Swords, Co. Dublin.

In total, 11 no. submissions were received, including 6 no. submissions from Prescribed Authorities, and 5 no. submissions from third parties. The responses to the submissions have been prepared for each submission received, with subsections provided thematically, or to reflect sections within the relevant submission.

The responses contained within this report refer to various planning documentation submitted as part of this planning application. It is recommended that these documents be reviewed as needed for more detail in relation to the matters raised.

## 2 Response to Prescribed Authorities Submissions

### 2.1 Dublin Airport Authority (daa)

The submission by daa plc is noted. The submission acknowledges that the site is located Noise Zone D and quotes Objective DAO11 of the Development Plan, which seeks to: *“Strictly control inappropriate development and require noise insulation where appropriate in accordance with Table 8.1 above within Noise Zone B and Noise Zone C and where necessary in Assessment Zone D, and actively resist new provision for residential development and other noise sensitive uses within Noise Zone A,...”*

The reference here is to control ‘*inappropriate development*’,...‘*where necessary in Assessment Zone D*’,... It is not, as noted in the submission, *“to strictly control provision of new residential development and other noise sensitive uses within Zones A, B, C and where appropriate in Zone D.”* In this regard we note that proposed development is located on appropriate RA – Residential Area zoned lands where the objective is to: *“Provide for new residential communities subject to the provision of the necessary social and physical infrastructure.”*

We further note that the application relates to Phase 2 lands (of a two-phase development, where Phase 1 is under construction), which are centrally located within an established and emerging residential suburb of west / northwest Swords.

The following has been provided by AWN, who prepared Chapter 13 of the EIAR (Noise):

Baseline noise levels across the development site set back from road traffic noted a low noise environment with no notable contribution from overhead aircraft noise. The reviewed Dublin Airport Aircraft Noise Annual Contours (published by Fingal County Council mapping) categorise the noise environment across the site as below 40 dB  $L_{night}$  and below 49 dB  $L_{den}$ . Whilst the townland of Mooretown is listed as an area located within Zone D of the Fingal Development Plan 2023, the proposed development site lies outside (to the north of) the published Zone D aircraft noise contour. As discussed in Chapter 13 of the EIAR, Zone D night-time aircraft noise levels are quoted in the range of 40 to 48 dB  $L_{Aeq,8hr}$  and 50 to 54 dB  $L_{Aeq,16hr}$  for daytime periods. As the specific development site lies to the north of the mapped Zone D contour, the aircraft noise levels are less than or equal to 40 dB  $L_{Aeq,8hr}$  at night. This is in line with the assessment assumptions within the EIAR. On this basis, standard residential construction specifications, including standard double glazing and ventilation provisions, were specified for these residential units. The assessment demonstrated that the recommended

internal noise guidelines set out in BS 8233:2014 and ProPG can be achieved within the proposed dwellings.

In the unlikely event the future noise environment lie within the higher end of the Zone D noise contours (i.e. 54dB  $L_{Aeq,16hr}$  daytime and 48 dB  $L_{Aeq,8hr}$ , night-time), the same conclusions are made relating to the building construction and sound insulation. This scenario would only be realised if a change to the airport operations occurred.

Furthermore, the worst case daytime aircraft noise level associated with Zone D is below the external amenity area guideline value of 55 dB  $L_{Aeq,16hr}$  set out in ProPG and BS 8233:2014. Accordingly, appropriate internal and external residential amenity can be achieved throughout the proposed development in accordance with the relevant guidance and planning policy requirements.

In conclusion, potential noise impact, including from inward noise, has been addressed in Chapter 13 of the *Environmental Impact Assessment Report (EIAR)* prepared by Brady Shipman Martin. The submission by daa plc acknowledges the findings of the assessment that:

*“The inward noise impact assessment shows that the main influencing source for future residents will be road traffic noise. Acoustic design measures such as appropriate glazing and ventilation specifications have been identified to ensure internal noise environments meet the required standards.”*

We believe that the issue of noise, including inward noise has been adequately addressed in the EIAR and in the application. We would not accept that the proposed conditions recommended by daa plc should be applied and such conditions are neither appropriate nor required.

## 2.2 Department of Housing, Local Government and Heritage (Development Applications Unit)

The Development Applications Unit (DAU) of the Department of Housing, Local Government and Heritage notes the presence of archaeological remains within the development site, and on the basis of the proposed mitigation measures as outlined in Chapter 15.5 of the *Environmental Impact Assessment Report (EIAR)* prepared by Brady Shipman Martin, suggests that a planning condition related to archaeological preservation in situ.

Having reviewed the proposed condition wording, the Applicant has no objections to such a condition being imposed by An Coimisiún Pleanála (ACP), should it be deemed to be appropriate.

## 2.3 Inland Fisheries Ireland (IFI)

The IFI highlight the hydrological connection to the Broadmeadow River via the Mooretown Stream. The *Environmental Impact Assessment Report (EIAR)* prepared by Brady Shipman Martin and the *Construction Environmental Management Plan* prepared by AKM Design Group detail mitigation measures proposed regarding potential impacts to the local watercourses and by extension, the Broadmeadow River.

Regarding foul and storm water arrangements, Uisce Éireann have issued a Confirmation of Feasibility (COF), which confirms that sufficient capacity is available to service the proposed development, subject to upgrades. This documentation was submitted as part of the planning application to ACP.

The Applicant notes other comments and suggestions from the IFI including referring to guidelines for construction and a request for the appointment of an Ecological Clerk of Works (ECoW).



## 2.4 Irish Aviation Authority (IAA)

The Applicant notes that under its obligations to notify Prescribed Authorities of the proposed development, the DAA and AirNav Ireland were both notified of the submission of the subject planning application to ACP. The DAA subsequently provided a submission, however AirNav Ireland did not. The Applicant remains committed to working with relevant stakeholders to ensure the successful delivery of the proposed development, subject to planning consent.

The Applicant further notes concerns raised regarding the wildlife hazard assessment zone for Dublin Airport and would welcome a condition from ACP as it deems appropriate in this regard. The Applicant also confirms its obligations to notify the DAA, AirNav Ireland and the IAA of intention to commence crane operations within at least 30 days' notice prior to their erection.

## 2.5 Transport Infrastructure Ireland (TII)

The Applicant notes the submission received from TII, including highlighting to ACP the provisions of Chapter 3 of the *Spatial Planning and National Roads Guidelines for Planning Authorities*, in addition to noting that the National Transport Authority (NTA) has competency in matters relating to future LUAS, metro and BusConnects alignments.

## 2.6 Uisce Éireann

Uisce Éireann notes a *Confirmation of Feasibility* (COF) has been issued to the Applicant in August 2025. Regarding the suggested conditions:

1. Entering into a Connection Agreement: The Applicant has no objection to inclusion of such condition should ACP deem it appropriate;
2. Internal infrastructure currently under construction: The Applicant notes that this suggested condition appears to refer to permitted works already under construction, and as such, it would not be acceptable to impose a condition relating to such works;
3. Submission of a Water Supply Infrastructure Masterplan and Wastewater Infrastructure Masterplan: The Applicant notes this proposed condition and has no objection to inclusion of such condition should ACP deem it appropriate;
4. Installation and operation of Glen Ellen Road Storage Tank: The Applicant notes this proposed condition and has no objection to inclusion of such condition should ACP deem it appropriate;
5. Compliance with Uisce Éireann Standard Details and Codes of Practice: This is a standard condition, and the Applicant has no objection to inclusion of such condition should ACP deem it appropriate; and
6. Requirement for additional COF should build over or near to water assets or for diversion of assets be proposed: The Applicant does not intend to invoke this requirement but has no objection to inclusion of such a condition should ACP deem it appropriate.

## 3 Response to 3<sup>rd</sup> Party Submissions

### 3.1 Cllr. John Smyth

The Applicant notes that the submission from Cllr. John Smyth has been prepared having undertaken some consultation with local residents and welcomes feedback that the proposed residential development is welcomed.



### 3.1.1 Unit Mix

Regarding the proposed unit mix, the proposed development has been designed in accordance with relevant planning policy and guidelines, as set out in the *Planning Report and Statement of Consistency* prepared by Brady Shipman Martin and documentation submitted with the application, which permits the unit mix as proposed. The proposed development includes a mix of unit types and sizes to provide for a vibrant community, whilst also addressing residential demand for units with fewer beds and local housing needs.

### 3.1.2 Metrolink Delivery

The delivery of Metrolink will be transformative for Swords, and the submission notes that delivery of this completed project could remain some time away, however current estimates place completion around mid-to-late 2030's. Whilst the alignment of Metrolink is toward the eastern part of Swords, connections to and from stations will form an important element of the development of Swords, including active travel and onward public transport connections.

### 3.1.3 Crèche, Schools and Community Infrastructure

Regarding the proposed crèche, the Applicant welcomes positive feedback from Cllr. Smyth. The proposed crèche has been sized in accordance with applicable guidelines, including the *Childcare Facilities Guidelines for Planning Authorities (2001)*. The exact nature of operations of the crèche (i.e not-for-profit, or commercial entities) is not a planning consideration at this time.

As regards the *Community and Social Infrastructure Report and Schools and Childcare Audit* prepared by Brady Shipman Martin, the purpose of the report is understanding the existing facilities in the area. Whilst the concerns raised by Cllr. Smyth regarding capacity are noted, this would be a matter for consideration for the Health Service Executive (HSE) regarding service provision.

Similarly, the report sets out local education facilities in the area and indicates proposed facilities, as planned by the Department of Education and Youth (DEY) as per their March 2026 update on *Current Status of Large-Scale Projects being Delivered under the School Capital Programme*. The management of school place demand is a matter for the DEY, who would be aware of the ongoing development in the area, and consider said developments in the assessment for additional capital infrastructure development. Matters relating to provision of school places is within the remit of the DEY.

Concerns regarding provision of community space are noted. The subject site seeks to deliver significant community infrastructure in the form of new connections (including active travel), public open space, parklands centred on the archaeological remains on site, and residential and crèche facilities, all set within the immediate context and wider context of the Swords area. Given the site constraints, it would not be appropriate on this particular site to deliver further community space, including playing pitches.

### 3.1.4 Infrastructure Delivery

The proposed development has been designed in accordance with best practice regarding the assessment of existing and proposed transport links, and in accordance with the Fingal Development Plan. Such transport infrastructure investments have proceeded on the understanding that they will serve future developments such as Mooretown, and it would not be usual to have such projects being developed in tandem.

### 3.1.5 Cumulative Assessment

The cumulative development of the wider Mooretown area has been considered in the preparation of the planning application documentation, which is outlined in the *Environmental Impact Assessment Report (EIAR)* prepared by Brady Shipman Martin, which details the cumulative assessment undertaken, which is considered throughout the chapters of the EIAR.



### 3.1.6 Proximity and Connection to Existing Residential Development

Regarding the boundaries of existing developments, the proposed development has been designed in accordance with all relevant guidelines, policies and design standards, with building setbacks generally exceeding 16m where possible from existing buildings, which minimises the possibility of overlooking, loss of residential amenity or overshadowing. The proposed heights of the development are appropriate (predominantly 2-3 storey), with the 1 no. apartment blocks (4-5 storeys) located closer to the centre of the site, at a distance from existing residential boundaries.

In relation to connections to existing residential neighbourhoods, there are no proposed plans for any connections at this time to the existing neighbourhoods of Cianlea and Lioscian, however there are locations indicated where such connections could be delivered in the future if required. Notwithstanding this, it is the Applicant's position that pedestrian and cycle permeability can bring significant benefit to both future and existing residents, which is why indicative locations are shown.

## 3.2 Flávia Nunes & Derek Philips

The submission from Flávia Nunes and Derek Philips appears to also make reference to connections that are not proposed as part of the subject planning application. The submission states that the proposed development would *"open the Lioscian estate to provide access, connectivity or additional traffic associated with this development"*. The proposed development does not seek to create any connections between Mooretown and Lioscian. The proposed development drawings show an indicative location where a future pedestrian/cycle link only, could be added in the future, however this does not form a part of this application at this time.

### 3.2.1 Traffic Congestion and Road Safety

The proposed development does not include any vehicular connection to the Lioscian estate and will not increase traffic movements through the estate.

### 3.2.2 Pressure on Public Transport

The subject planning application is accompanied by a *Traffic and Transportation Assessment* prepared by Transport Insights, which includes an examination of existing public transport capacity (Appendix B – Public Transport Capacity Study), concluding that existing public transport capacity could absorb the predicted usage, with future investment in infrastructure and services benefiting existing and future residents alike.

### 3.2.3 Cumulative Impacts

The cumulative development of the wider Mooretown area has been considered in the preparation of the planning application documentation, which is outlined in the *Environmental Impact Assessment Report (EIAR)* prepared by Brady Shipman Martin, which details the cumulative assessment undertaken, and is considered throughout the chapters of the EIAR.

### 3.2.4 Environmental and Residential Amenity

As previously stated, the proposed development does not 'open the estate' to either construction or operational traffic. That said, the *Environmental Impact Assessment Report (EIAR)* prepared by Brady Shipman Martin clearly demonstrates that traffic-related noise, air pollution and disturbance has been assessed.



### 3.2.5 Waste, Drainage and Infrastructure Capacity

The application as submitted includes detailed drawings and reports pertaining to utilities and infrastructure prepared by AKM Design Group. A *Confirmation of Feasibility* has also been provided by Uisce Éireann which confirms the development can be served by the public network subject to upgrades. In summary, the proposed development can be served without negatively affecting existing residents.

### 3.2.6 Community Infrastructure

The planning application as submitted includes a *Community and Social Infrastructure Report and Schools and Childcare Audit* prepared by Brady Shipman Martin. This report identifies facilities in the area including schools, GP offices, childcare facilities and recreational infrastructure. The proposed development includes a crèche that has been sized accordingly to accommodate the anticipated childcare needs of both Mooretown Phases 1 and 2 and includes extensive public open space for recreation. Matters relating to capacity of healthcare facilities are within the remit of the HSE and similarly provision of school places is within the remit of the DEY.

## 3.3 Gerard Wallace

The Applicant welcomes the positive comments received in the submission. Regarding concerns raised about pest control during construction, the Applicant notes this has been considered when preparing the planning application documentation. The *Construction & Environmental Management Plan* prepared by AKM Design Group states that pest control measures will be put in place during construction, with regular inspections. Should any neighbours to the site have concerns about pest control during construction, a complaints and environmental records procedure will be maintained for the duration of the works to log any incidents for records and investigation by the contractor. Please refer to Section 8.9 of the CEMP prepared by AKM Design Group.

## 3.4 Maria McKittrick

The Applicant notes the concerns raised in the submission from Maria McKittrick.

Where car parking is proposed within the subject site adjacent to the boundary wall of No. 79 Cianlea, a further 2m high concrete block wall will be constructed within the subject site, adjacent the existing boundary wall.

Where an existing boundary wall separates no. 79. Cianlea and the proposed open space within the site, the boundary wall will be retained in its current form. As this is an established boundary wall and no structures are proposed at this location, there is no proposal to increase its height.

Please refer to **Figure 3-1** which is an extract from the proposed boundary treatment plan, with some additional annotation by BSM generally outlining the property of no. 79. Cianlea.

Regarding the request for a sound barrier, the EIAR (Chapter 13: Noise) assessed the noise of sensitive receptors, including neighbouring residential properties. It concluded that regarding the operational traffic noise post-construction of the proposed development (with which concerns are raised in this submission) the impacts will be negligible, long-term and not-significant. Please refer to the *Environmental Impact Assessment Report (EIAR)* prepared by Brady Shipman Martin for more detailed information.



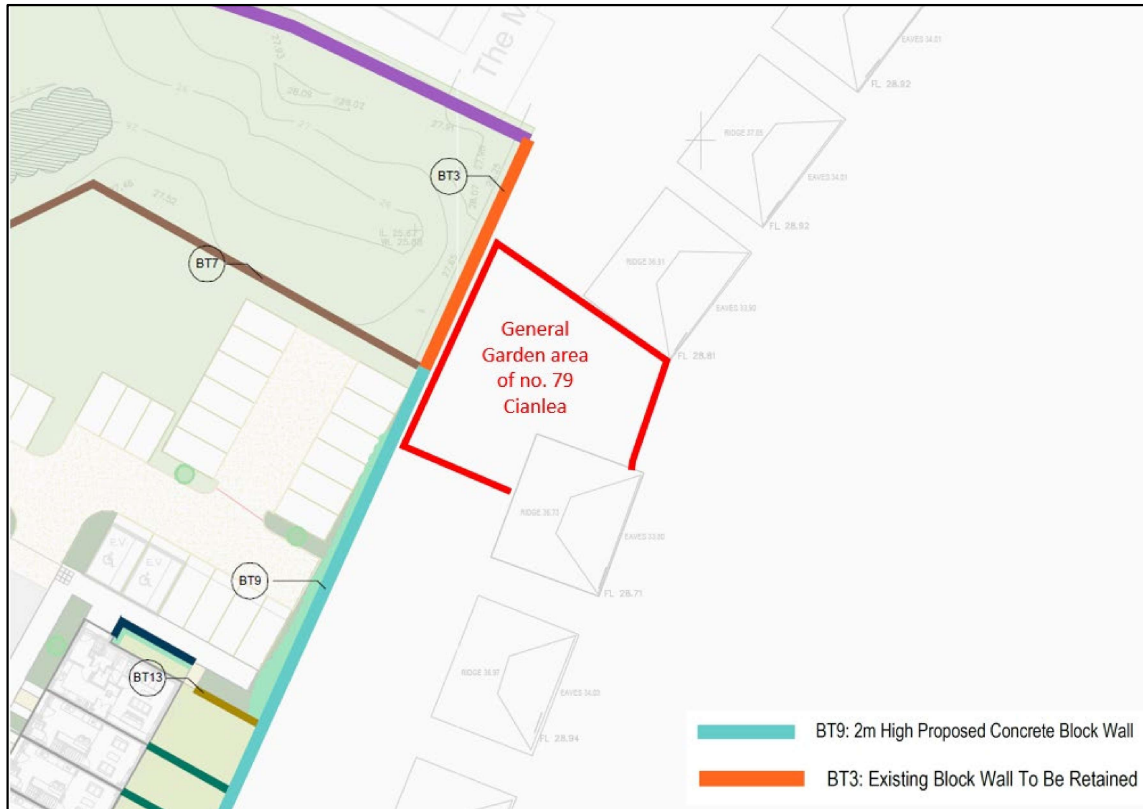


Figure 3-1: Extract from drawing no. L102, prepared by Simon Ronan Landscape Architects (with additional annotation by BSM)

### 3.5 Sinéad Murray

#### 3.5.1 Impact on Privacy and Overlooking

The proposed structures located along the site boundary have been designed in accordance with all relevant guidelines on set-back distances, as set out in the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities*. These guidelines have been prepared to ensure that there is no undue overlooking or loss of privacy for residents of units backing on to each other.

#### 3.5.2 Loss of Light and Overshadowing

The buildings proposed along the boundary of the site in question (adjacent to Lioscian) are 2-storey buildings. The existing houses in Lioscian are also 2-storeys in height. The proposed units are also suitably setback from the boundary of the site, in accordance with the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities*.

A *Daylight and Sunlight Assessment* was prepared by Modelworks to accompany the subject planning application, which included an assessment of potential loss of daylight and sunlight for existing buildings and gardens, including houses in very close proximity to the property owned by Sinéad Murray, which found that the impact to daylight for existing houses would be negligible, the impact to sunlight for existing buildings would be negligible. Furthermore, it found that regarding existing gardens and amenity areas, the impact to sunlight would be negligible also.

Therefore, it is set forth that the proposed development will not unduly impact daylight or sunlight for existing residents in Lioscian.

### 3.5.3 Scale, Height and Visual Impact

The buildings proposed along the boundary of the site in question (adjacent to Lioscian) are 2-storey buildings. The existing houses in Lioscian are also 2-storeys in height. The proposed units are also suitably setback from the boundary of the site, in accordance with the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities*, and as such, are not considered to be 'overbearing' or creating a 'visual barrier' to existing residents nearby.

### 3.5.4 Drainage and Ground Levels

The proposed development has been designed to ensure that the stormwater discharge rate (Qbar) is no greater than Qbar of the site as it exists undeveloped. The proposed development has extensive Sustainable Urban Drainage Systems (SuDS) including attenuation basins and tanks, tree pits, and existing ditches and hedgerows. In summary, this will not result in any additional run-off from the site.

### 3.5.5 St. Cronin's Well

St. Cronin's Well is a site of archaeological importance and has been extensively surveyed by qualified archaeological experts. The proposed development has been laid out in such a way that the well is not impacted, and remains in situ, including surrounding vegetation, as detailed on the proposed site layout plans.

### 3.5.6 Interlinking Estates

With regard to connections to existing neighbourhoods as raised in this observation, there are no proposed plans for any connections at this time to the existing neighbourhoods of Cianlea and Lioscian, however there are locations indicated where such connections could be delivered in the future if required. Notwithstanding this, it is the Applicant's position that pedestrian and cycle permeability can bring significant benefit to both future and existing residents, which is why indicative locations are shown.



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