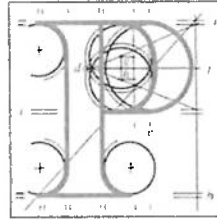


Our Case Number: ACP-324350-26



An
Coimisiún
Pleanála

Concerned residents in the adjacent estates
c/o Councillor John Smyth
County Hall
Swords
Co. Dublin
K67 X8Y2

Date: 16 July 2026

Re: Proposed development of 360 no. residential units

Mooretown, Swords, Co. Dublin

Dear Sir / Madam,

An Coimisiún Pleanála has received your recent submission in relation to the above-mentioned proposed development and will take it into consideration in its determination of the matter. Please accept this letter as a receipt for the fee of €50 that you have paid.

Please note that the proposed development shall not be carried out unless the Commission has approved it or approved it with conditions.

If you have any queries in relation to the matter, please do not hesitate to contact the undersigned officer of the Commission at laps@pleanala.ie.

Please quote the above-mentioned An Coimisiún Pleanála reference number in any correspondence or telephone contact with the Commission.

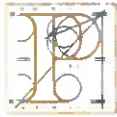
Yours faithfully,

Muirín Gowen
Executive Officer
Direct Line: 01-8049323

JA02

Teil	Tel	(01) 858 8100
Glao Áitiúil	LoCall	1800 275 175
Láithreán Gréasáin	Website	www.pleanala.ie
Ríomhphost	Email	communications@pleanala.ie

64 Sráid Maoilbhríde	64 Marlborough Street
Baile Átha Cliath 1	Dublin 1
D01 V902	D01 V902



An
Coimisiún
Pleanála

Large-scale Residential Development Appeal Observation

Online Reference
LRD-OBS-006521

Online Observation Details

Contact Name
john smyth

Lodgement Date
13/07/2026 20:53:58

Case Number / Description
324350

Payment Details

Payment Method
Online Payment

Cardholder Name
john Smyth

Payment Amount
€50.00

Fee Refund Requisition

Please Arrange a Refund of Fee of

€

Lodgement No

LDG—

Reason for Refund

Documents Returned to Observer

☐

Yes

☐

No

Request Emailed to Senior Executive Officer for Approval

☐

Yes

☐

No

Signed

EO

Date

Finance Section

Payment Reference

ch_3TspvOB1CW0EN5FC18sjou3W

Checked Against Fee Income Online

EO/AA (Accounts Section)

Amount

€

Refund Date

Authorised By (1)

SEO (Finance)

Authorised By (2)

Chief Officer/Director of Corporate Affairs/SAO/Board
Member

Date

Date

Cllr John Smyth

County Hall,

Main St, Swords

K67 X8y2

RE: An Coimisiún Pleanála - Case reference: JH06F.324350

Please find below an observation on behalf of concerned residents which we represent in the adjacent estates to the proposed development referenced above. Throughout all discussions regarding this development it is important to note that both myself and residents welcome the construction of new homes in the area and acknowledge the desperate need to tackle the ever growing housing and homelessness crisis that the nation is facing. The fact that these 360 units are all to be social or affordable homes is particularly commendable in this current climate. Local Authorities should be the predominant force in the housing industry. It is always the case however that adequate infrastructure must be built prior to or in tandem with new developments in order to create communities that can thrive into the future and integrate with more established estates.

I welcome the close alignment to the compact urban growth requirements of the National Planning Framework but this is not without its inadequacies. I query if the 4% ratio applied to the number of 4 bed units is adequate and note that much of the rationale for applying such requirements to a town such as Swords pivots on the delivery of the Metro link, which could be the best part of another 2 decades away from delivery and arguably will struggle to service the western aspects of the town. No data is presented to justify the beds per unit ratios applied

Again it is important to welcome the inclusion of a 670 sq.m. crèche in this development. A worrying trend over the past few decades whereby developers stick to the 20 places per 75 dwellings ratio which often results in creches that are not commercially viable. Similarly, many later argue that this incorrectly reflects a lack of demand. I strongly believe facilities like this should be specified as being operated as a not for profit entity, reflective of the cost of childcare for young families during a general cost of living crisis. It is also pertinent to highlight the apparent flaws in the Social Infrastructure Audit which has been included in the application. A desktop audit of healthcare facilities close to the area does not reflect whether these facilities are operating close to, near or well beyond capacity. For example many GP surgeries in Swords are not accepting new patients and thus the mere presence of this isn't reflective of capacity. Likewise as I have highlighted on numerous occasions at the Dublin and North East Region HSE Fourm many primary and secondary care services

provided by the HSE in the Swords area have massive waiting lists and insufficient staffing to meet the community's needs.

Similarly such an audit is not reflective of the true capacity of local schools. In 2025-2026 school year I am aware through my own discussion with principals that at a primary level there was some space in a number of schools in north Swords however this is not indicative of a similar trend going forward or if the capacity is sufficient for the additional school children which may move to the area. The use of average calculations is not taking into account the potential growth from other close developments planned or currently under constructions . In effect all these developments are using the same theoretical capacity while not accounting for each others demand.

Another social infrastructure deficit in the area is the lack of sufficient community and sporting facilities. We have long been arguing for the creation of community space at the north pitches of the Ward Rivervalley park. The current community centres in Swords more broadly are operating at capacity at peak times and thus demand again is outstripping supply . A recent sports audit carried out by FCC noted some 9 additional pitches were needed in the area.

From a Transport perspective I believe there is a critical flaw in many applications like this as there is a reliance on transport links and infrastructure that have not yet been delivered. The application highlights connectivity to the "Swords Western Distributor Road" and relies on future transit networks to justify its density and reduced car dependency. Although this may start construction on the first phase it is still a number of years away and could be a decade before the majority of the road is realised. Likewise there has been no work completed yet on an additional orbital road north of this area. Approving high-density development based on proposed or partially built transport routes leads to severe localized congestion. Until the distributor road is fully operational and dedicated high-frequency bus routes (or MetroLink) are actively servicing the Rathbeale Road corridor, the reality is that these 360 households will be heavily car-dependent, overwhelming the existing local road network. Thankfully there is more sufficient car parking to unit ratio of 1.6 spaces then in comparison to some comparable developments proposed. Long term however this ratio may still be problematic as we have seen in more mature developments close by such as Glen Ellen and Brides Glen where insufficient parking has led to ongoing conflict between residents

The cumulative impact of concurrent developments is not fully considered across the application. When these concurrent sites are combined, thousands of new residents are being introduced to the Rathbeale/Mooretown catchment simultaneously. The local road network and social infrastructure have not been upgraded to handle a population increase of this magnitude in such a condensed timeframe. This isnt even considering

the larger Swords area which is seeing developments at the West Estuary lands, Barrysparks and Fosterstown

The concerns raised most with us by residents are an apparent disregard for the boundaries to other existing homes and the potential drawbacks of uncontrolled permeability between the new development and adjacent established estates, in particular those living in Cianlea and Lioscian. The closeness of new structures to established property lines will result in severe overlooking, a loss of privacy in private rear gardens, and potential overshadowing during winter months. A more generous buffer zone, enhanced mature planting, and stepping down the heights of buildings would be a welcomed adjustment. Uncontrolled permeability is seen as a negative by some residents as poorly monitored pedestrian links frequently become "rat runs" for anti-social behavior, escape routes for localized crime, and conduits for illegal scrambler bikes as has been seen in the area in the past. Residents in formerly secure, quiet cul-de-sacs are having their safety and peace compromised by these forced thoroughfares. We recognise the benefits of permeability as well but such should be strictly designed to prevent motorized access and loitering.

In summary there are many positives to this application that other developments could take note of but we believe with minor adjustments the issues raised here could be rectified

Regards

Cllr John Smyth

Sinn Féin Councillor for the Swords LEA