

D C W N E Y

PLANNING STATEMENT

**Proposed Strategic Housing Development
on Lands at Oldtown, Swords,
Co. Dublin**

Applicant: Gerard Gannon Properties

March 2022

TABLE OF CONTENTS

1.0	INTRODUCTION	3
2.0	SITE LOCATION & DESCRIPTION	5
3.0	PLANNING HISTORY	7
3.1	Planning Applications pertaining to the Subject Site.....	7
3.2	Planning Applications pertaining to the Oldtown and Mooretown lands	8
4.0	PRE-APPLICATION CONSULTATION	9
4.1	Pre-application Consultation with Fingal County Council.....	9
4.2	Part V Engagement	10
4.3	Pre-Application Consultation with An Bord Pleanála	10
5.0	DESCRIPTION & MERITS OF THE PROPOSED DEVELOPMENT	12
5.1	Description of Proposed Development.....	12
5.2	General Layout.....	14
5.3	Building Height and Form	15
5.4	Communal and Public Open Space	16
5.5	Private Open Space	18
5.6	Density	18
5.7	Unit Mix.....	19
5.8	Car & Bicycle Parking	20
5.9	Residential Amenities	21
5.10	Materials & Finish	21
6.0	LOCAL PLANNING POLICY CONTEXT	21
6.1	Fingal Development Plan 2017-2023	22
6.2	Oldtown-Mooretown Local Area Plan 2010-2016 (extended to July 2020)	37
7.0	ENGINEERING PROPOSALS	37
8.0	APPROPRIATE ASSESSMENT SCREENING.....	38
9.0	EIA SCREENING	38
10.0	CONCLUSION	39

© Downey 2022

Downey Planning Document Control			
	Name	Date	Version
Prepared by	Elahe Saki MIPI Consultant Planner	08/02/2022	DRAFT_V01
	Elahe Saki MIPI Consultant Planner	03/03/2022	DRAFT_V02
	Elahe Saki MIPI Consultant Planner	25/03/2022	DRAFT_V03
Approved by	Eva Bridgeman MIPI Director	15/02/2022	DRAFT_V01
	Eva Bridgeman MIPI Director	10/03/2022	DRAFT_V02
	Eva Bridgeman MIPI Director	31/03/2022	FINAL_V03

1.0 INTRODUCTION

Downey, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this Planning Statement, on behalf of the applicant, Gerard Gannon Properties to accompany a planning application to An Bord Pleanála for a proposed Strategic Housing Development on lands at north of Rathbeale Road and to the west of and north of Miller's Avenue and Glen Ellan Road, Oldtown, Swords, Co. Dublin, with associated engineering works on lands locally known as the Celestica/Motorola site, junction of Glen Ellan Road and Balheary Road, and at/on Balheary Road, Swords, Co. Dublin (the application site).

This application is accompanied by a comprehensive range of documentations which specifically seek to address the requirements of the Planning and Development (Housing) and Residential Tenancies Act 2016, the Planning and Development (Strategic Housing Development) Regulations 2017, items raised by the Planning Authority and An Bord Pleanála during the pre-application consultations, national and regional planning policy and guidelines, and the Fingal Development Plan 2017-2023.

The proposed development subject to this SHD application provides for construction of a total of 377 no. residential dwellings, comprising 173 no. houses (9 no. 2 beds, 147 no. 3 beds, and 17 no. 4 beds), 204 no. apartment/duplex units (98 no. 1 beds, 104 no. 2 beds, and 2 no. 3 beds), with 1 no. childcare facility and associated car parking and bicycle parking, landscaping, boundary treatments, and all associated engineering and site development works necessary to facilitate the development including the proposed stormwater storage tank and overflow outfall gravity sewer to the Broadmeadow River with associated manholes on lands locally known as the Celestica/Motorola site, junction of Glen Ellan Road and Balheary Road, and at/on Balheary Road, along with the proposed vehicular/service access onto Balheary Road.

The layout of the proposed residential scheme benefits from a variety and diversity of unit mix which will provide for demanded housing, on an inclusive basis, and will achieve robustness, in terms of adaptability and variation over time. The form and buildings envelope of the proposed residential scheme will be three storey duplex blocks and five storey apartments which offers a harmonic landscape based on a clear pattern of housing cells arranged around a legible street and open space hierarchy, in which interest areas stand out due to prominent build forms.

The proposed compact urban form allows for apartments and duplex units to be stitched into streetscapes that are legible and characterised by traditional terraces of housing to ensure the delivery of a total number of dwellings significant enough to sustain the existing and future road and drainage infrastructure and neighbourhood facilities of Swords. Design and materials will be of a high quality and there will be a mixture of unit configurations across the site to avoid a homogenous block appearance and to facilitate the various type of family units that will ultimately occupy the units. It is proposed to provide 377 no. units across a mix of one, two, and three bed apartments and duplexes, and two to four bed houses providing for a mix of units.

This Planning Statement outlines the context of the subject site, the background and rationale of the proposed development and provides a summary as to how it complies with the relevant planning policy and guidelines. It should be read in conjunction with the accompanying detailed documentation prepared by the design, landscape, and engineering teams.

The scheme has been prepared by a multi-disciplinary design team and has been subject to pre-planning consultation with the local authority and An Bord Pleanála. The proposed scheme has evolved and improved as a result of Stage 1 and Stage 2 meetings and numerous internal design team meetings. This has ensured that a well-considered and appropriate form of development can be developed and that will help to integrate with the future development of the wider Swords area. The design team is as follows:

- CCK Architects - Project Architect
- Doyle O'Troithigh Landscape Architecture- Landscape Architecture
- Waterman Moylan - Civil, Structural, Traffic, Mechanical, and Electrical Engineers
- Dr. Pamela Bartley of Hydro-G – Hydrologist and Hydrogeologist
- Downey - Planning Consultant
- Model Works - CGI and Photomontage Consultants
- Digital Dimensions - Photomontage Consultants
- OPENFIELD Ecological Services and Hugh Delaney - Ecological Consultant
- Courtney Deery Heritage Consultancy Ltd. - Archaeology Consultants
- The Tree File Ltd. – Arboricultural Consultants
- DKP_{EV} – Specialist Consultants (Noise, Air, Daylight/Sunlight, etc.)

It is submitted the proposed development offers an efficient use of appropriately zoned lands within the development boundary of Swords. The subject lands are located in Oldtown, Swords, Co. Dublin, and within the administrative area of Fingal County Council. With an approximate area of 10.22 ha, the subject site is situated to the north of Rathbeale Road and within an existing built-up area of Oldtown-Mooretown lands to the western development boundaries of Swords. Access to the site is currently via the Glen Ellan Road and Miller's Avenue, a partly completed link road that is also known as the Western Distributor Link Road (WDLR). There is also access to the site through Miller's Glen estate, to which the proposed scheme is an extension. The subject site is bounded by Miller's Avenue to the east, Phase 4C of the overall residential scheme on the Oldtown lands (Reg. Ref. F17A/0687) to the northeast, agricultural lands zoned for the Swords Regional Park to the west, and the Rathbeale Road to the south.

The application site therefore enjoys an excellent level of connectivity to the R125 (Rathbeale Road) which gives access to Swords town centre, and the adjoining developments that prevents creating an isolated community. Swords town centre is located c. 3km to the southwest of the lands. The lands are served by Dublin Bus and Swords Express services as well as existing pedestrian connectivity throughout the Oldtown lands, thus rendering the subject site easily accessible to pedestrians and cyclists.

This report sets out the planning rationale and justification for the proposed development and demonstrates how it accords with the proper planning and sustainable development of the area. This Statement should be read in conjunction with the plans, drawings, and documentation submitted as part of the overall planning pack.

2.0 SITE LOCATION & DESCRIPTION

The subject site is located to the north of the Rathbeale Road, Oldtown, Swords, Co. Dublin, and within the administrative area of Fingal County Council. Oldtown is a townland on the western edge of Swords, north of Glen Ellan Road, south of the Broadmeadow River and bounded to the east by the housing estates of Castleview and Ashton (built in the early 2000s). The lands to the west and north of the site are agricultural, mostly arable farmland. The site is accessed from Glen Ellan Road and from Miller's Avenue which will ultimately connect Brackenstown Road in the south to Lissenhall in the north of Swords. It has been constructed for its entire length within the Oldtown lands and will be completed and opened in tandem with this phase. Short sections of this road to the north are already open to the public. Upgrade works to Rathbeale Road, including the southernmost leg of Miller's Avenue connecting Glen Ellan Road and the Rathbeale Road crossroads are complete.

The subject lands are part of a larger landholding within the ownership of Gerard Gannon Properties. Substantial development of the Oldtown zoned lands has occurred since 2013. To date, 647 dwellings have been constructed and completed to the east of the site, comprising the smaller neighbourhoods of "Miller's Glen" (Reg. Ref. F11A/0436), "Longview" (Reg. Ref. F13A/0185), and "Meadowbank" (Reg. Ref. F17A/0735, F17A/0666 and F17A/0687). The current construction phase is "Westmill" located to the northeast of the site, (Reg. Ref. F11A/0473), and the first 32 of 140 dwellings in this new character area are ready for occupation. There is an existing school campus on Glen Ellan Road, comprising two primary schools (Swords Educate Together and Gaelscoil Bhrian Boroimhe) and a community hall, which forms the southern edge of the new village centre. The civic square, "Miller's Square", and two of three separate mixed-use apartment buildings on the square are complete. A large convenience store has recently opened, and a two storey creche has been constructed to shell and core, ready for a tenant.

To the north and immediately adjacent to the subject site is a new playing pitch, changing rooms (under construction), a MUGA (mixed-use games area), landscaped open spaces, walking routes, and calisthenics equipment and two playgrounds (also under construction). This is an 8.6 ha public park that is the first phase of the future Swords Regional Park and is programmed for completion in April 2022. The park will open to the public in tandem with a second significant public park, the Rathbeale Archaeology Park, which is a 3.5 ha park to the east of the school campus.

The overall development at Oldtown includes a cumulative total of 967 no. dwellings, 5 no. crèches and the commercial centre. The subject site is the final plot of development lands in Oldtown. Thus, this proposed scheme is contributing to the completion of the Oldtown lands, proposing 377 no. residential units, a childcare facility of 519 sqm, and overall of 0.8 ha amenity space spread across the lands with the remaining to be developed on the OS zoned lands to the north of the site. The lands are served by Dublin Bus and Swords Express services as well as existing pedestrian connectivity throughout the Oldtown lands, thus rendering the subject site easily accessible to pedestrians and cyclists.

The lands to the south of the subject site and the Rathbeale Road are also undergoing significant development, i.e., Mooretown lands with planning permissions granted for a large new school campus, dwellings, and creches.

The application site has been in constant agricultural arable use until part of the site was recently developed as described below. The site forms part of a 70-acre field that was once known as the 'big potato field'. The lands slope from +33.246 OD in the south to +15.5 OD in the north, levelling out to a relatively flat area. Long distance views exist to the rural lands in the north and the lines of mature trees along the Broadmeadow and Saucerstown streams.

There are no existing hedges or mature trees of note on the site. An historic townland boundary crosses the northeast of the site and continues as the natural boundary between the development lands and the regional park. The ditch and hedge that demarcated the townland boundary in this part of the Oldtown site were removed some time ago to facilitate underground ESB cables. It is proposed that this section of townland boundary is reinstated by new hedgerow planting for the greater part, and recorded by its integration into the site layout and street pattern for the short stretch that occurs in the urban plan.

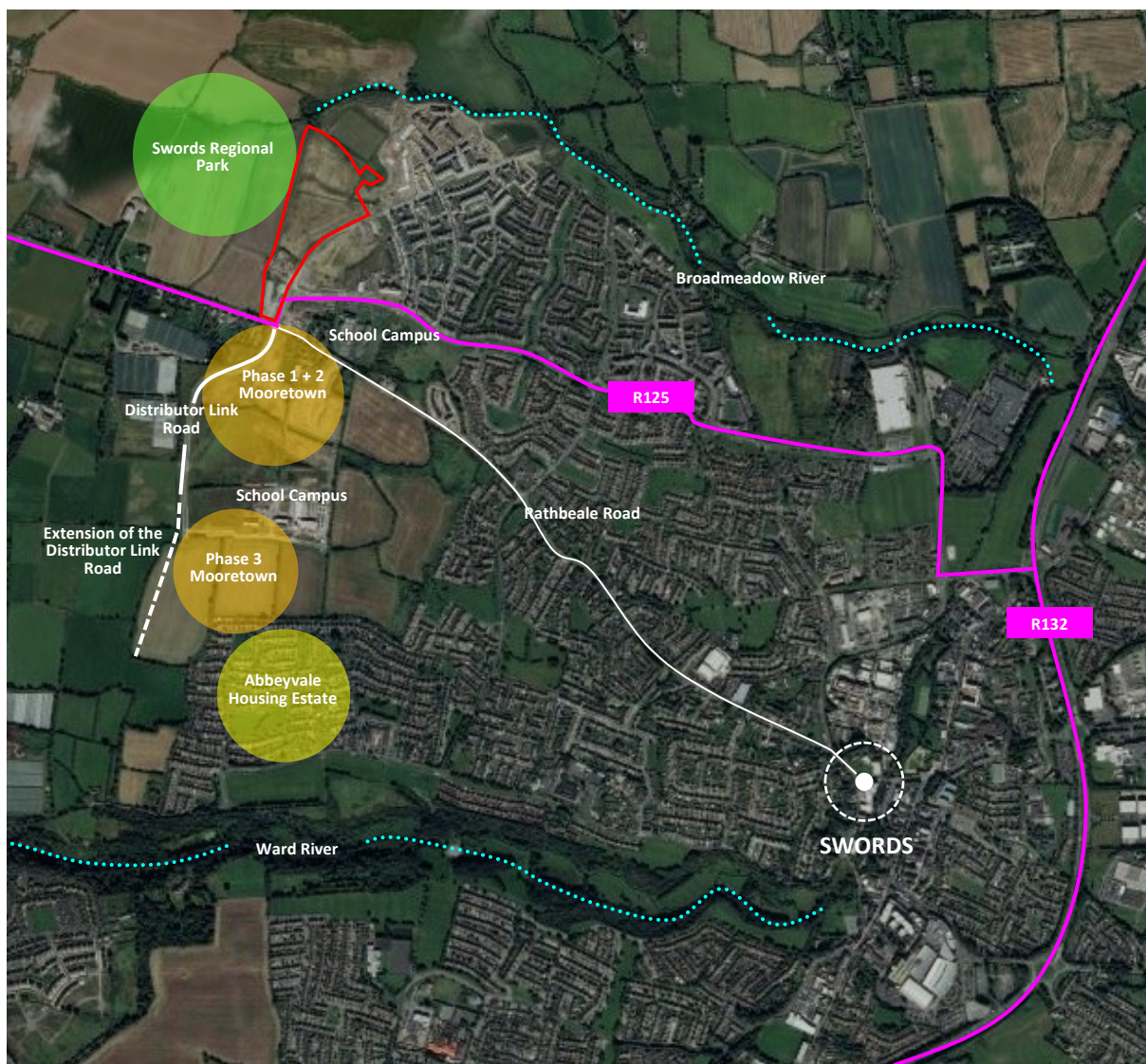


Figure 1. Aerial View of the Location of the Subject Site (approximate boundaries of the subject site outlined in red)

There are no existing permanent structures or other features on the site. There is a large red barn adjacent to the western boundary and there are newly completed houses on the northeast boundary

(Meadowbank Phase 4D Reg. Ref. F18A/0750). There are several temporary prefabricated structures on the site that housed Swords Educate Together and Scoil Bhrian Boroimhe primary schools before their permanent buildings were completed on Glen Ellan Road. The temporary structures are currently being used as temporary site office/site compound structures by the Contractor of the ongoing construction of the adjoining lands and will be removed from the site in order to facilitate the proposed development.



Figure 2. Aerial View of the Subject Site (approximate boundaries of the site outlined in red)

3.0 PLANNING HISTORY

Downey have carried out a comprehensive examination of the planning history pertaining to the subject site and its broader Oldtown-Mooretown lands, which determined that there have been several planning applications made on these lands. An overview of the most relevant planning history pertaining to the subject site and its wider context is provided below.

3.1 Planning Applications pertaining to the Subject Site

As summarised below, there are 3 no. planning applications made on the subject lands, all primarily focused on the southern sections of the site:

- **Reg. Ref. F08A/0146** - By order dated 9th May 2008, Fingal County Council granted permission to Gaelscoil Bhrian Boroimhe for construction of two single storey prefabricated extensions to existing schools. *The National school extension will consist of 2 no. classrooms and associated bathrooms, 4 no. resource rooms, storage, and library (total area c. 390sqm). The Gaelscoil*

extension includes 4 no. classrooms and associated bathrooms (total area 385sqm). Both extensions will be the same design and finishes as per existing and connected to site services.

- **Reg. Ref. F07A/1683** - By order dated 1st August 2008, Fingal County Council granted permission to Gerry Gannon for the erection of a single-storey prefabricated school. *The school will consist of 8 no. classrooms with associated WCs, 3 no. resource rooms, administration, staff room, storage/utility and multi-purpose room, inter-connected by a roof lit corridor (total are 970m.sq). The school will be accessed off an extended distributor road, footpath, and services from Applewood Village.*
- **Reg. Ref. F05A/1778** - By order dated 7th June 2006, Fingal County Council granted permission to Gerry Gannon on behalf of Swords Educate Together NS & Gaelscoil Bhrian Boroimhe for a temporary planning permission for a period of three years, for the erection of two single storey prefabricated schools. *This is part of the decanting phase for the permanent School & Community Campus. The National school will consist of 12 no. classrooms, 3 no resource rooms, admin/staff room, storage/plant, and multi-purpose room (total area c. 1535 sqm). The Gaelscoil includes 9 no. classrooms, 2 no. resource rooms, admin/staff room, storage/plant, and multi-purpose room (total area c. 1185 sqm) Both schools will be accessed off an extended distributor road, footpath, and services from Applewood Village/Oldtown.*

3.2 Planning Applications pertaining to the Oldtown and Mooretown lands

As summarised below, a number of applications have been made on the Oldtown-Mooretown lands which can be summarised into 4 development phases, as follows:

- **Phase 1 (F11A/0436)** - Parent Permission for 245 dwellings and a creche, amended by subsequent permissions and subsequently changed to 242 dwellings and an additional creche. This phase is largely complete and occupied.
- **Phase 2 (F11A/0473)** - Parent Permission for 224 dwellings, 1 no. creche, and the commercial centre. Amending permissions have been granted to alter the internal site layout and change the house type, and the overall total is currently 252 units. The anchor commercial block (mini-market, shops, café and 14 apartments) due for completion June/July 2020.
- **Phase 3 (F15A/0390)** - Parent Permission for 246 dwellings and a crèche. Amending permission has been granted to alter the internal site layout and change the house type, and the overall total is currently at 255 units. 147 residential units complete and occupied.
- **Phase 4A (F17A/0666)** - Parent Permission for 41 houses and 54 apartments. Houses complete and being occupied, apartments to commence in 2020/early 2021.
- **Phase 4B (F17A/0735)** - Parent Permission for 53 houses and 45 apartments. Houses largely complete and occupied, apartments to commence in 2020/early 2021.
- **Phase 4C (F17A/0687)** - Parent Permission for 92 houses. Amending permission has been granted to alter the internal site layout and change the house type, and the overall total is currently at 101 units. Under construction

4.0 PRE-APPLICATION CONSULTATION

4.1 Pre-application Consultation with Fingal County Council

4.1.1 Formal Section 247 Pre-planning Consultation

The formal Section 247 Pre-Application Consultation with the Planning Authority required under the Planning and Development (Housing) and Residential Tenancies Act 2016 took place on 12th December 2019 in the offices of Fingal County Council. The initial concept design for the application site which were presented at this meeting provided for c. 399 dwelling units provisioned in a mix of houses, apartments, and duplex units.

Those in attendance from Fingal County Council consisted of Chris Garde, Planning (Senior Executive Planner), Peter Byrne, Planning (Senior Planner), Claire McVeigh, Planning (Senior Executive Planner), Phillip Grobler, Planning & Strategic Infrastructure (Senior Executive Engineer), Linda Lally, Roads and Transportation (Senior Executive Engineer), Michael Costelloe, Roads and Transportation (Executive Engineer), Gemma Carr, Parks and Green Infrastructure (Executive Parks Superintendent), and Christine Baker, Community and Archaeology (Heritage Officer). The Design Team consisted of Pamela Gill (CCK Architects and Urban Designers), Lea Duran (CCK Architects and Urban Designers), Linda Doyle (Doyle O'Troithigh Landscape Architecture), Mark Duignan (Waterman Moylan), John Downey (Downey Planning), Eva Bridgeman (Downey Planning), and Client's Representative, Dave O'Sullivan.



Figure 3. Initial, Preferred Concept Design Presented in the Pre-application Consultation Meeting with the Local Authority

The proposal set out during this consultation consisted of a residential scheme comprised of 399 no. units on an approximately 8ha land providing for a density of circa 42.4 units per hectare. The site

layout plan submitted as part of this 247 Pre-Application Consultation with the Planning Authority is presented in the Figure 3 above.

This consultation resulted in the design team giving further due consideration to density, provision for Class 1 and Class 2 open space, LAP development phases, updates on phasing delivery of infrastructure works to the lands, etc. This ultimately helped to inform the design of the proposed development.

4.2 Part V Engagement

Part V of the Planning and Development Act, 2000 (as amended) applies to the proposed development. In order to reach an agreement regarding compliance with Section 96 of Part V of the Planning and Development Act, 2000 (as amended), the client engaged with the Housing Department of Fingal County Council. In accordance with the Council's requirements and upon sending a booklet of indicative costings to the Housing Department.

It is noted that in light of recent Part V amendments following Housing Act 2021 and Housing Circular 28/2021 on Affordable Housing Act 2021, the Part V provision now provides for 20% of the overall units proposed. These have been identified on the architectural drawings and detailed schedule of accommodation (Housing Quality Assessment) prepared by CCK Architects.

In accordance with the Council's requirements, indicative costings are enclosed as part of this planning application. A validation letter from Fingal County Council's Housing Department is also enclosed with this planning application. Thus, it is considered that the proposal meets the requirements of Part V of the Planning and Development Act, 2000 (as amended).

4.3 Pre-Application Consultation with An Bord Pleanála

4.3.1 Formal Section 5 Pre-application Consultation

Following consultation with Fingal County Council under Section 247 of Planning and Development Act, 2000 (as amended), a request to enter into pre-application consultation with An Bord Pleanála was submitted on 6th July 2020, with An Bord Pleanála subsequently accepting the Section 5 pre-application consultation request. The pre-application consultation meeting was then held virtually via Microsoft Teams on 30th November 2020. This meeting included representatives of the prospective applicant and their design team, the planning authority, and An Bord Pleanála in attendance.

On 16th December 2020, An Bord Pleanála issued the notice of pre-application consultation opinion for the proposed development, under case reference ABP-307498-20. Having regard to the above, the opinion states that *"An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development."*

The Board's opinion letter further notes 2 items to be further considered as part of any forthcoming application. These includes: (1) Design and Layout, and (2) Height and Density.

The opinion further states that *“pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission.”* These are as follow:

1. *A report identifying demand for school places likely to be generated by the proposal and the capacity of existing schools in the vicinity to cater for such demand.*
2. *Social Infrastructure Audit.*
3. *A detailed landscaping plan for the site which clearly sets out proposals for hard and soft landscaping including street furniture and play areas where proposed, and which includes detailed proposals for the area of zoned public open space, included within the red line boundary.*
4. *Additional CGIs, visualisations and cross sections, as necessary, which clearly show the relationship between the proposed development and existing development in the immediate and wider area.*
5. *Ecological Surveys*
6. *Archaeological Assessment*
7. *Waste management details*
8. *A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority. Streets should be shown up to the boundary to facilitate future access.*
9. *A housing quality assessment which provides specific information regarding the proposed apartments, and which demonstrates compliance with the various requirements of the 2018 Guidelines on Design Standards for New Apartments, including its specific planning policy requirements. This should also include a schedule of floor areas for all proposed units, clearly setting out the aspect (single, dual, triple) of each unit.*
10. *Additional transportation details having regard to the requirements of the Transportation Planning Division as contained within Appendix 2 of PA Opinion.*
11. *Additional drainage details having regard to the requirements of the Drainage Division as indicated in their report contained Appendix 2 of PA Opinion. Any surface water management proposals should be considered in tandem with any Flood Risk Assessment, which should in turn accord with the requirements of ‘The Planning System and Flood Risk Management’ (including associated ‘Technical Appendices’).*

For the detailed response to items raised in the opinion letter and to source the requested information within this SHD application documentation, please refer to the ‘Statement of Response to An Bord Pleanála’s Pre-Application Consultation Opinion’ prepared by Downey.

Further Pre-Application Consultation with Fingal County Council

At this juncture, it is also important to note that this application now being submitted for a proposed Strategic Housing Development is the result of a detailed design review of the proposed development

by the applicant and design team following receipt of the Board's Pre-Application Consultation Opinion. It is also the result of further off-line discussions between the relevant design team consultants and Fingal County Council's internal departments, including Roads and Transportation, and Parks and Green Infrastructure, prior to the formal lodgement of the application. Irish Water were also further consulted prior to lodgement.

5.0 DESCRIPTION & MERITS OF THE PROPOSED DEVELOPMENT

5.1 Description of Proposed Development

The proposed development, as per the description contained within the statutory planning notices, provides for:

"We, Gerard Gannon Properties, intend to apply to An Bord Pleanála for permission for a strategic housing development at lands to the north of Rathbeale Road and to the west of and north of Miller's Avenue and Glen Ellan Road, Oldtown, Swords, Co. Dublin, with associated engineering works on lands locally known as the Celestica/Motorola site, junction of Glen Ellan Road and Balheary Road, and at/on Balheary Road, Swords, Co. Dublin.

The development will consist of the removal of the temporary site office/site compound structures on site and the construction of a total of 377 no. residential units (173 no. houses, 134 no. apartments, and 70 no. duplex units [comprising 35 no. duplex 'house' units and 35 no. duplex 'apartment' units]), and 1 no. childcare facility, all of which will be provided as follows:

- *173 no. residential houses (9 no. 2 bed houses, 147 no. 3 bed houses, and 17 no. 4 bed houses) in semi-detached, end-terraced, and mid-terraced houses ranging from two to three storeys in height;*
- *Duplex Block A containing a total of 18 no. units comprising of 9 no. 1 bed units, 8 no. 2 bed units, and 1 no. 3 bed unit, in a building three storeys in height, and all units provided with private balconies/terraces; car parking and bicycle spaces, and bin stores;*
- *Duplex Block B containing a total of 8 no. units comprising of 4 no. 1 bed units and 4 no. 2 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; car parking and bicycle spaces, and bin stores;*
- *Duplex Block C containing a total of 8 no. units comprising of 4 no. 1 bed units and 4 no. 2 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; car parking and bicycle spaces, and bin stores;*
- *Duplex Block D containing a total of 20 no. units comprising of 10 no. 1 bed units, 9 no. 2 bed units, and 1 no. 3 bed unit, in a building three storeys in height, and all units provided with private balconies/terraces; car parking and bicycle spaces, and bin stores;*
- *Duplex Block E containing a total of 8 no. units comprising of 4 no. 1 bed units and 4 no. 2 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; car parking and bicycle spaces, and bin stores;*
- *Duplex Block F containing a total of 8 no. units comprising of 4 no. 1 bed units and 4 no. 2 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; car parking and bicycle spaces, and bin stores;*

- *Apartment Block A containing a total of 48 no. units comprising of 18 no. 1 bed units and 30 no. 2 bed units with all units provided with private balconies/terraces, in a building four to five storeys in height, with internal bicycle stores, bin stores and plant rooms at ground floor level; car parking within the parking court, the undercroft and on-street, and bicycle parking;*
- *Apartment Block B1 containing a total of 32 no. units comprising of 17 no. 1 bed units and 15 no. 2 bed units with all units provided with private balconies/terraces, in a building four to five storeys in height, with internal bicycle stores, bin stores and plant rooms at ground floor level; car parking within the parking court, the undercroft and on-street, and bicycle parking;*
- *Apartment Block B2 containing a total of 32 no. units comprising of 17 no. 1 bed units and 15 no. 2 bed units with all units provided with private balconies/terraces, in a building four to five storeys in height, with internal bicycle stores, bin stores and plant rooms at ground floor level; car parking within the parking court, the undercroft and on-street, and bicycle parking;*
- *Apartment Block C containing a total of 22 no. units comprising of 11 no. 1 bed units and 11 no. 2 bed units with all units provided with private balconies/terraces, in a building four to five storeys in height, with internal bicycle stores, bin stores and plant rooms at ground floor level; car parking within the parking court, the undercroft and on-street, and bicycle parking;*
- *1 no. childcare facility in a one to two storey building, with associated outdoor play area, car parking and drop-off/visitor parking, bicycle parking, and bin stores.*

The development will provide for a total of 600 no. car parking spaces within the scheme; a total of 440 no. bicycle spaces serving the apartments, duplexes and childcare facility; the completion of Meadowbank Road adjoining Park Avenue; new vehicular accesses onto Miller's Avenue; proposed upgrades to public realm including footpaths, landscaping including play equipment, boundary treatments, and public lighting; and all associated engineering and site works necessary to facilitate the development including the proposed stormwater storage tank and overflow outfall gravity sewer to the Broadmeadow River with associated manholes on lands locally known as the Celestica/Motorola site, junction of Glen Ellan Road and Balheary Road, and at/on Balheary Road, along with the proposed vehicular/service access onto Balheary Road, Swords.

The application contains a statement setting out how the proposal will be consistent with the objectives of the Fingal Development Plan 2017-2023.

The application contains a statement indicating why permission should be granted for the proposed development, having regard to a consideration specified in section 37(2)(b) of the Planning and Development Act, 2000, as amended, notwithstanding that the proposed development materially contravenes a relevant development plan or local area plan other than in relation to the zoning of the land.

An Environmental Impact Assessment Report (EIAR) and a Natura Impact Statement (NIS) have been prepared in respect of the proposed development."

The key characteristics of the proposed development are set out below for the convenience of the Board:

Table 1. Key Characteristics of the Proposed Development

Overall Site Area Subject to this SHD (incl. OS lands & the off-site upgrade works)	10.22 ha
Net Site Area	7.8 ha
No. of Residential Units	377
<i>Houses</i>	173
<i>Duplex Houses</i>	70
<i>Apartments</i>	134
HOUSES	
<i>2 Bedroom Units</i>	9
<i>3 Bedroom Units</i>	147
<i>4 Bedroom Units</i>	17
APARTMENTS/DUPLEX UNITS	
<i>1 Bedroom Units</i>	98
<i>2 Bedroom Units</i>	104
<i>3 Bedroom Units</i>	2
% of Dual Aspect Units	60%
Net Density	48.3 uph
Car Parking Spaces	600 no.
Bicycle Parking Spaces	440 no.
Residential Amenities	519 sqm (childcare facility)
Communal Open Space	1,795 sqm
Public Open Space	8,715 sqm on site & 13,722sqm on OS zoned lands

The following provides a detailed overview of the proposed scheme. It is noted that this part is taken from the Urban Design and Architecture Statement prepared by CCK Architects, which we invite the Board to refer to.

5.2 General Layout

The site plan is a permeable, legible, and connected network of streets and spaces radiating from the Miller's Avenue that runs diagonally through the Oldtown lands, providing for the scheme to appear as a gateway to Swords on the western approach. Short streets and small residential blocks frame views from Miller's Avenue of the park that wraps around the west and north boundaries. The southern section of the SHD development is a narrow tapering shape and has restricted access and movement onto Miller's Avenue and the Rathbeale Road. Higher density apartment blocks are proposed to contain and overlook these busy streets. To the rear of these blocks is a large managed communal open space for residents and a generous 'buffer' between their curtilage and the regional park in the west. The 'buffer' is designed as a public walkway which will link Rathbeale Road to the SHD development and the regional park. The walkway entrance on Rathbeale Road is marked by a large brick archway spanning from the development boundary to Block C.

The central section of the development steps back from Miller's Avenue. This is because of a wide trunk watermain that cuts into the site, and on which no structures can be built. The space between stepped-back building edge and Miller's Avenue is held or book-ended by a four storey plus penthouse apartment block to the south (Apartment Block B1) and by the three storey Type R houses and Duplex Type D in the north, after which the building line is at liberty to step back to the road edge. A generous and lush verge of hazel and juneberry is proposed to be planted along this section of slip road which will support biodiversity and will provide visual interest and character.¹

The northern section of the site has a more organic and informal street pattern which takes its cue from the line of the townland boundary. Unfortunately, the hedge and ditch marking this feature were removed to facilitate the under-grounding of an ESB cable some time ago, but a good length of it along the northern boundary is proposed to be re-planted. Its sharp zig-zag has been integrated into the street pattern, and will be developed as a small, shared surface space (Roads 1.1 and 2.1). Southern sections of the same townland boundary have been integrated into the street pattern and pocket park of the adjacent phase under construction (Phase 2, Westmill).

Internal streets are designed for regular and sustainable planting of street trees: generally one side of the street will have streetlights and the opposite pavement will be widened to 3.7m to accommodate services and a large structural tree pit. This allows for a continuous run of good-sized trees rather than a hit-and-miss approach of trees weaving around lamp posts.

Continuous and active edges provide enclosure and passive surveillance. All residential buildings 'turn the corner' with specially designed end units that present a public face to both sides, and blank garden walls are kept to a minimum, especially by the 'backless' wide-fronted houses that can have shorter rear gardens. There are a number of pocket parks within the development, and one is particularly big and central. This park opens up towards the regional park and will be a focal point for active play, especially amongst primary school children. All of the public open spaces are overlooked by residential buildings, and a mix of on and off-street car parking will create regular footfall between public paths and building entrances.

5.3 Building Height and Form

The height of the proposed development will range from 2 storeys to 5 storeys, with the variation in height being supported by the variation in housing types and the different character areas. This includes five-storey apartment blocks, three-storey duplex buildings designed in different typologies, and conventional own door housing on own curtilage.

This is essentially a mid-rise scheme appropriate to its setting on the outskirts of Swords. For the most part, principal streets, edges, and open spaces are defined by taller blocks of 3 to 5 storeys, with the highest buildings located to the Rathbeale crossroads and village centre, and on the northernmost point where a taller landmark is befitting.

As mentioned above, there is good variation in building height across the SHD site, and the pattern proposed in this development is compatible with the pattern established in the permitted and existing

¹ Irish Water does not permit trees to be planted on wayleaves.

development. The change in level falling from south to north will result in stepped terraces, adding another layer of interest and variety in the scheme's roofscape.

It is also submitted that the heights being proposed are consistent with national planning guidelines, particularly the *"Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)"*.

5.4 Communal and Public Open Space

Public open space is to be provided at a rate of 25 sqm per bedspace. As demonstrated in the Table below, with average of 1.5 no. bedspaces for 1- and 2-bed units and average of 3.5 no. bedspaces for 3- and 4-bed units, an overall total of 897.5 no. bedspaces is to be provided by the scheme.

Table 2. Details on Calculation of Number of Bedspaces within the Proposed Scheme

Units Type	No. of Units	Avg. No. of Bedspace	Overall No. of Bedspaces
1 + 2 Bed Units	211	× 1.5	316.5
3 + 4 Bed Units	166	× 3.5	581
Total			897.5

Source: CCK Architects

Multiplying the overall number of bedspaces within the scheme by the average rate of 25 sqm for public open space provision, as illustrated below, a total of 22,437.5 sqm public open space is required by the development.

$$897.5 \text{ no. bedspaces} \times 25 \text{ sqm public space provision} = 22,437.5 \text{ sqm}$$

Of the 22,437.5 sqm of public open space required, 8,715 sqm is to be provided within the proposed scheme. This is submitted to be 11% of the net development lands, calculated at 7.8 hectares. It is noted that the balance of 13,722.5 sqm is to be provided on OS zoned lands as part of the regional park. As illustrated in the Figure below, there is a range of public open spaces provided throughout the application site.

This includes Park 01, with an approximate area of 2,771 sqm, which is an open space contiguous with existing circular open space which is already under construction as part of the regional park works; Park 02, with an approximate area of 500 sqm, which is a triangular pocket park designed for passive and social residential amenity; Park 03, with an approximate area of 4,151 sqm, as a large centrally located open space with primarily active uses; and Park 04, with an approximate area of 1,293 sqm, which is a generous landscaped walking route linking Rathbeale Road into the development and the regional park. This open space is designed to be integrated within the regional park when it expands further west.



Figure 4. Class 2 Open Space Provision with the Proposed Scheme

It is noted that Playground provision is to be provided at a rate of 4 sqm per dwelling, which is 1,508 sqm in total. Doyle O'Troithigh Landscape Architects have developed a proposal to provide 653 sqm within the Class 2 open space, 562 sqm in the regional park (as part of a larger, "destination" playground cluster with MUGA), and the remaining 293 sqm to be provided as natural play within the western linear park (also part of the regional park).

As mentioned, the outstanding balance of 13,722.5 sqm public open space would be provisioned within the regional park. This is designed in three open spaces, comprising of: Open Space 01, with an approximate area of 870 sqm, which is adjacent to the proposed development and contiguous with the regional park. Noted that these lands are zoned "OS - Open Space" under current Development Plan; Open Space 02, with an approximate area of 9,956 sqm, which is a plot of "OS - Open Space" land within the regional park that has not been attributed to an earlier planning permission; and Open Space 03, with an approximate area of 2,896.5 sqm, which similarly is a plot of "OS - Open Space" land within the regional park that has not been attributed to an earlier planning permission.

Communal open space for duplex units and apartments is provided in accordance with the 2020 guidance document Design Standards for New Apartments. These shared spaces generally are to the rear of blocks where they are protected and overlooked by the residents they serve. These spaces will be privately managed and are not proposed to be taken-in-charge by the Local Authority. The Table 3 below describes the area required and proposed; many blocks share a common space, and these have been grouped together in the Table below.

Table 3. Schedule of Communal Open Space

Open Space	Block/Location	Area Required (sqm)	Area Provided (sqm)
Communal OS1	Apartment Block A + Duplex A	410	427
Communal OS2	Duplex B	48	64
Communal OS3	Duplex C	48	87
Communal OS4	Duplex D	122	252
Communal OS5	Duplex E	48	96
Communal OS6	Duplex F	48	75
Communal OS7	Apartment Block B1, B2, C	512	792
Total		1,236	1,793

Source: CCK Architects

The proposed amenity spaces also benefit from passive surveillance from the proposed residential units and are carefully screened to permit visual transparency between the buildings while maintaining security for residents. Where deemed appropriate corner residential units with gable windows have been located at prominent points to address public areas and further enhance passive surveillance. Landscape design will play an important role in marrying the external amenity spaces together and creating visual continuity between the scheme and its wider context.

5.5 Private Open Space

Private open space has been provided for each residential unit in the form of adequately sized private open space in the form of gardens, balconies, or patios/terraces (designed in accordance with quantitative and qualitative standards), with the units at ground floor level provided with appropriate boundary treatments to ensure privacy and security whilst also providing visual interest and distinction between spaces. Appropriate separation distances have been provided between buildings to ensure privacy without compromising internal residential amenity of the apartments.

This meets and/or exceeds the requirements of the Fingal Development Plan as shown on the compliance schedule/residential quality audit attached, i.e. a minimum of 60 sqm for a 2-3 bedroom house and a minimum of 75 sqm for a >4 bedroom house. Noted that provision for private open spaces for the apartments is also in full compliance with the requirements of both Fingal Development Plan and Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020.

5.6 Density

As outlined earlier, the site subject to this SHD application extends to 10.22 hectares, however, the quantum of developable land to provision for housing and directly associated uses is down to 7.8 hectares.

The initial concept, subject to this SHD application, comprised 339 dwellings on the net development site area of approximately 8 hectares, providing for a net density of c. 42.4 units per hectare. However, as it is acknowledged that the view expressed in An Bord Pleanála Pre-Application Consultation

Opinion on this SHD, “particular regard should be had to need to develop at a sufficiently high density to provide for an acceptable efficiency in serviceable land usage given the location of the site and its proximity to the Key Town of Swords and with its established social and community services.”

Therefore, the Opinion of ABP has been considered and the scheme has been revised to now provide for 377 dwellings (173 houses, 70 duplex units, 134 apartments and a creche) on a site of 7.8 hectares and a net density of 48.3 units per hectare would be achieved.

This is consistent with the Development Plan and Section 28 Guidelines and has been calculated as per the provided guidance on the Appendix A of the “Sustainable Residential Development in Urban Areas and Best Practice Urban Design Guidelines (2009)”.

- Overall Site Area Subject to this SHD Application: 10.22 ha
- Net Site Area: 7.8 ha
- Net Density: 377 units ÷ 7.8 ha = 48.3 uph

With respect to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (May 2009), which recommends a net density of 35-50 dwellings per hectare on “Outer Suburban/Greenfield” sites, the proposed development fall comfortably in the higher end of the suggested range. Thus, the residential density of the proposed development is in keeping with the decision of an Bord Pleanála and is consistent with the DEHLG Guidelines on “Sustainable Residential Development in Urban Areas and Best Practice Urban Design Guidelines (2009)” and accompanying Design Manual.

In light of the objectives and constraints associated with the development site, it is considered that the density proposed represents an optimum design solution and an efficient use of the site.

5.7 Unit Mix

The proposed scheme provisions for an overall of 377 no. residential units, offering a variety of unit mix in terms of size and type, as summarised in the Table 4 below.

Table 4. Proposed Residential Mix Statistics

Dwelling Type	Bedroom Provision	No. of Units
Apartments & Duplex Units	1 Bed	98
	2 Bed	104
	3 Bed	2
Houses	2 Bed	9
	3 Bed	147
	4 Bed	17
Total no. of Units		377

This will provide significant diversity of dwelling types to meet the Development Management Standards of the Fingal Development Plan on the dwelling mix. The proposal also allows for a wide choice of dwelling types meeting the needs of people of all age groups and stages of personal and

family life. The mix of unit types is provided in the development in a series of character areas and urban blocks ensuring choice in both unit type and location while maintain a sense of enclosure and belonging by providing clear identifiable residential zones.

Further to provision for a variety of unit types with multiple bed spaces, there is also a significant amount of diversity in terms of size, layout, storage, aspect, room dimensions, etc. within the proposed scheme. This is to ensure that the proposed development provides for various needs of its future residents catering for all age group demographics, also adaptable and flexible for their changing needs, be it, single professionals, young couples, small young families, older families, the elderly, those looking to downsize, etc.

For further details on the design, unit mix, and a detailed breakdown of the proposed dwellings within the development, please refer to the enclosed drawings and Housing Quality Assessment (HQA) prepared by CCK Architects.

5.8 Car & Bicycle Parking

The proposed development provides for a total of 600 no. car parking spaces. Of these, 537 spaces are to be designated for residents, 2 for Go-Car, 52 for visitors and 3 for staff creche, 6 for creche drop-off and collection. The proposed creche has 3 staff spaces and 6 drop-off on-street spaces.

The Development Plan requires that each dwelling to be provided with 2 no. car parking spaces which is being provided within this scheme. The car parking for apartments and duplex units, however, is provided at a reduced ratio per unit. Thus, the overall car parking provision may be considered to potentially materially contravenes the Fingal Development Plan 2017-2023.

However, adherence of the proposed scheme to the national and regional policy guidance in terms of car parking provision reflects the prime location of the development in relation to its connectivity and access to R125 (Rathbeale Road) and public transport services. The Oldtown lands are situated in an accessible location within 3km distance from Swords town centre, which are served by Dublin Bus and Swords Express services.

The lands are also accessed via the Glen Ellan Road and Miller's Avenue, a partly completed link road. Moreover, there is access to the site through Miller's Glen development, to which the proposed scheme is an extension. The excellent connectivity of the subject site, in line with the national and regional policy guidance, would allow for a reduced quantum of car parking space which consequently promote green modes of transport as well.

The proposed development also provides for an overall total of 440 no. bicycle parking spaces in high quality, safe and accessible locations throughout the scheme. These parking spaces are to be provided in accordance with Section 4.15 of the 2020 guidelines Design Standards for Apartments. Houses are proposed to secure and store their bicycles on their own private property, and all duplex and apartment buildings will have a secure, accessible, and sheltered purpose-built store. These are integrated into ground floors of the larger apartment blocks and are provided as individual external storage buildings for duplex units.

Please refer to the enclosed Statement of Material Contravention prepared by Downey, Traffic and Transport report prepared by Waterman Moylan Consulting Engineers, and the Urban Design and Architectural Statement prepared by CCK Architects for further details in this regard.

5.9 Residential Amenities

The proposed development will also provide for a purpose-built childcare facility extending to circa 519 sqm to accommodate for approximately 102 children within the site with appropriate outdoor play space, drop off facilities, etc.

A Childcare Provision Assessment Report has been prepared by Downey and submitted with this SHD application which demonstrates that there is sufficient capacity within area to cater for the proposed development and that the proposed childcare facility will sufficiently provide an appropriate level of childcare facilities to serve the future residents of the scheme.

Please refer to the enclosed Childcare Provision Assessment Report, School Demand Assessment Report, Community Infrastructure and Social Audit, and the Statement of Consistency with Planning Policy report prepared by Downey Planning for further information in this regard.

5.10 Materials & Finish

The material palette of brick and painted render have been chosen for their durability, low maintenance requirements and long-life span. Each character area is to have its own selected bricks to establish its distinct quality within the development

The extent of brick and render is shown on the drawings of individual building types and on composite elevations. In general terms, the houses and duplex buildings have a mixture of brick and render finishes, while apartment blocks have a greater extent of brick, with elevations to the public realm often almost entirely in brick.

The secondary material palette within the development will complement the primary elements. At the houses and duplex units, pitched roofs will be in dark slate or clay/concrete tiles. All front doors will be coloured composite or painted timber doors with glazed fanlights and/or sidelights. Front door canopies will have a metal finish to match individual features of dormer windows in standing seam zinc cladding. At the apartment buildings recessed penthouse apartments will be clad in standing seam zinc cladding of light grey. Duplex units have steel bar guarding while glazed balustrades are proposed on the apartment blocks.

Please refer to the plans, sections, and elevation drawings, and Urban Design and Architectural Statement prepared by CCK Architects for further details on the designs, materials, and finishes. Please also refer to the photomontages and CGI's prepared by Model Works.

6.0 LOCAL PLANNING POLICY CONTEXT

This section of the report provides an account of the relevant local planning policy framework pertaining to the application site and proposed development, all of which is contained within the Fingal County Development Plan 2017-2023.

6.1 Fingal Development Plan 2017-2023

6.1.1 Overarching Considerations

The subject site is located within the functional area of Fingal County Council. The development of the site is therefore informed by the policies and objectives of the Fingal County Council Development Plan. The policies and objectives of the Development Plan are underpinned by the following vision:

“Within the next 25 to 30 years, Dublin will have an established international reputation as one of Europe’s most sustainable, dynamic and resourceful city regions. Dublin, through the shared vision of its citizens and civic leaders, will be a beautiful, compact city, with a distinct character, a vibrant culture and a diverse, smart, green, innovation-based economy. It will be a socially inclusive city of urban neighbourhoods, all connected by an exemplary public transport, cycling and walking system and interwoven with a quality bio-diverse green space network. In short, the vision is for a capital city where people will seek to live, work, experience, invest and socialise, as a matter of choice”.

6.1.2 Core Strategy & Housing Strategy

Fingal Development Plan 2017-2023

The purpose of the Core Strategy is to articulate a medium-to-longer term quantitatively based strategy for the spatial development of the area of the Planning Authority and in doing so, to demonstrate that a Development Plan and its policies and objectives are entirely consistent with national and regional policies and strategies.

Swords has been identified as a Metropolitan Consolidation Town in the Fingal Development Plan. The County Plan notes that the town benefits from its close proximity to Dublin Airport and has a strong industrial base which underpins its role as an important centre for employment in the County.

The vision of the Fingal Development Plan is to grow the county in a long-term sustainable way as it enters a period of economic and population growth. The plan states that, *“the emphasis of this Plan is to continue to consolidate the existing zoned lands and to maximise the efficient use of existing and proposed infrastructure. In this way the Council can ensure an integrated land use and transport strategy in line with national and regional policy. [...] The development of larger areas of residential or mixed-use lands will only take place subject to the necessary infrastructure being available and to this end will be subject to a Local Area Plan. It is through the LAP process that, within the towns and villages, the detailed phasing and distribution of housing will be determined in line with the population and housing targets established at a strategic level.”*

In this instance, the subject site forms part of the Oldtown and Mooretown lands in Swords which were previously subject to the Oldtown-Mooretown LAP 2010-2016 (extended to July 2020 and since expired). However, this final phase of the Oldtown lands has been designed and proposed within the spirit of the Plan. The proposed development also forms part of a wider residential scheme for the Oldtown lands granted under Reg. Ref. F11A/0436, Reg. Ref. F11A/0473, Reg. Ref. F15A/0390, Reg. Ref. F17A/0666, Reg. Ref. F17A/0735 and Reg. Ref. F17A/0687, in various phases. The proposed scheme comprises the final phase (Phase 5) of the overall development for the Oldtown lands. The expired LAP estimates that Oldtown-Mooretown LAP lands has the potential to accommodate 3,400

units, at a net density of 35-50 dwellings per hectare, resulting in a population of c. 10,000 on these lands.

Applications made to date on the Oldtown-Mooretown lands provide for a combined total of 967 dwellings, 5 crèches, and 1,537 sqm of retail uses have been granted planning permission. Of these, 647 dwellings are complete, and 207 dwellings are under construction. This is submitted to be within the envisaged housing target on the lands in the expired LAP and the Core Strategy for Swords in the current Development Plan.

Moreover, considering that the quantum of developable lands on the application site stands at 7.8 hectares, the scheme would provide for a net density of c. 48 units per hectare, which is also submitted to be within the spirit of the expired Local Area Plan, and in line with the current Development Plan and national policy guidance.

Table 5. An Overview of the Earlier Phases of Oldtown-Mooretown Lands (source: CCK Architects)

Reg. Ref.	Description	Status
F11A/0436 “Miller’s Glen”	“Phase 1” Parent Permission: 245 units, amended by subsequent permissions to 243 units	243 units complete
F11A/0473 “Westmill”	“Phase 2” Parent Permission: 224 units and the village centre, amended by subsequent permissions to 249 units	Civic Square, 1,372 sqm commercial uses, 48 dwellings and creche complete 108 dwellings under construction
F13A/0185 “Longview”	“Phase 3” Parent Permission: 246 units, amended by both planning conditions and subsequent permissions to 181 units.	161 units complete
F17A/0735 “Meadowbank”	“Phase 4A” Parent Permission: 96 units amended by condition to 95 units	41 units complete 54 units under construction
F17A/0735 “Meadowbank”	“Phase 4B” Parent Permission: 98 units granted	53 units complete 54 units under construction
F17A/0687 “Meadowbank”	“Phase 4C” Parent Permission: 92 units amended by subsequent permission to 101 units	101 units complete

With regards to the housing strategy as set out within the Development Plan, there are three core principles which inform and guide the core strategy which are as follows:

- “To ensure Fingal County Council provides for the development of sufficient housing to meet its obligations as set out in the Regional Planning Guidelines.

- *To identify the existing and likely future need for housing in the area of the Development Plan.*
- *To ensure that sufficient zoned lands are provided to meet the needs of the different categories of households.”*

It is submitted that the proposed development at Oldtown is consistent with the housing strategy as it will assist in the delivery of housing, of a sustainable density, within a wider residential scheme granted under Reg. Ref. F11A/0436, Reg. Ref. F11A/0473, Reg. Ref. F15A/0390, Reg. Ref. F17A/0666, Reg. Ref. F17A/0735 and Reg. Ref. F17A/0687, immediately adjoining a public transport corridor, whilst providing a variety of unit types and mixed tenures for all, in a high-quality, vibrant community setting.

Fingal Development Plan 2017-2023 Variation no. 2

This Variation No. 2 (adopted) to the Fingal Development Plan 2017-2023 seeks to respond to the changes in National and Regional planning policy, namely the publication of the National Planning Framework (NPF) in 2018 and the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES) in 2019. The NPF includes a National Strategic Outcome (NSO) to achieve compact growth and consolidation of Ireland’s cities as a top priority.

Outlined in the adopted variation, Swords is listed as a ‘Key Town’ in the Metropolitan Area with a development strategy of consolidation, active land management, employment generation and residential transport in the form of Metrolink and Bus-connects. Under the adopted variation, Swords has a remaining capacity of 14,799 residential units from the overall 34,806 units envisaged for the county. The document goes on to state that having regard to the status of the Key Town designation and the ongoing delivery of housing within Swords, a 15% increase in population is appropriate.

Furthermore, the key tenet of the overall Settlement Strategy is the continued promotion of sustainable development through positively encouraging consolidation and densification of the existing urban built form - and thereby maximising efficiencies from already established physical and social infrastructure.

Set out under **Objective SS02** of the Fingal Development Plan, Fingal County Council seeks to:

“Ensure that all proposals for residential development accord with the County’s Settlement Strategy and are consistent with Fingal’s identified hierarchy of settlement centres.”

The variation notes that, *“The key towns function as part of the Dublin Metropolitan Area and will continue to perform the role of the County’s primary development centres during the Plan period.”* As a Key Town, Swords has been identified as the administrative capital of the County and a key location for housing, enterprise and retail development, which will continue to perform the role of a primary development centre for the County during the Plan period.

Town/Village	Remaining Capacity (hectares)	Remaining Residential Units	Metropolitan Core % Land	Metropolitan Core % Units
Metropolitan Area				
Key Town				
Swords	481	14,799		
Dublin City and Suburbs				
Blanchardstown	260	9,306		
Howth	14	436		
Baldoye/Sutton	29	1498		
Other Settlements*	66.5	2,320		
Other Metropolitan Areas				
Portmarnock	43	1,116		
Self Sustaining Growth Towns				
Donabate	101	3,532		
Self Sustaining Town				
Malahide	75.5	956		
Towns/Villages	92	844		
Total Metropolitan				
	1,162	34,806	76%	81%

Figure 5. Residential Capacity under Fingal Development Plan 2017-2023, updated as of September 2019

Set out under **Objective SS02** of the Fingal Development Plan, Fingal County Council seeks to:

“Ensure that all proposals for residential development accord with the County’s Settlement Strategy and are consistent with Fingal’s identified hierarchy of settlement centres.”

The variation notes that, *“The key towns function as part of the Dublin Metropolitan Area and will continue to perform the role of the County’s primary development centres during the Plan period.”* As a Key Town, Swords has been identified as the administrative capital of the County and a key location for housing, enterprise and retail development, which will continue to perform the role of a primary development centre for the County during the Plan period.

Objective SS12 of the Fingal Development Plan, Fingal County Council seeks to:

“Promote the Key Town of Swords and the Metropolitan Area of Blanchardstown, respectively, as Fingal’s primary growth centres for residential development in line with the County’s Settlement Hierarchy.”

Also, **Objective SS14** of the Fingal Development Plan, Fingal County Council seeks to:

“Promote the continued sustainable development of Swords and Blanchardstown as core economic areas for enterprise in partnership with relevant State agencies.”

As stated in the adopted variation, *“Swords is a large economically active county town that provides employment for the surrounding areas and with existing and proposed high-quality transport links and the capacity to act as a growth driver to complement the Regional Growth Centres. In order to fulfil this role and in light of the emerging role that settlements such as Swords will be required to play in maintaining the success of the Metropolitan Area, a long term, adequately planned vision is necessary. In this regard, the long-term strategic vision for Swords is to create a sustainable city with a commensurate level of jobs, services and infrastructure to support a potential population of 100,000. In endeavouring to achieve this vision of an emerging green city with a thriving economy it is critical that adequate lands are zoned in the future to accommodate the full range of needs of the city’s residential population, business community and visitors. Within the current development envelope of Swords, even allowing for the introduction of possible new intensive mixed use zonings along the Metro line, Swords would have the capacity only to reach a population of circa 65-70,000.”*

It is submitted that the proposed development of 377 units complies with the objectives of the proposed variation to promote sustainable development through completion of the development of the Oldtown-Mooretown LAP lands. The proposed scheme also seeks to ensure the objectives for the LAP lands and Swords as a Key Town are achieved and do not exceed the remaining capacity of 14,799 units as set out in the Adopted Variation No. 2 to Fingal County Development Plan 2017-2023.

6.1.3 Sustainable Neighbourhoods and Communities

In terms of sustainable communities and urban design in residential developments, the Development Plan states that, *“successful areas are places where people want to live, work and visit”*. The Development Plan emphasises several characteristics that attractive places have in common:

- *“Include a range of facilities focused in a consolidated area with a critical mass of attractions and make best use of the already established investment in the built environment; these attractions include a mix of shops as well as a wide range of financial, professional and government services together with cultural, entertainment and leisure facilities.*
- *Include a thriving local residential population which adds to the vitality and vibrancy of the area as it ensures activity outside of standard retail and office opening hours.*
- *Are easily accessible by a range of transport modes including cycling and walking, have sufficient good quality short stay car parking close to the core area, have good transport linkages within the centre, and have efficient arrangements for delivery of goods.*
- *Present an attractive amenity in terms of the built environment and streetscape, streets and public spaces which are considered clean and safe, and have a sense of local identity and character, all of which greatly enhances the attraction of the centre.*
- *Have the vision and mechanisms in place to build on these existing assets, can overcome problems, adapt to both market and consumer needs and can secure appropriate and necessary improvements where required.*
- *Encourage and facilitate sustainable lifestyles and livelihoods.”*

It is submitted that the proposed development at Oldtown is consistent with these criteria. The proposed residential development which incorporates 1 no. childcare facility that is located in an area

which benefits from ease of access to a range of transport modes (including bus) with cycling and walking also taken as a key consideration of the proposed scheme. The influx of population arising from the proposed development will increase the critical mass required to further support public transport infrastructure.

There is a range of facilities in the immediate vicinity of the subject lands including community facilities, sports clubs, etc. and within the wider Swords area. A Community and Social Infrastructure Audit, prepared by Downey, also accompanies this SHD application which provides detailed information and assessment of the existing services currently supply the Oldtown lands. The design of the proposed development provides for an attractive development with a sense of character and place that will integrate the proposed development with the surrounding area and assist in the completion of the wider residential scheme for the lands.

6.1.4 Movement and Transport

In relation to movement and infrastructure, the Development Plan states that a safe, efficient, effective and sustainable transportation system is essential to the future economic, social and physical development of Fingal. The Development Plan seeks to:

- *“Promote and facilitate movement to, from, and within the County of Fingal, by integrating land use with a high quality, sustainable transport system that prioritises walking, cycling and public transport.*
- *Provide an appropriate level of safe road infrastructure and traffic management, in particular to support commercial and industrial activity and new development.*
- *Work with all relevant stakeholders to seek a reduction in greenhouse gas emissions from transport.”*

Some of the policies and objectives in this regard include:

Objective MT01 – *“Support National and Regional transport policies as they apply to Fingal. In particular, the Council supports the Government’s commitment to the proposed new Metro North and DART expansion included in Building on Recovery: Infrastructure and Capital Investment 2016-2021. The Council also supports the implementation of sustainable transport solutions.”*

Objective MT02 – *“Support the recommendations of the National Transport Authority’s Transport Strategy for the Greater Dublin Area 2016-2035 to facilitate the future sustainable growth of Fingal.”*

Objective MT03 – *“Implement Smarter Travel – A Sustainable Travel Future policy and work to achieve the Key Goals set out in this policy.”*

Objective MT04 – *“At locations where higher density development is being provided, encourage the development of car-free neighbourhoods, where non-motorised transport is allowed and motorised vehicles have access only for deliveries but must park outside the neighbourhood, creating a much better quality public realm with green infrastructure, public health, economic and community benefits.”*

It is submitted that the proposed development at Oldtown is consistent with the foregoing policies and objectives. This additional development in Oldtown will ensure walking and cycling are viable options for the community, with the area also served by existing public transport infrastructure (Dublin Bus Stop located within close proximity to the application site), all of which will ensure that the future population utilise sustainable public transport and active travel options rather than car transport.

The Plan notes that the integration of land-use and transport involves locating trip intensive land uses (such as high-density housing, offices, and comparison retail) near high capacity public transport (such as DART, Metro, Luas, and Bus Rapid Transit). It benefits the land uses by providing high quality public transport for the greatest number of residents and employees. It benefits public transport by providing sufficient customers within its catchment to sustain the high cost of public transport infrastructure and services. Allowing higher density development to occur along public transport corridors increases the number of people within the walking catchment of the public transport service, which in turn increases the patronage of the service, and leads to an increase in its financial and economic viability and positive environmental impact. In this instance, the proposed development provides for a residential development of sustainable density immediately adjoining high-frequency public transport in accordance with objectives set out within the Development Plan including:

Objective MT05: *“Integrate land use with transportation by allowing higher density development along higher capacity public transport corridors.”*

Objective MT08: *“Control on-street parking in the interests of the viability, vitality and amenity of commercial centres by maximising the supply of short stay parking for shoppers, while providing appropriate levels of long-term parking within a reasonable distance for employees.”*

Objective MT13: *“Promote walking and cycling as efficient, healthy, and environmentally friendly modes of transport by securing the development of a network of direct, comfortable, convenient and safe cycle routes and footpaths, particularly in urban areas.”*

Objective MT19: *“Design roads and promote the design of roads, including cycle infrastructure, in line with the Principals of Sustainable Safety in a manner consistent with the National Cycle Manual and the Design Manual for Urban Roads and Streets.”*

Objective MT22: *“Improve pedestrian and cycle connectivity to stations and other public transport interchanges.”*

Objective MT37: *“Implement traffic calming on particular roads and in appropriate areas of the County, especially residential areas, to reduce vehicle speeds in the interests of road safety and residential amenity. Ensure that where appropriate, traffic calming is included as a pre-condition as part of the development of all new estates or extensions to existing estates.”*

It is submitted that the proposed development at Oldtown is consistent with these policies and objectives. The completion of this area of the Oldtown-Mooretown lands and wider area will ensure

walking and cycling are viable options for the community, with the area also very well served by existing public transport infrastructure all of which will ensure that the future population utilise sustainable public transport and active travel options rather than car transport. This is outlined further in the enclosed Traffic and Transport Assessment prepared by Waterman Moylan Engineering Consultants.

6.1.5 Land Use Zoning

Under the Fingal Development Plan 2017-2023, the subject site is zoned “RA - Residential Area” and therefore aims to:

“Provide for new residential communities subject to the provision of the necessary social and physical infrastructure.”

The vision for this objective seeks to:

“Ensure the provision of high quality new residential environments with good layout and design, with adequate public transport and cycle links and within walking distance of community facilities. Provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.”

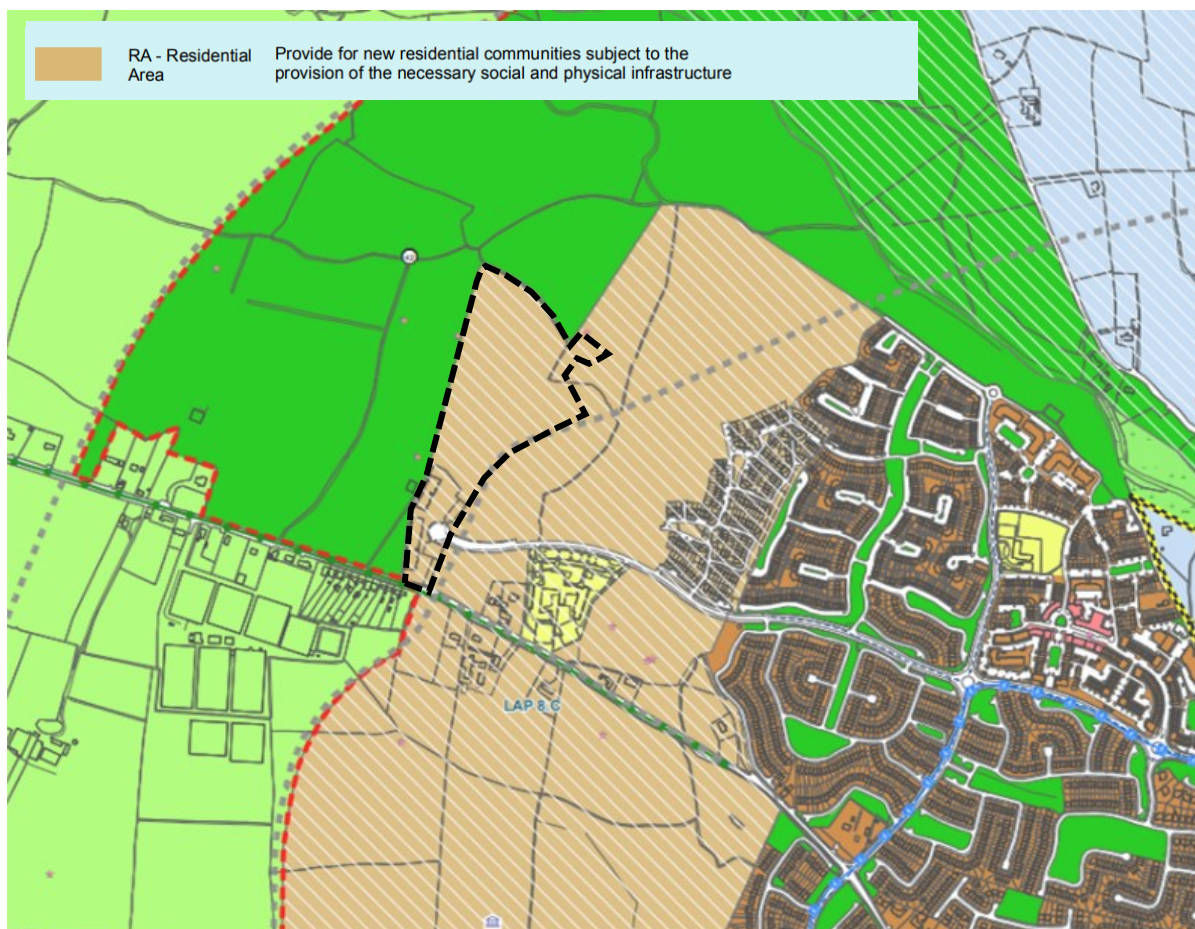


Figure 6. Land Use Zoning Map Extracted from the County Development Plan (application site outlined in black)

Under the RA zoning, the following uses are permitted in principle.

Uses Permitted in Principle under the RA Land Use Zoning

Amusement Arcade⁹; Bed and Breakfast; Betting Office⁹; Childcare Facilities; Community Facility; Education; Funeral Home/Mortuary⁹; Guest House; Health Centre; Health Practitioner; Hospital; Office Ancillary to Permitted Use; Office ≤ 100sqm⁹; Office>100sq.m. and, 1,000sqm¹¹; Open Space; Place of Worship; Public House⁹; Public Transport Station; Recreational Facility/Sports Club; Residential; Residential Care Home/Retirement Home; Restaurant/Cafe⁹; Retail-Local < 150 sqm nfa; Retail – Convenience ≤ 500 sqm nfa⁹; Retail – Comparison ≤ 500 sqm nfa⁹; Retail – Supermarket ≤ 2,500 sqm nfa⁹; Retirement Village; Sheltered Accommodation; Sustainable Energy Installation; Taxi Office; Traveller Community Accommodation; Utility Installations; Veterinary Clinic.

⁹ In a local centre only

¹¹ Only located in a local centre and of a scale appropriate to that centre

Table 6. Permitted Uses under the RA Land Use Zoning

Therefore, the proposed development of residential units and 1 no. childcare facility are permitted in principle under the zoning objectives pertaining to the subject lands. The Class 1 open space lands to the north are zoned OS-Open Space – “to preserve and provide for open space and recreational amenities”. The proposed open space in this area is therefore permitted in principle under this zoning designation. The proposed storage tank site is zoned ME-Metro Economic Corridor – “to facilitate opportunities for high-density mixed-use employment generating activity and commercial development and support the provision of an appropriate quantum of residential development within the Metro Economic Corridor”. The tank can be considered essential infrastructure and has been designed in conjunction with Irish Water. It will not only facilitate the connection requirement of this subject application but will also have the capacity to allow for continued development in the Oldtown/Mooretown catchment.

6.1.6 Development Standards

Chapter 12 of the Fingal County Development Plan sets out development standards and criteria that from the policies and objectives of the Development Plan to ensure that development occurs in an orderly and efficient manner and that it is in accordance with proper planning and sustainable development. The following section assesses the main set of standards and criteria required for high-quality, sustainable development:

Table 7. Compliance with Chapter 12 - Development Management Standards

Criteria	Compliance
12.1 Background	
Pre-Planning	On 12/12/2019, the applicant and the design team engaged in a Section 247 pre-application consultation meeting with representatives of Fingal County Council regarding the proposed Strategic Housing Development on lands at Oldtown, Swords, County Dublin. On 30/11/2020, Downey and the applicant engaged in a Section 5 pre-application consultation meeting with representatives of An Bord Pleanála and Fingal County Council regarding the proposed development as part of a Stage 2 consultation meeting. On 16/12/2020, An Bord Pleanála issued the notice of pre-application consultation opinion for the proposed development, under case reference ABP-307498-20. For the detailed response to this opinion and to source the requested information within the application documentation, please refer to

	the “Statement of Response to An Bord Pleanála’s Pre-Application Consultation Opinion” prepared by Downey.
12.2 Common Principles for all Planning Applications	
Access for All	<p>It is noted that the design of the proposed development has taken cognisance of people with reduced mobility through the provision of universally accessible dwelling units as well as readily adaptable dwellings. It is submitted that inclusivity and access have fully influenced the design of the scheme, as follows:</p> <ul style="list-style-type: none"> - The development will be fully Part M compliant with easy access. Physical and visual barriers have been avoided and full passive surveillance has been designed into overlook all public realm areas. Street layouts, footpath arrangements, street and verge planting combine to allow pedestrians and cyclists easily navigate the scheme through the different character areas proposed and connecting into the adjacent Oldtown schemes currently constructed and occupied. - The provision of 1 to 4-bed units in a proportioned mix will include a wide diversity of households in line with the earlier phases of development at Oldtown-Mooretown lands, which would bring an inclusive community at Swords. - An adequate compliance with Part V, delivering 20% of affordable and social apartments and houses. Please refer to architectural drawings for further detail on the Part V plan. - The proposed development is also submitted to be designed in accordance with the recommendations of ‘Buildings for Everyone’ 2002 published by the National Disability Authority and Technical Guidance Document M Access and Use of the Building Regulations 2010. <p>For further details in this regard, please refer to Universal Access Statement prepared by CCK Architects and submitted as part of this application.</p>
Green Infrastructure	<p>The proposed development provides for an overall of c. 0.8ha public open space, comprising of Class 2 public open spaces, as specified within the Fingal Development Plan. With respect to the developable site area of 7.8ha, this would provide for 11% public open space provision which exceeds the threshold envisaged in the Development Plan. Class 1 open space is also being provided to the north of the proposed scheme. It is noted that the earlier phases of the developing Oldtown-Mooretown provide for an overall of approximately 22.4ha Class 1 public open space, including 2 regional parks. The proposed scheme would also benefit from green infrastructure conceived for earlier phases of development at Oldtown-Mooretown lands, with intuitive and clear connections to the future Swords Regional Park. For further information in this regard, please refer to the detailed landscaping proposals prepared by Doyle O’Troithigh Landscape Architecture.</p>
Sustainable Design	<p>Efficiency through design has been achieved in the macro scale in terms of layout and site configuration with good attention to detailing of the individual dwelling plan forms providing energy efficiency and reduced lifetime running costs of the overall scheme. Efficient planning and design have also been brought into the layouts of the individual dwelling units planned, along with apartments and duplex units. The design brief was set to create an exemplar of sustainable design to ensure all new development can be delivered in a manner that protects and enhances the biodiversity of the local environment, mitigates climate change, and delivers high energy efficiency in accordance with NZEB strategies.</p>

Environmental Impact Assessment	Given that 377 no. units are proposed and indeed noting that the application site extends to an overall of c. 10.22 hectares within what can be considered a built-up area, an Environmental Impact Assessment Report is required and has been prepared as part of the proposed application. Please refer to the enclosed EIAR which assesses the overall development and is enclosed with this SHD application for the consideration of the Board.
Screening for Appropriate Assessment	An Appropriate Assessment Screening report has been carried out by OPENFIELD Ecological Services as part of this SHD application which indicate pathways do exist to a number of these areas. A Natura Impact Statement has also been prepared with mitigation measures proposed. An assessment of the aspects of this project has shown that significant negative effects are not likely to occur to these areas either alone or in combination with other plans and projects provided that the mitigation measures outlined are upheld. Please refer to the enclosed Screening Report for Appropriate Assessment and Natura Impact Statement prepared by OPENFIELD Ecological Services for further details.
12.3 Design Criteria for Urban Development	
High Quality Urban Design	<p>The Development Plan defines several objectives to support high quality urban design. It will allow the creation of accessible places where people want to live, work, and spend time. It is the policy of the Council to ensure all development is of a high-quality design and promotes the achievement of accessible, safe, and sustainable built and natural environments, which reflect the special character and heritage of the County and its varied townscapes and landscapes. Design principles are based on the 'Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities' and 'Best Practice Urban Design Manual'. Which contains twelve design principles to be applied to all developments with Objective DMS03 requiring:</p> <p><i>"Submit a detailed design statement for developments in excess of 5 residential units or 300 sqm of retail/commercial/office development in urban areas. The design statement is required to:</i></p> <ul style="list-style-type: none"> ▪ <i>Explain the design principles and design concept.</i> ▪ <i>Demonstrate how the twelve urban design criteria (as per the 'Urban Design Manual - A Best Practice Guide') have been taken into account when designing schemes in urban areas. Each of the twelve criteria is of equal importance and has to be considered in an integrated manner.</i> ▪ <i>Outline how the development meets the Development Plan Objectives, and the objectives of any Local Area Plan, Masterplan, Urban Centre Strategy, Framework Plan, or other similar Plan affecting the site.</i> ▪ <i>Include photographs of the site and its surroundings.</i> ▪ <i>Include other illustrations such as photomontages, perspectives, sketches.</i> ▪ <i>Outline detailed proposals for open space and ensure the provision of open space is designed in from the beginning when designing a new scheme.</i> ▪ <i>Outline a detailed high-quality open space and landscape design plan including specifications, prepared by suitably qualified professionals.</i> ▪ <i>Outline how Green Infrastructure integrates into the scheme."</i>

	<p>In accordance with the aforementioned, an Urban Design and Architectural Statement has been prepared by CCK Architects which sets out the proposed development's compliance with the 12 Urban Design criteria and how the proposed development accords with the requirements of Objective DMS03. Please refer to the enclosed Urban Design and Architectural Statement and associated drawings prepared by CCK Architects for further information in this regard. Please also refer to the detailed landscaping proposals prepared by Doyle O'Troithigh Landscape Architecture.</p>
12.4 Design Criteria for Residential Development	
Residential Zoning	<p>Under the current Fingal County Council Development Plan, the developable subject site is zoned "RA – Residential Area" which seeks: <i>"Provide for new residential communities subject to the provision of the necessary social and physical infrastructure."</i> It is also submitted that the proposed development of residential units and 1 no. childcare facility are permitted in principle under the zoning objectives pertaining to the subject lands. It is noted that the subject site forms part of the Oldtown and Mooretown lands in Swords, which were previously informed by the Oldtown-Mooretown Local Area Plan 2010-2016. The LAP had also been extended for a further five years from 13th July 2015 up to 12th July 2020. Despite expiration of the LAP since, this final phase of the Oldtown lands has been designed and proposed within the spirit of the Plan. The Class 1 open space lands to the north are zoned OS-Open Space – "to preserve and provide for open space and recreational amenities". The proposed open space in this area is therefore permitted in principle under this zoning designation. The proposed storage tank site is zoned ME-Metro Economic Corridor – "to facilitate opportunities for high-density mixed-use employment generating activity and commercial development and support the provision of an appropriate quantum of residential development within the Metro Economic Corridor". The tank can be considered essential infrastructure and has been designed in conjunction with Irish Water. It will not only facilitate the connection requirement of this subject application but will also have the capacity to allow for continued development in the area.</p>
Mix of Dwelling Types	<p>The Development Plan states that the dwelling mix in any residential scheme should provide a balanced range of dwelling types and sizes to support a variety of household types. In this regard, the proposed development provides for 377 no. residential units with 1 no. childcare facility. The proposal provides for a variety of unit types encompassing a mix of one, two and three bed apartments, two, three, and four bed houses, two and three bed duplex units, all of which provide for a mix and variety of unit types in accordance with the Development Plan and indeed the mix requirements as set out within the <i>'Design Standards for New Apartments Guidelines for Planning Authorities'</i> and the <i>'Delivering Homes, Sustaining Communities: Statement on Housing Policy'</i>.</p> <p>Whilst there are different apartment unit types and different house unit types provided, in terms of bedroom provision, it is also important to note that within these units, there is a significant amount of diversity in terms of size, layout, storage, aspect, room dimensions, etc. This ensures that the proposed scheme provides for the various needs of potential future residents and that it is a sustainable form of residential development which can cater for all age demographics and is adaptable and flexible for their future needs, be it, single professionals, young couples, small young families, older families, the elderly, those looking to downsize, etc.</p>

Residential Density & Height	<p>The Development Plan provides that the number of dwellings to be provided on a site should be determined with reference to the <i>'Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities'</i> (2009). As a general principle and to promote sustainable forms of development, higher residential densities will be promoted within walking distance of town and district centres and high-capacity public transport facilities. In this regard, the proposed development provides for a sustainable development with an overall net density of c. 48.3 dwellings per hectare (net developable area is 7.8 ha), on appropriately zoned lands, in an accessible location within the development boundaries of Swords and therefore accords with the density requirements of both the Development Plan and national guidelines.</p> <p>It is also noted that the proposed density is in line with the earlier phases of the Oldtown lands, and within the spirit of the expired Oldtown-Mooretown Local Area Plan 2010-2020 (July).</p>
Apartment Development	<p>The <i>'Design Standards for New Apartments Guidelines for Planning Authorities'</i> have superseded the design standards for apartments as set out in the Development Plan. With regards to Dual Aspect the proposed development provides for 60% dual aspect units within the proposed apartment units in accordance with Objective DMS20 of the Development Plan.</p> <p>The apartment floor areas are also in accordance with the <i>'Design Standards for New Apartments Guidelines for Planning Authorities'</i> as set out in the enclosed Urban Design and Architectural Statement and Housing Quality Assessment (HQA) prepared by CCK Architects. Please refer to the enclosed report for full details on the proposed development's compliance with standards for apartment developments.</p>
Quantitative Standards	<p>The development proposal adheres with the <i>"Quality Housing for Sustainable Communities; Best Practice Guidelines for Delivering Homes and Sustaining Communities (DEHLG, 2007)"</i> and <i>"Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (DEHLG, 2018)"</i> when assessing proposals for apartment development.</p> <p>Please refer to the HQA and Urban Design and Architectural Statement prepared by CCK Architects for compliance in this regard.</p>
Separation Distances	<p>Appropriate separation distances between dwellings have been provided. Furthermore, sufficient separation between side gables has also been provided for in accordance with Objective DMS28 & DMS29 of the Development Plan.</p>
Daylight, Sunlight and Overshadowing	<p>Objective DMS30 of the Development Plan requires that all new residential units comply with the recommendations of <i>'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice'</i> (B.R.209, 2011) and B.S. 8206 <i>'Lighting for Buildings, Part 2 2008: Code of Practice for Daylighting'</i> or other updated relevant documents.</p> <p>For further details in this regard, please refer to the Daylight & Sunlight Assessment as provided by DKPI Environmental.</p>
Acoustic Privacy	<p>Objective DMS31 of the Fingal County Development Plan requires that sound transmission levels in semi-detached, terraced, apartments and duplex units comply as a minimum with the 2014 Building Regulations Technical Guidance Document Part E or any updated standards.</p>

	It is submitted that the proposed development will comply with Objective DMS31 of the Development Plan in this regard. For further details in this regard, please refer to the Noise Chapter of EIAR prepared by DKPI Environmental.
Open Plan Estates	The removal of the exempted development rights is subject to agreement with the Planning Authority and An Bord Pleanála as part of a condition to the granting planning permission.
Gated Communities	Objective DMS32 of the Fingal County Development Plan prohibits proposals that would create a gated community for any new residential developments. It is viewed that the proposed development is not a 'gated community' and will adhere with Objective DMS32 of the Development Plan in this instance.
Management Companies and Facilities for Apartment Developments	<p>Outlined in the Development Plan, higher-density apartment type development will require a management company to maintain communal areas. It is a specific objective to adhere with the following: -</p> <p>Objective DMS33 - <i>Require properly constituted management companies in apartment type schemes are set up and necessary management structures are put in place for the benefit of the residents.</i></p> <p>Objective DMS34 - <i>Provide in high density apartment type schemes in excess of 100 units facilities for the communal use of residents as deemed appropriate by the Council.</i></p> <p>Objective DMS35 - <i>Require the provision of communal laundry rooms and storage facilities in high density apartment type developments where deemed appropriate.</i></p> <p>The proposed apartment/duplex units within the scheme will be privately managed by the establishment of a management company. This management company will be responsible for maintaining the external appearance of the apartments, maintaining the internal and external communal spaces, bins management, etc. It is also important to note that the public parks and main roads are proposed to be taken in charge by Fingal County Council. For information in this regard, please see the enclosed pertaining drawing prepared by CCK Architects.</p>
Refuse Storage and Bins	The proposed development provides for convenient and well-designed proposals for the storage of refuse. For further details, please refer to the Housing Quality Assessment (HQA), and Urban Design and Architectural Statement prepared by CCK Architects. Please also refer to the Operational Waste Management Plan prepared by Enviroguide Consulting.
12.7 Open Space	
Public Open Space	<p>The proposed development provides for an overall of c. 0.8ha Class 2 public open space. This includes outdoor play opportunities for children which are accessible to all within the scheme and the wider community. With respect to the developable site area of 7.8ha, this would provide for 11% public open space provision. It is noted that the Class 1 open space for the proposed scheme is to be provided on OS zoned lands within and forming part of the Swords Regional Park. The proposed scheme would also benefit from green infrastructure conceived for the earlier phases of development at Oldtown.</p> <p>It is submitted that given the proximity of the application site to Swords Regional Park and Broadmeadow Linear Park there is an excellent provision of public open space facilities in the locality. Also, when the Metro is constructed, the Estuary</p>

	stop will be c.3km from Miller's Glen via the Broadmeadow Linear Park, which is a comfortable distance for cyclists, taking c.10 minutes travel time.																																																																		
Private Open Space	In accordance with national policy and particularly the Urban Design Manual and new Apartment Guidelines, the proposed development has achieved appropriate separation distances to maintain privacy and protect residential amenity, with design solutions and appropriate landscaping also proposed to protect privacy for residents. It is noted that each residential unit benefits from the provision of adequately sized private open space in the form of gardens, balconies, or patios/terraces (designed in accordance with quantitative and qualitative standards), with the units at ground floor level provided with appropriate boundary treatments to ensure privacy and security whilst also providing visual interest and distinction between spaces. For further information on the private open space proposed as part of this SHD application, please refer to the Urban Design and Architectural Statement prepared by CCK Architects, and the landscaping pack prepared by Doyle O'Troithigh Landscape Architecture.																																																																		
12.8 Community Infrastructure, Facilities and Services																																																																			
Childcare Facilities	All childcare facilities shall be provided in accordance with the 'Childcare Facilities: Guidelines for Planning Authorities' (DEHLG). The proposed SHD development will provide for a purpose-built childcare facility with a gross floor area of 519 sqm to accommodate approximately 102 children within the site with appropriate outdoor play space, drop off facilities, etc. For further details in this regard, refer to the Childcare Provision Assessment prepared by Downey and enclosed as part of this SHD application.																																																																		
12.10 Movement and Infrastructure																																																																			
Car Parking Standards	Set out under Chapter 12 of the Fingal Development Plan 2017-2023, the car parking standards based on land use provision are as follows: - Table 12.8 - Car Parking Standards																																																																		
	<table><tr><th>Land Use</th><th>Criterion</th><th>Proposed</th><th>Notes</th><th>Category</th><th>Norm or Max</th></tr><tr><td>House - urban/suburban 1 or 2 bedrooms</td><td>Unit</td><td>1-2</td><td>Within curtilage</td><td>Residential</td><td>Norm</td></tr><tr><td>House - urban/suburban 3 or more bedrooms</td><td>Unit</td><td>2</td><td>Within curtilage</td><td>Residential</td><td>Norm</td></tr><tr><td>House - rural</td><td>Unit</td><td>2-3</td><td>Within curtilage</td><td>Residential</td><td>Norm</td></tr><tr><td>Apartment, townhouse 1 bedroom</td><td>Unit</td><td>1</td><td>Plus 1 visitor space per 5 units</td><td>Residential</td><td>Norm</td></tr><tr><td>Apartment, townhouse 2 bedrooms</td><td>Unit</td><td>1.5</td><td>Plus 1 visitor space per 5 units</td><td>Residential</td><td>Norm</td></tr><tr><td>Apartment, townhouse 3+ bedrooms</td><td>Unit</td><td>2</td><td>Plus 1 visitor space per 5 units</td><td>Residential</td><td>Norm</td></tr><tr><td>Sheltered housing</td><td>Unit</td><td>0.5</td><td>Plus 1 visitor space per 5 units</td><td>Residential</td><td>Norm</td></tr><tr><td>Caravan / mobile home park</td><td>Stand</td><td>1</td><td></td><td>Residential</td><td>Norm</td></tr><tr><td>Hotel, Motel, Motor Inn, Guest House</td><td>Bedroom</td><td>1</td><td></td><td>Residential</td><td>Norm</td></tr><tr><td>Pre-school facilities / creche</td><td>Classroom</td><td>0.5</td><td></td><td>Education</td><td>Maximum</td></tr></table>	Land Use	Criterion	Proposed	Notes	Category	Norm or Max	House - urban/suburban 1 or 2 bedrooms	Unit	1-2	Within curtilage	Residential	Norm	House - urban/suburban 3 or more bedrooms	Unit	2	Within curtilage	Residential	Norm	House - rural	Unit	2-3	Within curtilage	Residential	Norm	Apartment, townhouse 1 bedroom	Unit	1	Plus 1 visitor space per 5 units	Residential	Norm	Apartment, townhouse 2 bedrooms	Unit	1.5	Plus 1 visitor space per 5 units	Residential	Norm	Apartment, townhouse 3+ bedrooms	Unit	2	Plus 1 visitor space per 5 units	Residential	Norm	Sheltered housing	Unit	0.5	Plus 1 visitor space per 5 units	Residential	Norm	Caravan / mobile home park	Stand	1		Residential	Norm	Hotel, Motel, Motor Inn, Guest House	Bedroom	1		Residential	Norm	Pre-school facilities / creche	Classroom	0.5		Education	Maximum
	Land Use	Criterion	Proposed	Notes	Category	Norm or Max																																																													
	House - urban/suburban 1 or 2 bedrooms	Unit	1-2	Within curtilage	Residential	Norm																																																													
	House - urban/suburban 3 or more bedrooms	Unit	2	Within curtilage	Residential	Norm																																																													
	House - rural	Unit	2-3	Within curtilage	Residential	Norm																																																													
	Apartment, townhouse 1 bedroom	Unit	1	Plus 1 visitor space per 5 units	Residential	Norm																																																													
	Apartment, townhouse 2 bedrooms	Unit	1.5	Plus 1 visitor space per 5 units	Residential	Norm																																																													
	Apartment, townhouse 3+ bedrooms	Unit	2	Plus 1 visitor space per 5 units	Residential	Norm																																																													
	Sheltered housing	Unit	0.5	Plus 1 visitor space per 5 units	Residential	Norm																																																													
	Caravan / mobile home park	Stand	1		Residential	Norm																																																													
	Hotel, Motel, Motor Inn, Guest House	Bedroom	1		Residential	Norm																																																													
	Pre-school facilities / creche	Classroom	0.5		Education	Maximum																																																													

Figure 7. Car Parking Standards extracted from the Development Plan

	<p>The Development Plan requires that each dwelling to be provided with 2 no. car parking spaces which is being provided within this scheme. The car parking for apartments and duplex units, however, is provided at a reduced rate per unit. Thus, the overall car parking provision may be considered to potentially materially contravene the Fingal Development Plan 2017-2023.</p> <p>However, adherence of the proposed scheme to the national and regional policy guidance in terms of car parking provision reflects the prime location of the development in relation to its connectivity and access to R125 (Rathbeale Road) and public transport services. The Oldtown lands are situated in an accessible location within 3km distance from Swords town centre, which are served by Dublin Bus and Swords Express services. The lands are also accessed via the Glen Ellan Road and Miller's Avenue, a partly completed link road that is also known as the Western Distributor Link Road (WDLR). Moreover, there is access to the site through Miller's Glen development, to which the proposed scheme is an extension. The excellent connectivity of the subject site, in line with the national and regional policy guidance, would allow for a reduced quantum of car parking space which consequently promote green modes of transport as well.</p> <p>Please refer to the enclosed Statement of Material Contravention prepared by Downey, Traffic and Transport report prepared by Waterman Moylan Consulting Engineers, and the Urban Design and Architectural Statement prepared by CCK Architects for further details in this regard.</p>
Bicycle Parking Standards	<p>The proposed development provides considerable secure, covered bicycle parking for the apartment and duplex units as part of the development proposal (440 no. spaces in total). This ensures that future residents and visitors are encouraged to use sustainable modes of transportation. It is considered that the bicycle parking provision as part of the proposed development is consistent with Table 12.9 - Bicycle Parking Standards of the Development Plan, and Section 4.15 of the 2020 guidelines Design Standards for Apartments.</p> <p>Houses are proposed to secure and store their bicycles on their own private property, and all duplex and apartment buildings will have a secure, accessible and sheltered purpose-built store. These are integrated into ground floors of the larger apartment blocks and are provided as individual external storage buildings for duplex units.</p> <p>For further information on the bicycle parking, please refer to the Traffic and Transport report prepared by Waterman Moylan Consulting Engineers, and Housing Quality Assessment (HQA), and Urban Design and Architectural Statement and associated drawings prepared by CCK Architects.</p>

6.2 Oldtown-Mooretown Local Area Plan 2010-2016 (extended to July 2020)

The subject site forms part of the Oldtown and Mooretown lands in Swords, which were previously informed by the Oldtown-Mooretown Local Area Plan 2010-2016. The LAP had also been extended for a further five years from 13th July 2015 up to 12th July 2020 but has now since expired. This final phase of the Oldtown lands has been designed and proposed within the spirit of the Plan. As such, the proposed scheme is considered to comply with the vision and aims of the since expired LAP and pertaining planning guidelines for the application site in the context of the wider Oldtown-Mooretown lands.

7.0 ENGINEERING PROPOSALS

Waterman Moylan Consulting Engineers have prepared an engineering pack for the proposed development. This is included under a separate cover. A Confirmation of Feasibility and Statement of Design Acceptance has been obtained from Irish Water confirming that there is capacity within the network to cater for the development and that the design is in accordance with their standards.

8.0 APPROPRIATE ASSESSMENT SCREENING

The proposed development has been screened for Appropriate Assessment in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/32/EEC). OPENFIELD Ecological Services has prepared a report for Screening for Appropriate Assessment for the proposed development. This screening report has evaluated the proposed development on lands at Oldtown to determine whether or not significant negative impacts on Natura 2000 sites are likely to arise by virtue of its construction and use. Hydrological pathways exist to the Malahide Estuary; at this stage significant effects cannot be ruled out to the following areas: Malahide Estuary SAC and Malahide Estuary SPA.

It is considered that the potential for large quantities of sediment to be washed into the Estuary, due to the proximity of works to the River Broadmeadow, means that significant effects to habitats within the SAC, and species within the SPA, cannot be ruled out at this stage. A full AA is required following on from a full design review of the development. No significant effects are likely to arise to any Natura 2000 site from the proposed stormwater overflow which will substantially reduce current volumes of undertreated effluent entering the River Ward and the Malahide Estuary. OPENFIELD Ecological Services has prepared a Natura Impact Statement for the proposed development. This report contains an analysis of the proposed project and its relationship with areas designated under the Habitats and Birds Directives. Pathways exist between the development site and two such areas and these have been described in detail in the AA Screening Report. Following this analysis, it was concluded that significant effects to the Malahide Estuary SAC and SPA could not be ruled out. Specifically, this may arise from the impact to intertidal habitats and species from pollution during the construction phase. Arising from this assessment, mitigation has been proposed. With the implementation of these measures, adverse effects to the integrity of the Malahide Estuary SAC and SPA will not occur. This conclusion is based on best scientific knowledge. For further information in this regard, please refer to the Appropriate Assessment Screening Report and NIS prepared by OPENFIELD Ecological Services.

9.0 EIA

The EIA Directive 85/337 EEC, as amended, is the key legislation in EU Environmental Policy. The EIA Directive aims to determine the likely significant effects of a project on the environment. Screening is the first stage in the EIA process required by Article 4 of the EIA Directive and this process determines whether an EIA is required for a specific project. The Directive outlines in Article 4(1) 24 Annex 1 projects that require a mandatory EIA. Article 4(2) outlines Annex 2 projects that require consideration for EIA further to a case by case examination or through thresholds and criteria set out by Member States. In an Irish context, projects requiring a mandatory EIA or consideration for EIA further to a case by case examination or thresholds are listed in Schedule 5 of the Planning and Development Regulations.

Development projects requiring an Environmental Impact Assessment Report (EIAR) are set out in Schedule Five of the Planning and Development Regulations, 2001 (as amended). Part 1 of this schedule lists those projects that require a mandatory EIA irrespective of size in any EU Member State whereas Part II identifies the threshold limits for projects that require a mandatory EIA in Ireland. Article 10(b)(i) of Part II 'Infrastructure Projects' indicates that an EIA is required for the construction of more than 500 dwellings. Another threshold is the size of the development site and in this regard, Article 10(b)(iv) requires that an EIAR be prepared for urban developments which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere. In this instance, the application site extends to c. 10.223 hectares within what can be considered a built-up area. Therefore, the project exceeds the stated threshold, and an EIA is therefore required on this basis. In light of this, an Environmental Impact Assessment Report (EIAR) has been prepared for the proposed development and is submitted as part of this application.

10.0 CONCLUSION

This Planning Statement has been prepared to accompany planning application to An Bord Pleanála for a Strategic Housing Development on lands at Oldtown, Swords, Co. Dublin.

The proposed development will consist of the construction of a total of 377 no. residential dwellings, comprising 173 no. houses (9 no. 2 beds, 147 no. 3 beds, and 17 no. 4 beds), 204 no. apartment/duplex units (98 no. 1 beds, 104 no. 2 beds, and 2 no. 3 beds), with 1 no. childcare facility and associated car parking and bicycle parking, landscaping, boundary treatments, and all associated engineering and site development works necessary to facilitate the development including the proposed stormwater storage tank and overflow outfall gravity sewer to the Broadmeadow River with associated manholes on lands locally known as the Celestica/Motorola site, junction of Glen Ellan Road and Balheary Road, and at/on Balheary Road, along with the proposed vehicular/service access onto Balheary Road.

The design of the proposed scheme has been the subject of a full analysis/feasibility study of the proposed site and its surrounding landscape, and it is considered that the proposed development represents a high-quality design whilst optimising the appropriate use of the site. The proposed development is also informed by a series of pre-application meetings with both the Local Authority and An Bord Pleanála, and also the earlier phases of developing the Oldtown lands.

The proposed development will provide for a sustainable residential development on appropriately zoned lands, in an accessible location within the development boundaries of Swords, which would promote compact urban growth and a good quality of life. This will support compact growth of the town and assist in meeting the increasing demand for residential accommodation in Swords and the overall County.

The proposed development comprises a high-quality scheme of an appropriate scale and of a sustainable residential density reflective of its locational attributes proposed within the spirit of the expired Oldtown-Mooretown LAP 2010-2020 (July and since has expired) and in line with the national, regional, and local policy guidance. The Statement of Consistency which accompanies the application demonstrates that the proposed development complies with the relevant planning policy and guidance in the foregoing levels. Please refer to the enclosed Statement of Consistency which sets out

the justifications for the proposed development. Furthermore, the proposal will provide for an effective, efficient, sustainable use of what is a greenfield site in an accessible location. The nature, form and extent of the proposed development has been informed and guided by pre-application consultations with the pertaining Planning Authority and internal departments and the pre-application consultation with An Bord Pleanála.

The proposed dwelling houses and apartment units meet the requirements of Fingal County Council and fully comply with the Fingal Development Plan 2017-2023, and the '*Sustainable Urban Housing: Design Standards for New Apartments*' Guidelines. All unit types proposed meet the minimum gross floor areas required and meet the aggregate living room, living areas, bedroom areas and storage areas required. Please refer to the accompanying drawings/schedule enclosed with this planning application for a full breakdown of living standards for each unit type. The delivery of 377 no. residential units at this location would add to the sense of community in the area, would represent an appropriate and sustainable land use, and would provide for an appropriate use on an otherwise underutilised site. Please also refer to the Urban Design and Architectural Statement prepared by CCK Architects which demonstrates the proposed development's compliance with the relevant planning policy and guidelines.

In light of the above, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area in which it is located as expressed in national, regional and local planning policy and Guidelines issued under Section 28 of the Planning and Development, 2000 (as amended), and as such, it is considered that the proposed development at represents a high-quality Strategic Housing Development proposal which is now being submitted for the consideration of An Bord Pleanála.