



# Statement of Consistency

## **Proposed Strategic Housing Development (SHD) at Holybanks, Swords, Co. Dublin**

On behalf of  
**CAIRN HOMES PROPERTIES LTD.**

**March 2022**

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## 1.0 Introduction

### 1.1 Overview

This Statement of Consistency has been prepared by KPMG Future Analytics Consultants on behalf of Cairn Homes Properties Ltd. in respect of a proposed Strategic Housing Development (SHD) relating to a residential development of 621 no. residential units and crèche facility on a 14.17ha (gross) site within the Estuary West Lands at Holybanks, Swords, Co. Dublin.

This Statement of Consistency is prepared as an accompanying document to a Strategic Housing Development (SHD) application which is lodged with An Bord Pleanála in compliance with Part 2 Section 4 (1) and 5 (1) of the Planning & Development (Housing) and Residential Tenancies Act 2016, as amended, as well as An Bord Pleanála's Guidance for Prospective Applicants.

This report should be read as part of the wider suite of reports accompanying the application. We refer An Bord Pleanála to the Covering Letter enclosed herewith, which clearly sets out a schedule of documents enclosed with this application.

This Statement of Consistency is intended to outline consistency with guidelines issued under Section 28 of the Planning and Development Act (as amended), national and regional planning policy, and the key policies, objectives and development management standards contained within the Fingal County Development Plan 2017-2023.

Table 1-1 Key Development Statistics

<b>KEY DEVELOPMENT STATISTICS</b>	
<b>Site Area</b>	Gross Site Area 14.17 ha (including infrastructure upgrade works) Net Site Area 8.92ha (Developable Site Area)
<b>Gross Floor Area (Residential)</b>	60,511sqm
<b>Density</b>	Net Site Density: 70 Unit/Ha
<b>Plot Ratio</b>	0.69 (Gross 0.43)
<b>Site Coverage</b>	28% (Gross 17%)
<b>Height</b>	1-7 storeys
<b>Total No. of units</b>	621 units
<b>OPEN SPACE</b>	
<b>Public Open Space</b>	10,008sqm
<b>Communal Amenity Open Space</b>	8,541sqm
<b>Public Park</b>	29,400 sqm Broadmeadow Riverside Park
<b>NON-RESIDENTIAL</b>	
<b>Internal Communal Amenity Area</b>	573sqm comprising concierge, gym, meeting room and multi-purpose room
<b>Crèche facility</b>	506.5 sq.m (Capacity 100), Crèche playground 90 sqm
<b>RESIDENTIAL</b>	
<b>Apartments</b>	Total 349 units 1 Bed 137 units 2 Bed 201 units 3 Bed 11 units
<b>Duplexes</b>	Total 154 units 2 Bed 77 units 3 Bed 77 units
<b>Houses</b>	Total 118 units 3 Bed 99 units 4 Bed 11 units

<b>Maisonettes</b>	8 no. 1 Bed units
<b>Dual and triple aspect apartments and duplexes</b>	64%
<b>Part V</b>	62 units
<b>PARKING</b>	
<b>Car Parking Provision</b>	705 no.
<b>Bicycle Parking</b>	856 no.
<b>Motorbikes</b>	21 no. (8no. in basement, 4 no. in undercroft, 9 no. on surface)

## 1.2 Report Structure

The following ministerial guidelines, national and local plans are considered relevant to the current SHD proposal and are discussed in this Statement of Consistency:

- Project Ireland 2040: The National Planning Framework
- Project Ireland 2040: The National Development Plan 2021-2030
- Housing for All – a New Housing Plan for Ireland (September 2021)
- Rebuilding Ireland: Action Plan for Housing and Homelessness
- Smarter Travel – A New Transport Policy for Ireland 2009 – 2020
- Regional Spatial and Economic Strategy for EMRA (2019)
- Urban Design Manual – A Best Practice Guide (2009)
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020)
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) 2009
- Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes, Sustaining Communities (2007);
- Design Manual for Urban Roads and Streets (2013)
- Urban Development and Building Height Guidelines (2018)
- The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009)
- Guidelines for Planning Authorities on Childcare Facilities (2001)
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009)
- Part V of the Planning and Development Act 2000: Guidelines (2017) and Affordable Housing Act (2021), as amended
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018)
- Fingal Development Plan 2017 – 2023
- Non-statutory Swords Masterplans (specifically ‘Part D’ relating to Estuary West)

## 2.0 Strategic Planning Policy Context

The following section provides a summary overview of the how the development proposal aligns with and supports a range of national planning policy guidance documents.

### 2.1 Project Ireland 2040: National Planning Framework

The National Planning Framework (NPF) is the Government’s high-level strategic plan for shaping the future growth and development of the country out to the year 2040. It is a national document that will guide the strategic planning and development of the country over the next 20+ years, so that as the population grows, that growth is sustainable (in economic, social and environmental terms).

The NPF calls for a major new policy emphasis on renewing and developing existing settlements. A shared set of goals for every community across the country, expressed in the Framework as the National Strategic Outcomes, are set out. One of the key goals is to achieve ‘compact growth’ and this is reflected throughout the NPF and through its policies and objectives.

Compact growth is to be achieved by:

- Targeting a greater proportion (40%) of future housing development to be within and close to the existing ‘footprint’ of built-up areas.
- Making better use of under-utilised lands and buildings, including ‘infill’, ‘brownfield’ and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport.
- Supporting both urban regeneration and rural rejuvenation through a €3 Billion Regeneration and Development Fund and the establishment of a National Regeneration and Development Agency.

The strategy for the capital is as follows:

- Supporting the future growth and success of Dublin as Ireland’s leading global city of scale, by better managing Dublin’s growth to ensure that more of it can be accommodated within and close to the city.
- Enabling significant population and jobs growth in the Dublin metropolitan area, together with better management of the trend towards overspill into surrounding counties.
- Addressing infrastructural bottlenecks, improving citizens’ quality of life and increasing housing supply in the right locations.

The NPF sets out that the Eastern and Midland region will, by 2040, grow by over half a million on its current population to around 2.85 million people.

The regions’ ability to accommodate this growth in a successful way, that will safeguard ‘liveability’ or quality of life of urban places, is predicated on achieving the goal of compact urban growth. With this in mind, National Policy Objectives (NPOs) such as no. 3a and b are established:

**NPO 3a** *‘Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.’*

**NPO3b** *‘Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints’.*

It is within this high-level strategic context, that the proposed development at Holybanks, is positioned and to which the proposal for 621 new housing units on the edge of Swords, a Key Town within the suburban area of Metropolitan Dublin, directly contributes. The NPF recognises that Dublin needs to accommodate a greater proportion of the growth it generates within its metropolitan boundaries and to offer improved housing choice, transport mobility and quality of life. This development at Holybanks in Swords, presents an opportunity to achieve this through the provision of high-quality housing, designed to cater to a wide spectrum of the housing market, from families to single professionals and downsizers and in close proximity to public transport. In doing so, the development will contribute to NPO 4:

**NPO 4** *‘ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being’.*

Swords, with its proximity to Dublin Airport and in the context of the new Metro line, is specifically called out for the opportunities it presents in achieving compact development, such as infill or a sustainable urban extension, supported by its high-capacity public transport and significant employment and amenity provision.

*“It would be reasonable in the context of a Metropolitan Area Strategic Plan and phasing-in the transition to achieving urban consolidation and brownfield targets, that a proportion of up to 20% of the phased population growth targeted in the principal city and suburban area, could potentially be accommodated in the wider metropolitan area i.e. outside the city and suburbs or contiguous zoned area. This would be in addition to growth identified for the Metropolitan area. This would be subject to any growth relocated from the city and suburbs comprising compact development, such as infill or a **sustainable urban extension, served by high-capacity public transport** and/or significant employment and amenity provision. The future development of Swords in Fingal, Dublin, in the context of a new Metro line and proximity to Dublin Airport, is an example where this will be applicable.” (NPF p135)*

Green field development, particularly on sites that are integrated to the existing built-up areas of settlements and serviced by high-capacity public transport are among the optimal locations in which to achieve compact urban growth. A Public Transport Assessment prepared by an independent public transport consultant and submitted with this application concludes that the *“The bus market at this location is well developed for a strongly growing area and has a uniquely high level of commercial bus operations run by Swords Express that will respond quickly to any growth in demand to capture market share”*. And further *“the current capacity in the bus network is more than capable of handling the hoped-for bus modal share from the Holylands development”*. (page 23 Public Transport Capacity Assessment report).

By bringing forward a high-density residential scheme in an existing urban area adjacent to existing and proposed public transport facilities, the proposed development can contribute to NPO 11:

**NPO11** *‘There will be a presumption in favour of development that encourages more people, jobs and activity within existing urban areas, subject to development meeting appropriate planning standards and achieving targeted growth’.*

Through a carefully considered design process, McCrossan O’Rourke Manning Architects have delivered a proposed scheme layout that optimises the natural assets of this attractive site, effectively blending the natural aesthetic of the Broadmeadows lands, with a medium to high density urban development that will ensure a high quality of life for its future residents. The existing site is

underutilised and presents a key opportunity site for development of a residential scheme. The proposed building heights range from 2 no. storeys houses to 7 no. storeys(max) apartments. The proposed density and height of the development is considered appropriate for the location of the site and the availability of public transport facilities and proximity to a Key District Centre (Swords). In doing so, the proposal aligns with NPO 13:

**NPO 13** *‘in urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria enabling alternative solutions that seek to achieve well-designed high quality and safe outcomes in order to achieved targeted growth and that protect the environment’.*

The NPF places a strong emphasis on quality of life and place, duly recognising that *“place is intrinsic to achieving good quality of life - the quality of our immediate environment, our ability to access services and amenities, such as education and healthcare, shops and parks, the leisure and social interactions available to us and the prospect of securing employment, all combine to make a real difference to people’s lives”*. On a local site and at an individual development proposal level, the residential scheme now brought forward for consideration, benefits from an optimally located site, in close proximity to a broad range of existing community services, a high-quality natural landscape for future residents to enjoy, and a high frequency public transport network. These are all assets that will contribute to sense of place and quality of life for future residents. Furthermore, the proposal has sought to create a highly permeable public realm that encourages sustainable transport modes, most notably walking and cycling, with a direct connection to the proposed Metrolink stop at Estuary Park and Ride. In doing so, the development aligns with NPO 27:

**NPO 27** *‘Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.’*

Having regard to the above, it is respectfully submitted that the proposal is a suitable form, design and scale of development for this strategically located underutilised site, within an existing urban settlement. The NPF specifically identifies Swords as an area suitable for residential development *‘in the context of a new Metro line and proximity to Dublin Airport.’* The proposed development meets and complies with the objectives of the NPF, bringing a fully serviced site, close to public transport and infrastructure into beneficial use providing much needed housing in a strategic location.

Finally, the development proposal at Holybanks also contributes to the range of NPOs set out under the Housing section of the NPF (Section 6.6). National Core Principles are established to guide the delivery of future housing, at every level of Governance. The planning and design process adopted in bringing forward this scheme has carefully considered these principles and directly contributes to five of them:



Table 2-1 National Core Principles set out to guide the delivery of future housing, Section 6.6, National Planning Framework: Ireland 2040

National Core Principles to Guide the Delivery of Future Housing	The Holybanks Development Proposal
<p><i>Ensure a high standard quality of life to future residents as well as environmentally and socially sustainable housing and placemaking through integrated planning and consistently excellent design.</i></p>	<p>The proposed SHD at Holybanks has evolved over the course of an extensive engagement process with An Bord Pleánala and Fingal County Council. We believe the final development proposal presented embodies the best planning and design approaches possible for the site. It is reflective of the key principles set out for the lands in the Estuary West Masterplan, while also ensuring an appropriate response to high level strategic objectives for the growth and development of Swords set out in county, regional and national planning policy. All of the homes proposed will deliver high levels of residential amenity to future occupants – from an internal design perspective and from the perspective of the outdoor spaces (private open spaces and/or communal open spaces, parking and services) available within the curtilage of each individual home.</p> <p>One of the most appealing features of the scheme is the quality of the landscaping and public realm proposals – with multi-functional public open spaces that present effective integrated drainage, ecological, amenity and sustainable mobility features. There are several well located and easily accessible play areas, rest areas, and adult recreation spaces. These can all be reached by the permeable network of pedestrian paths and cycleways that navigate through the streets and open spaces areas. The mobility network has also sought to promote integration with the wider area, facilitating access from surrounding communities to the new Broadmeadow Riverside park to the north of the site. In a significant planning gain for surrounding neighbourhoods, residential communities to the west and south of the site will be able to freely move through the scheme and/or the riverside park in order to reach the forthcoming Estuary West Park and Ride Metrolink to the northeast.</p>
<p><i>Allow for choice in housing location, type, tenure and accommodation in responding to need.</i></p>	<p>As one of the foremost housing developers in the country, the applicant, Cairn Homes Properties Ltd, is exceptionally attuned to property market trends and preferences. The Holybanks scheme is designed to offer a choice of housing that meets existing and predicted demand for new homes in the Swords area. The company closely monitors a broad range of socio-economic factors such as demographics, employment and income range that influence market preferences and develops schemes in response to this. In this case, the strategic location of Swords means that it has a broad appeal with all consumer segments seeking housing in the area. As such, the scheme provides a balanced mix of houses, duplexes and apartments that can cater for small to large families, single people, empty nesters and downsizers, and couples. The range of dwelling types on offer will result in the creation of a diverse new settlement that will enhance community life in this part of Swords.</p>

<p><i>Prioritise the location of new housing provision in existing settlements as a means to maximising a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure.</i></p>	<p>Situated on the north west fringe of the built-up area of Swords and surrounding by a mix of residential, commercial and community uses, this scheme is ideally located to ensure a high quality of life for future residents. Residents will benefit from convenient access to high frequency and high-capacity bus network and to the future Metrolink rail corridor. The proximity to the M1/M50 road network further enhances the accessibility of the area, as does the presence of Dublin Airport just minutes away. The scheme will deliver a new population to support the efficient use of public transport, particularly important for the proposed Metrolink rail route. Finally, by opening up safe and attractive access to the Broadmeadow Riverside park, the ambition to make greater use of this natural amenity area is realised.</p>
<p><i>Tailor the scale and nature of future housing provision to the size and type of settlement where it is planned to be located.</i></p>	<p>The site location within the Estuary West Masterplan lands is specifically designated to accommodate a residential scheme (alongside complementary uses) with the Metro-Economic corridor zoning objective confirming this intention. The scheme is reflective of population targets set out in the RSES for the Swords area. The density proposed is entirely appropriate to the area and will ensure the delivery of a suitably scaled new housing development in an appropriate location.</p>

## 2.2 Project Ireland 2040: National Development Plan 2021-2030

The National Development Plan 2021 – 2030 (or “NDP”) was published in 2021 as an updated version of the previous National Development Plan 2018 – 2027. As part of Project Ireland 2040, the NDP sets out the Government’s over-arching investment strategy and budget for the period 2021-2030.

It is an ambitious plan which places a major focus on improving the delivery of infrastructure projects to ensure both speed of delivery and value for money across all projects. The Document sets out funding to underpin key Government priorities, including allocations which will support the realisation of critical goals laid out in *Housing for All – a New Housing Plan for Ireland* (September 2021). The NDP underpins the overarching message of the National Planning Framework (“NPF”)

Given the location of the subject site and its close proximity to existing services such as public transport and amenities, it is considered that the proposals align with the principles outlined in the National Development Plan. Moreover, the development also aligns with the principles and objectives of the Housing for All – a New Housing Plan for Ireland (see below).

## 2.3 Housing for All, A New Housing Plan for Ireland (2021)

A new National Plan addressing housing supply has been launched for the period 2021-2030. According to *‘Housing for All – A New Housing Plan for Ireland’* (2021), Ireland needs an average of 33,000 homes constructed per annum until 2030 to meet targets set out for additional households as outlined in the National Planning Framework up from approximately 20,000 homes a year. “Increasing New Housing Supply” is one of four pathways identified by the Plan to achieve the objectives.

Under this pathway, new arrangements will be introduced for Large-Scale Residential Developments (LSRD) that will replace the current Strategic Housing Development (SHD) arrangements. The proposed development will contribute to the increased supply required to meet the demand for housing in Dublin, whilst also providing a range of different housing typologies and a creche facility also.

It is considered that the development, if granted planning permission, would positively contribute towards the housing targets as illustrated above. Moreover, the construction of an additional 621no. residential units would greatly benefit the area by providing much needed housing.

## **2.4 Action Plan for Housing and Homelessness: Rebuilding Ireland (2016)**

The *Action Plan for Housing and Homelessness: Rebuilding Ireland* document highlights that a very significant increase in new homes is required in order to tackle homelessness in Ireland. In order to address issues around housing and homelessness, the Action Plan outlines a five-pillar strategy which is as follows: -

- Pillar 1 – Address Homelessness;
- Pillar 2 – Accelerate Social Housing;
- Pillar 3 – Build More Homes;
- Pillar 4 – Improve the Rental Sector; and
- Pillar 5 – Utilise Existing Housing.

In relation to the proposed development, it is considered that the proposals directly address Pillar 1 and Pillar 3 in particular. It is noted, however, that a number of these pillars are inter-related and therefore the proposal will, to an extent, have a positive impact on each of the abovementioned pillars individually and collectively.

## **2.5 Smarter Travel: A Sustainable Transport Future (2009)**

The *Smarter Travel – A Sustainable Transport Future: A New Transport Policy for Ireland 2009 – 2020* document was first published in 2009 by the Department of Transport and includes a number of key goals (as set out below), which aim to promote sustainable travel throughout the country. The key goals are as follows: -

- (i) To reduce overall travel demand;
- (ii) To maximise the efficiency of the transport network;
- (iii) To reduce reliance on fossil fuels;
- (iv) To reduce transport emissions; and
- (v) To improve accessibility to public transport.

Given the location of the subject site and its close proximity to the proposed Metrolink station, Estuary Park and Ride, Dublin Bus routes and the Swords Express Bus Service routes, it is considered that the proposals would align with the key goals above in terms of promoting sustainable travel and improved accessibility and reduced reliance on fossil fuels.

## **2.6 Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly, 2018**

Due to its strategic location in proximity to Dublin City, the airport, national road network and with the planned Metrolink, Swords acts as a Key Town for the metropolitan area. With a young and growing population of over 39,000 people in 2016, the town performs strong economic and service functions for its catchment area. Key priorities are to promote compact growth and enhanced public realm in the town centre along with the planned sequential development of Swords. The town is situated within the Dublin Metropolitan Area and falls under the remit of the Metropolitan Area Strategic Plan (MASP). One of the key growth enablers set out for Dublin City and Metropolitan Area is:

*‘To deliver strategic development areas identified in the MASP, located at key nodes along high-quality public transport corridors in tandem with the delivery of infrastructure and enabling services to ensure a steady supply of serviced sites and to support accelerated delivery of housing.’*

The subject site within the Metro Economic (ME) corridor zoning objective, and the built-up area of Swords town, is among the most suitable of locations to accommodate *‘sustainable, compact, sequential growth’* at a *‘key node along a high-quality public transport corridor’*. This development proposal for the Estuary West lands is an example of where compact growth and the sequential approach have been put to optimal effect. The site, at the western fringe of the built-up area of Swords and within the settlement boundary, has a residential zoning and provides a natural extension of the urbanised environment. It’s position within the Metrolink Corridor means that it is particularly well suited to accommodating a high density SHD that delivers compact urban growth. In bringing forward this integrated proposal for a SHD, crèche and supporting infrastructure, Cairns Homes Properties Ltd is directly responding to the RSES policy direction for Key Towns to *‘commensurate population and employment growth, on high quality public transport corridors coupled with investment in services, amenities and sustainable transport’*.

The development proposal also contributes to the Vision Statement set out in the MASP for the Dublin Metropolitan Area (Figure 2.1). Specifically, the development will contribute to greater choice in the housing market (with a broad typology of units from 1 bed apartments and semi-detached houses to 4 bed family homes) and will support a high quality of life for its future residents owing to its proximity to a range of quality public transport options, and the integrated and attractive public realm with a range of public open spaces and a direct connection to the Broadmeadow riverside park. The transition towards sustainable and low carbon transport modes through the provision of high-quality walking and cycling routes, is realised on a

**Vision Statement**

Over the years to 2031 and with a 2040 horizon, the Dublin metropolitan area will;

“build on our strengths to become a smart, climate resilient and global city region, expanding access to social and economic opportunities and improved housing choice, travel options and quality of life for people who live, work, study in or visit the metropolitan area”

Figure 2-1 Vision Statement for the RSES - MASP

local level by this development proposal, which offers a direct connection to local destinations including the Applewood Neighbourhood Centre and crucially, to the proposed Metrolink station.

The development proposal for 621 no. residential units also supports the RSES objectives for Strategic Employment Development Areas, greenway infrastructure, amenities and retail services through its connected and integrated design which will facilitate residents in accessing local infrastructure, services and facilities and supporting their long-term viability.

### 3.0 Ministerial Guidelines

#### 3.1 Urban Design Manual – A Best Practice Guide, 2009

The *Urban Design Manual*, introduced in 2009, provides the basis for the design and development of developments at the levels of ‘neighbourhood’, ‘site’ and ‘home’. At each level the guide outlines the key considerations to be made by architects and urban designers as they advance their plans and drawings. A description of the ways in which the scheme aligns with the Urban Design Manual is also provided in the Urban and Architectural Design Statement prepared by McCrossan O’Rourke Manning Architects.

**Response:** This proposal adheres to the 12 key considerations to create an attractive and sustainable proposition for the currently undeveloped sites (Table 3.1).

Table 3-1 Urban Design considerations at the levels of ‘neighbourhood’, ‘site’ and ‘home’.

		Context	
Neighbourhood	1	How does the development respond to its surroundings?	<p>Specific characteristics of the site considered in the planning and design of the scheme include the rich natural setting along the Broadmeadow Estuary, historical landscape features including the central hedgerow that runs through the lands, the Jugback Lane boundary and residential communities to the west and south of the scheme, and the remaining portion of the Estuary West Masterplan lands to the east. Each of these elements has been carefully considered and has influenced the layout and design of the scheme both from an architectural and landscaping perspective.</p> <p>The form and scale of buildings proposed within the development respects the existing built environment surrounding the site with the 1 storey maisonettes, 2 storey houses and 3 storey duplexes stepping up to higher apartment blocks to the south of the site. The proposed scheme will provide strong urban frontage for the site along Glen Ellan Road creating an appropriate transition in between the residential units to the west and taller commercial buildings envisaged to the east of the site. The proposed layout and increased density on this site is also well aligned with the recommendations of Estuary West Masterplan. The scheme also provides for a high quality public open spaces, communal amenities, and facilities.</p>
	2	Connections	
		How well connected is the	A well-planned network of pedestrian and cyclist routes permeate through the scheme encouraging high levels of activity and engagement with surrounding communities. The connectivity strategy proposed

		new neighbourhood?	facilitates a high level of connectivity to all surrounding land uses and will support high levels of interaction with existing communities. Several pedestrian and cyclist access points are proposed within the scheme – linking up to the Applewood and Thornhill neighbourhoods, community and retail services to the west, the Glen Ellan road community to the south, the school reservation site and wider Estuary West lands to the east, and to the Broadmeadow Riverside park, high amenity area to the north. The primary vehicular access to the scheme is proposed from Glen Ellan road with an additional access provided from Jugback Lane/Terrace along with a good internal street network that facilitates connections to the east and west.
		Inclusivity	
	3	How easily can people use and access the development?	As described above, the scheme is highly accessible to future residents and to surrounding communities. The linear, connected public open space area that forms a central spine through the scheme offers a safe and attractive environment for walkers and cyclists from surrounding communities to access the Broadmeadow Riverside park within the northern portion of the scheme. There are also direct pedestrian access points from the west (at a midpoint onto Jugback Lane and directly from Thornleigh parkland to the west) and from Balheary Road in the northeast.  A range of typologies are proposed in a variety of both size and designs to meet the accommodation needs of a range of people and households.
		Variety	
	4	How does the development promote a good mix of activities?	Variety within the development is achieved through a diverse range of residential typologies which will cater for all demographics. As can be seen on the accompanying Site Layout and Landscaping Plans submitted with this application, a variety of play and recreation areas are incorporated throughout the scheme. These offer residents a choice of activities depending on their needs from natural play areas for children to quiet, rest and relaxation areas along the Broadmeadow River and adult recreation areas.
		Efficiency	
Site	5	How does the development make appropriate	A density of 70uph has been achieved through a balanced mix of houses, duplexes and apartments. The quantum of building area is proportionally balanced

		use of resources, including land?	with the level of natural, landscaped areas proposed for the site. Given the strategic location of the scheme within the ME Corridor and at the edge of Swords which is a priority area to accommodate future population growth, the proposed development will ensure the efficient and optimal use of this important landbank.
	6	Distinctiveness	
		How do the proposals create a sense of place?	Great care has been taken to ensure the delivery of an attractive new neighbourhood that will create a happy and health place for residents to live. As the Urban and Architectural Design and Landscaping Statements submitted with this application show, an effective blend of natural and built elements with attractive, tree lined streetscapes and retention/enhancement of many of the unique original features of the site will work together to create a strong identity and sense of place. Character areas within the development are directly influenced by the three different building typologies which are described in the Urban and Architectural Design Statement. Each typology generates a distinctive aesthetic which together with the materials proposed will provide legibility within the overall development. A coherent architectural language and consistency will be set through the use of repeating elements (materials, window types, balcony treatments, etc.) to visually tie the scheme together
	7	Layout	
		How does the proposal create people friendly streets and spaces?	The proposal has an easily navigable and legible street structure, that consists of a primary road access running north south from Glen Ellan Road and intersected by the road from Jugback Lane/Terrace running in an east west direction. A number of secondary roads connect to this road to increase permeability through the site.  A number of new pedestrian connections are provided from Jugback Lane/Terrace, Glen Ellan Road, and proposed Broadmeadow Riverside Park extension. A segregated cycle/ pedestrian path is proposed through the site within the central green spine connecting Glen Ellan Road in the south with the Broadmeadow Riverside Park in the north. This will result in a pedestrian friendly atmosphere within the scheme that is both inviting and safe for all users.
	8	Public Realm	

		How safe, secure and enjoyable are the public areas?	Overlooking, passive surveillance of public and semi-private open spaces has been achieved throughout the scheme. Landscape proposals include subtle features to segregate public open space with the semi-private open spaces. The proposals include attractive, segregated pedestrian/cycle paths through the central green spine running north south through the site connecting Glen Ellan Road in the south to the proposed Broadmeadow Riverside Park running east west along the north side of the site. The proposed lighting plan by Sabre consultants ensure that the open spaces are well lit while not compromising on the safety of sensitive ecological features of the site.
Home	9	Adaptability	
		How will the buildings cope with change?	The proposal is for a variety of residential unit types that include maisonettes, apartments, duplex types, semi-detached and detached houses. All apartment units are served by lift cores that is adaptable for all ages and abilities. All houses have the ability to be altered and extended without negatively impacting surrounding uses. The internal space also designed with a flexible approach, that allows for addition and removal of walls to create different spaces as per the needs of future residents.
	10	Privacy and Amenity	
		How does the scheme provide a decent standard of amenity?	Apartments, duplexes and houses have been designed in compliance with the guidelines set out in Sustainable Urban Housing: Design Standards for New Apartments, March 2018 and Fingal Development Plan 2017 – 2023. Each dwelling unit within the scheme is provided with an ample amount of private open space in the form of balconies, terraces and rear garden in line with the standards. 64% of the apartment and duplex units are designed as dual aspect units.
	11	Parking	
		How will the parking be secure and attractive?	Parking for the scheme is provided at surface, under-croft and basement level. Houses and duplex units are provided with on-street surface parking that is well overlooked and within easy reach of each residential unit. A single level basement has been provided for Block B and an under-croft area is provided within Block A incorporating parking areas, and other ancillary services. A total 705 no. car parking spaces are



			<p>proposed – 228 no. for houses and maisonettes, 176 no. for duplexes, 266 no. for apartments, 12 no. EV parking spaces, 14 no. accessible spaces, 5 no. car sharing spaces and 4. No spaces for the creche. The quantum of parking provided in the scheme is sufficient for the proposed scale of development taking into consideration its accessibility to existing and proposed public transport corridors.</p> <p>A total of 874 no. bike spaces, including bike spaces for visitors and creche provision, are provided in the scheme.</p>
	12	<p>Detailed Design</p> <p>How well thought through is the building and landscape design?</p>	<p>The overall choice of materials and elevation will result in enhancing the surrounding area and complement the landscape features. Landscaped areas are designed to be accessible for easy and regular maintenance. Please refer to the Urban and Architectural Design Statement by McCrossan O’Rourke Manning Architects for details on the proposed materials and finishes for the development. Please also refer to the Landscape Design Report by Cunnane Stratton Reynolds (CSR).</p>

### 3.2 Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities, 2020

All of the apartment units (and duplex units, where relevant) proposed have been carefully designed in accordance with the Guidelines for Planning Authorities published in March 2018 and updated in 2020. A summary of compliance aspects is set out below. For details on evidence of compliance with the Apartment Guidelines, please refer to the Housing Quality Assessment and architectural drawing pack prepared by McCrossan O’Rourke Manning Architects.

#### 3.2.1 Unit Mix

**Specific Planning Policy Requirement (SPPR) 1:** *Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms.*

**Response:** The apartment and duplex elements of the development comprise of 503 units. 145 no. one bedroom apartments are provided in the scheme amounting to 23% of the scheme and 41.5% of the total no. of apartments. This ratio complies with the SPPR 1 requirement.

#### 3.2.2 Minimum Floor Area

**Specific Planning Policy Requirement(SPPR) 3:** *Minimum Apartment Floor Areas:*

- *Studio apartment (1 person) 37 sq.m*
- *1-bedroom apartment (2 persons) 45 sq.m*

- 2-bedroom apartment (4 persons) 73 sq.m
- 3-bedroom apartment (5 persons) 90 sq.m

Section 3.8 of the Guidelines also states: ‘The majority of all apartments in any proposed scheme of 10 or more apartments shall exceed the minimum floor area standard for any combination of the relevant 1, 2- or 3-bedroom unit types, by a minimum of 10%’.

**Response:** A detailed Housing Quality Assessment has been provided by McCrossan O’Rourke Manning Architects and included in the architectural package accompanying this application, illustrating in tabular format how the proposed apartments comply with and exceed SPPR 3 and requirements of the Guidelines. The majority of apartments proposed exceed the requirements of the Guidelines.

### 3.2.3 Dual Aspect

**Specific Planning Policy Requirement (SPPR) 4:** In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

- (i) *A minimum of 33% of dual aspect units will be required in more central and accessible urban locations, where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate.*
- (ii) *In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.*

**Response:** A total of 320 no. apartment and duplex type units are designed to benefit from dual or triple aspect, comprising 64% of all apartment unit types (503 no.).

There are a limited number of north facing single aspect apartment units proposed within the scheme. As required by the Apartment Guidelines they are designed to overlook a high-quality landscaped amenity area. As per Section 3.18 of Design Standards for New Apartments Guidelines for Planning Authorities, 2020 – “North facing single aspect apartments may be considered, where overlooking a significant amenity such as a public park, garden or formal space, or a water body or some other amenity feature.”

The scheme complies with the SPPR in this regard. The accompanying HQA, prepared by McCrossan, O’Rourke Manning identifies the location of dual aspect units.

### 3.2.4 Internal Layout Requirements

**Specific Planning Policy Requirement 5:** *Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use.*

**Response:** All ground floor apartments have a floor to ceiling height of 2.7m in compliance with the Guidelines and SPPR 5.

**Specific Planning Policy Requirement 6:** *A maximum of 12 apartments per floor per core may be provided in apartment schemes.*

**Response:** The proposed scheme fully complies with the requirement with all lift cores matching or falling below the maximum stated of 12 units per core. At an average only 8 units per core are provided demonstrating the higher amenity for the residents of the scheme.

### 3.2.5 Car Parking

Section 4.18 of the Apartments Guidelines 2020 states that *“the quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria”*.

The Holybanks scheme could arguably qualify as a central and/or accessible location and would certainly qualify as an intermediate / urban location. For the former, the default policy is for car parking provision to be minimised, substantially reduced, or wholly eliminated in certain circumstances (Section 4.19).

For the latter (an intermediate/ urban location), planning authorities **must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard** (Section 4.20).

While acknowledging the non-statutory nature of the Masterplan, further justification for a reduced parking rate is set out in the Estuary West Masterplan, Part D which states that:

*‘Within areas highly accessible to public transport (800m to a QBC or high-quality bus service, or 1600m to an existing or planned Luas/DART/Metro/Rail station), the Fingal Development Plan seeks to encourage a mode shift in favour of public transport, by reducing the maximum car parking standard by 50%’.*

**Response:**

The parking provision for apartment and duplex units in the scheme is 473 no. spaces amounting to a parking ratio of 0.94. This includes 5 no. car sharing spaces, 14 no. accessible spaces, and 12 no. EV spaces. This level of parking is considered appropriate given the central or intermediate urban location of the scheme, and its proximity to high frequency public transport corridors, in alignment with the Apartment Guidelines 2020.

The site is well served by Dublin Bus with the bus service routes 41A, 41C, 41X and 43 serving the Glen Ellan Estate (Business Park). Further west at the Jugback Lane – Glen Ellan Road, this point is served by both Dublin Bus (routes 41A, 41C, 41X and 43) and Swords Express routes 500, 500-X, 500-N, 501 and 503) allowing easy access to Dublin City Centre. The Swords Express Service is also available 200m from the site. During peak hours this is a high frequency service with 22 busses from Glen Ellan Road to the city centre between the hours of 6.22 and 9am which equates to a bus approximately every 7minutes. In the evening peak there is a similar service with 21 buses leaving the city centre traveling to Glen Ellan Road between the hours of 5pm and 7pm equating to a frequency one bus every 5min 45seconds. Residents may also avail of the high frequency BusConnects routes serving Applewood (Route X79) and Glen Ellan Road (Route 22). In addition, the Swords Express Bus Service to the City Centre, and the proposed BusConnects Core Bus Corridor (CBC), will enhance the public transport offer available to residents. A Public Transport Capacity report commissioned by Cairn Homes Properties Ltd. and undertaken by Derry O’Leary, Transport Consultant, sets out the available spare capacity in the local bus network. This report should be read in conjunction with the Traffic and Transport Assessment undertaken by Waterman-Moylan. The Capacity report concludes that *“the bus market at this location is well developed for a strongly growing area and has a uniquely high level of commercial bus operations run by Swords Express that will respond quickly to any growth in demand to capture market share. The NTA’s Bus Connects proposals confirm the importance of the Glen Ellen Road as a major growth axis in Swords, itself the fastest growing town in the Dublin area. The Holybanks development will serve to consolidate residential density in the area and thereby strengthen the market for bus services. A key attraction is that the development of the site has no great reliance on the proposed Metro service for Swords.*

*The bus network in this area, post Metro, will likely be largely retained in its current or Bus Connects format. The current capacity in the bus network is more than capable of handling the hoped for bus modal share from the Holybanks development”.*

As is described in Section 2.2.1 of the Planning Report accompanying this application, the proposed Metrolink station, Estuary Park and Ride, is located approximately 600m from the northeast corner of the site, a short walk for residents of approximately 5-10 minutes through the Broadmeadow River Park.

At 228 no. spaces, car parking provision for the housing units is in alignment with the standards set out in Table 12.8 of the County Development Plan which requires 1-2 spaces one- and two-bedroom homes and 2 spaces for homes with 3 or more bedrooms. Please refer also to Section 4.3.9 for details of compliance with the County Development Plan standards on car parking for housing.

Please also refer to the Parking Strategy and Mobility Management Plan prepared by Waterman Moylan Consultant Engineers for full details on parking location and distribution. The Material Contravention Statement accompanying this application sets out a justification for the reduced parking rate for apartments.

### 3.2.6 Bicycle Parking

The Design Standards prescribe a general minimum standard of 1 bicycle parking space per unit, and additional visitor parking spaces at a rate of 1 space per 2 residential units, allowing that deviation from these standards may be justified *“with respect to factors such as location, quality of facilities proposes, flexibility for future enhancements/enlargements, etc.”*

**Response:** The proposed development will provide for 848 no. (excluding 8 no. spaces provided for Childcare) bicycle spaces solely for the apartment and duplex units. It is not anticipated that the proposed houses or duplex units will generate additional demand for external bicycle parking spaces. Bike parking is provided within under-croft level for residents of Block A and within basement for residents of Block B. For the 154 no. duplex units 240 spaces are provided at surface level within secured storage areas at 1.5 ratio. In addition, 80 spaces have been provided at surface level for visitors.

### 3.3 Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) (2009)

The *Sustainable Residential Development* guidelines provide guidance for the design and development of residential schemes, outlining key considerations for their successful and sustainable delivery. The Guidelines also outline the potential residential densities that should be realised in different development situations. Planning Authorities should promote increased residential densities in appropriate locations, including city and larger town centres (defined for the purposes of these guidelines as towns with 5,000 or more people).

- The guidelines note that where there is good planning, good management, and the necessary social infrastructure, higher density housing has proven capable of supporting sustainable and inclusive communities. In general, increased densities should be encouraged on residentially zoned lands and can include Outer Suburban / ‘Greenfield’ sites. These may be defined as open lands on the periphery of cities or larger towns whose development will require the provision of new infrastructure, roads, sewers and ancillary social and commercial facilities, schools, shops, employment and community facilities.
- Studies have indicated that whilst the land take of the ancillary facilities remains relatively constant, the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally. Development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares.
- Section 5.8 of the Guidelines recommends that ‘in general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes’.

**Response:** The proposed development provides for a density of 70 units per hectare. The proposed density is considered suitable for the subject site given the proximity to public transport, 200m from the Swords Express Bus stop and 500m from Swords Business Park. During peak hours this is a high frequency service with 22 busses from Glen Ellan Road to the city centre between the hours of 6.22 and 9am which is a bus approximately every 7 minutes. In the evening peak there is a similar service with 21 busses leaving the city centre traveling to Glen Ellan Road between the hours of 5pm and 7pm equating to a frequency one bus every 5 min 45 sec’. This is an unquestionably high frequency service during peak periods. In addition to the Swords Express, Dublin Bus has three existing services which serve the site:

- 41a: Lower Abbey Street – Swords Manor
- 41c: Lower Abbey Street – Swords Manor
- 43: Talbot Street – Swords Business Park

Monday to Friday these services run every 20 – 30 minutes. BusConnects is due to be introduced in Swords with the subject site located adjacent routes serving Applewood (Route X79) and Glen Ellan Road (Route 22) that connects the site with City Centre and UCD. On completion, this is expected to significantly reduce journey times to city by 40% - 50%.

A Public Transport Capacity report commissioned by Cairn Homes Properties Ltd. and undertaken by Derry O’Leary, Transport Consultant, sets out the available spare capacity in the local bus

network. This report should be read in conjunction with the Traffic and Transport Assessment undertaken by Waterman-Moylan. The Capacity report concludes that *“the bus market at this location is well developed for a strongly growing area and has a uniquely high level of commercial bus operations run by Swords Express that will respond quickly to any growth in demand to capture market share. The NTA’s Bus Connects proposals confirm the importance of the Glen Ellen Road as a major growth axis in Swords, itself the fastest growing town in the Dublin area. The Holybanks development will serve to consolidate residential density in the area and thereby strengthen the market for bus services. A key attraction is that the development of the site has no great reliance on the proposed Metro service for Swords. The bus network in this area, post Metro, will likely be largely retained in its current or Bus Connects format. The current capacity in the bus network is more than capable of handling the hoped for bus modal share from the Holybanks development”*.

- In addition to recommending appropriate densities, the Guidelines focus on the provision of sustainable residential development, including the promotion of layouts that:
  - Prioritise walking, cycling and public transport, and minimise car use;
  - Easy to access for all users and to find one’s way around;
  - Promote the efficient use of land and of energy, and minimise greenhouse gas emissions; and
  - Provide a mix of land uses to minimise transport demand.
  - Reduce traffic speeds in housing developments

**Response:** The layout of the proposed scheme has been designed to be highly accessible for future occupants as well as the existing community. The highly permeable layout incorporates new cycleways, pathways, public open space and connections to the Broadmeadow River via extensive pedestrian pathways and connections to the existing facilities at Applewood Neighbourhood Centre. The connectivity strategy for the scheme has been designed on consideration of the vision and principles for connectivity set out within the non-statutory Estuary West Masterplan, May 2019. Please refer to Car Parking Strategy and Mobility Management Plan by Waterman Moylan and to the Connectivity strategy set out in the Urban and Architectural Design Statement by MCORM. Please refer to Section 3.5 below for further information and compliance with DMURS.

The Guidelines also provide guidance on the core principles of urban design when creating places of high quality and distinct identity. The Guidelines recommend that planning authorities should promote high quality design in their policy documents and in their development management process. In this regard, the Guidelines are accompanied by a Design Manual discussed below which demonstrates how design principles can be applied in the design and layout of new residential developments, at a variety of scales of development and in various settings.

**Response:** The proposed scheme provides a wide variety of housing typologies including, duplexes, one, two- and three-bedroom apartments, semi-detached and terraced houses. Each house is provided with its own private open space, whilst each apartment is provided with a balcony or terrace with ample open space also provided throughout the site. Placemaking principles have been implemented throughout the scheme with permeable spaces provided with passive and active surveillance available to all public areas.



Figure 3-1 Computer Generated image of internal streets within proposed scheme

### 3.4 Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes, Sustaining Communities, 2007

Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes, Sustaining Communities was published by the former Department of Environment, Heritage and Local Government in 2007. These Guidelines were prepared to inform the design of residential developments (houses in particular) with respect to minimum standards, individual unit design, materials, unit mix, open space, site selection, layout, connectivity, placemaking, safety and security, transport, services and delivery. Many of the foregoing considerations also feature in more contemporary Guidelines. The policy statement is accompanied by Best Practice Guidelines that promotes quality sustainable residential development in urban areas.

The proposed development has been designed to adhere to the policies, principles and objectives of the Guidelines (where not superseded), and this is evident in the Architectural Drawings Urban and Architectural Design Statement and Housing Quality Assessment prepared by McCrossan O'Rourke Manning Architects.

### 3.5 Design Manual for Urban Roads and Streets (DMURS), 2013

The connection between transport and planning and development is illustrated in the *Design Manual for Urban Roads and Streets* (DMURS) published in 2015 and updated in 2019. The Design Manual emphasises the need for streets and roads to efficiently support the movement of people, by foot, bike, private car or public transport. However, such movement must be done in conjunction with the development of a coherently planned built environment.

Furthermore, a prioritisation or hierarchy of users is promoted, whereby pedestrians are “*considered first*”, followed by cyclists, public transport, and private motor vehicles. Using such an approach makes sustainable transport modes (walking, cycling and public transport) more attractive (safer, enjoyable, efficient and cheaper).

A DMURS Statement has been prepared by Waterman Moylan Consulting Engineers and accompanies the application pack. The statement demonstrates how the design for the proposed residential development incorporates the key design principles set out within the DMURS – Connected Networks, Multi-Functional streets, pedestrian focus, Multi-disciplinary approach. The statement also shows how the proposed development is consistent with the objectives set out in DMURs to create better street designs that encourage people to walk or use public transport over the private car.

### 3.6 Urban Development and Building Heights Guidelines, 2018

The Urban Development and Building Height Guidelines was prepared in response to the National Planning Framework: Ireland 2040 that favoured higher buildings at location with good public transport corridors and major transport nodes. The Specific Planning Policy Requirements (SPPR) set out within the guidelines takes precedence over any conflicting local policies and objectives as per section 28(1c) of the Planning and Development Act 2000 as amended.

*SPPR 1: In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores... to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.*

In accordance with the development management criteria of the Urban Development and Building Height Guidelines, 2018, the proposed development is on a site that is well served by public transport with a frequent service available to future residents (both Dublin Bus and proposed Metrolink Park & Ride Stop at Estuary West). Residents may also avail of the high frequency (every 10-15 min) routes serving Applewood (Route X79) and Glen Ellen Road (Route 22) that connects the site with City Centre and UCD. Currently the site is served at the frequency of approximately one bus every 7 minutes during peak hours by Swords Express routes: 507, 500, 503, 500X and by Dublin Bus routes 41a, 41c, 43 daily. The site is therefore well accessible by public transport services both existing and proposed and thereby suitable for higher density and building height.

A Public Transport Capacity report commissioned by Cairn Homes Properties Ltd. and undertaken by Derry O’Leary, Transport Consultant, sets out the available spare capacity in the local bus network. This standalone report should be read in conjunction with the Traffic and Transport Assessment undertaken by Waterman-Moylan. The Capacity report concludes that ***“the bus market at this location is well developed for a strongly growing area and has a uniquely high level of commercial bus operations run by Swords Express that will respond quickly to any growth in demand to capture market share. The NTA’s Bus Connects proposals confirm the importance of the Glen Ellen Road as a major growth axis in Swords, itself the fastest growing town in the Dublin area. The Holybanks development will serve to consolidate residential density in the area and thereby strengthen the market for bus services. A key attraction is that the development of the site has no great reliance on the proposed Metro service for Swords. The bus network in this area, post Metro, will likely be largely retained*”**



***in its current or Bus Connects format. The current capacity in the bus network is more than capable of handling the hoped for bus modal share from the Holybanks development”.***

In accordance with SPPR 3, planning applications are also required to demonstrate that they satisfy criteria set within section 3.2 of the Guidelines, as follows:

*At the scale of the city/town:*

- The site is well served by public transport with high capacity, frequent services and good links
- Development should successfully integrate into /enhance the character and public realm of the area... setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment by a suitable qualified practitioner such as a chartered landscape architect
- On larger urban development sites, the proposed development should make a positive contribution to the place making, incorporating new streets and public spaces...

The proposed development which is well served by high frequency and high-capacity public transport, will bring to use a disused vacant site in a highly accessible location within the built fabric of Swords Metropolitan Town. The development will contribute positively to the receiving environment by way of its carefully considered and sensitive landscaping proposals, the variety of open spaces, new streets, attractive pedestrian and cycle pathways for the use of residents in the area. The scheme is well thought out and enhances the character of the area.

Detailed landscape and visual impact assessment are included as part of the EIAR for the proposed development. The assessment is conducted by Cunnane Stratton Reynolds and includes photomontages and Computer-Generated Imagery (CGIs) by Modelworks to visually articulate the impact from the proposed development. Please also refer to the Landscape Design Report by Cunnane Stratton Reynolds.

*At the scale of neighbourhood:*

- The proposal responds to its overall natural and built environment and makes a positive contribution
- The proposal is not monolithic and avoids long, uninterrupted walls of building
- The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage
- The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area
- The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood

The proposed apartments along Glen Ellan Road range in height from 1-7 storeys (Block A1 range from 5-6 storeys, Block A2 range from 5-7 storeys and Block B range from 1-7 storeys) in height providing a well-defined urban edge along the southern section of the site in accordance with the principles set out for future schemes in the non-statutory Estuary West Masterplan, May 2019. Care has been taken to introduce a variety of finishes to create a visually interesting effect to the street facing facades of the development.

The proposed scheme will successfully integrate into and enhance the character and public realm of the area, having regard to topography, cultural context, and the built form of the receiving environment. As a large urban development project, the proposed development makes a positive contribution to place-making, incorporating new streets and public spaces, using massing and height

to achieve the appropriate density but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest throughout the scheme.

*At the scale of the site:*

- The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.
- Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined

The design optimises natural daylight access to proposed dwelling units while not causing overshadowing or loss of light to any existing residential units. The scheme was assessed by IES against *Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition)*. The study carried out Shadow Analysis, Sunlight to Amenity Area, Average Daylight Factor across floor plans and Daylight Analysis of existing buildings in the neighbouring estates. The assessment concludes that the proposed development performs well when compared to the BRE recommendations.

### **3.7 The Planning System and Flood Risk Management: Guidelines for Planning Authorities (2009)**

The Planning System and Flood Risk Management: Guidelines for Planning Authorities (November 2009) provide guidance for planning authorities when preparing their statutory plans and when adjudicating on planning applications. In accordance with the Planning System and Flood Risk Management Guidelines, a Flood Risk Assessment (FRA) has been prepared by JBA Consulting Ltd to support and inform this application. The primary objective of the FRA was to work with the design team to progress a site design that can manage any potential impacts of flooding to the site. The report was prepared in accordance with Department of Housing and Local Government (DEHLG) and the Office of Public Works (OPW) document *"The Planning Process and Flood Risk Management Guidelines for Planning Authorities"*.

The FRA concludes that the main source of flooding on the site is from fluvial flooding from Broadmeadow river. The Fingal East Meath Flood Risk Assessment and Management Study (FEM FRAMS) is the most detailed mapping undertaken for this region. The FEM FRAM flood maps shows that the north eastern portion is within Flood Zone A/B and therefore has a risk to be flooded in the 1% and 0.1% AEP fluvial event. To further investigate this flooding risk, the site was subject to hydraulic modelling. The results show that the north east edge of the site along the Broadmeadow river which forms part of the Riverside park will only be affected. The key development site where the residential buildings are provided fall within Flood zone C and is not affected from fluvial flooding.

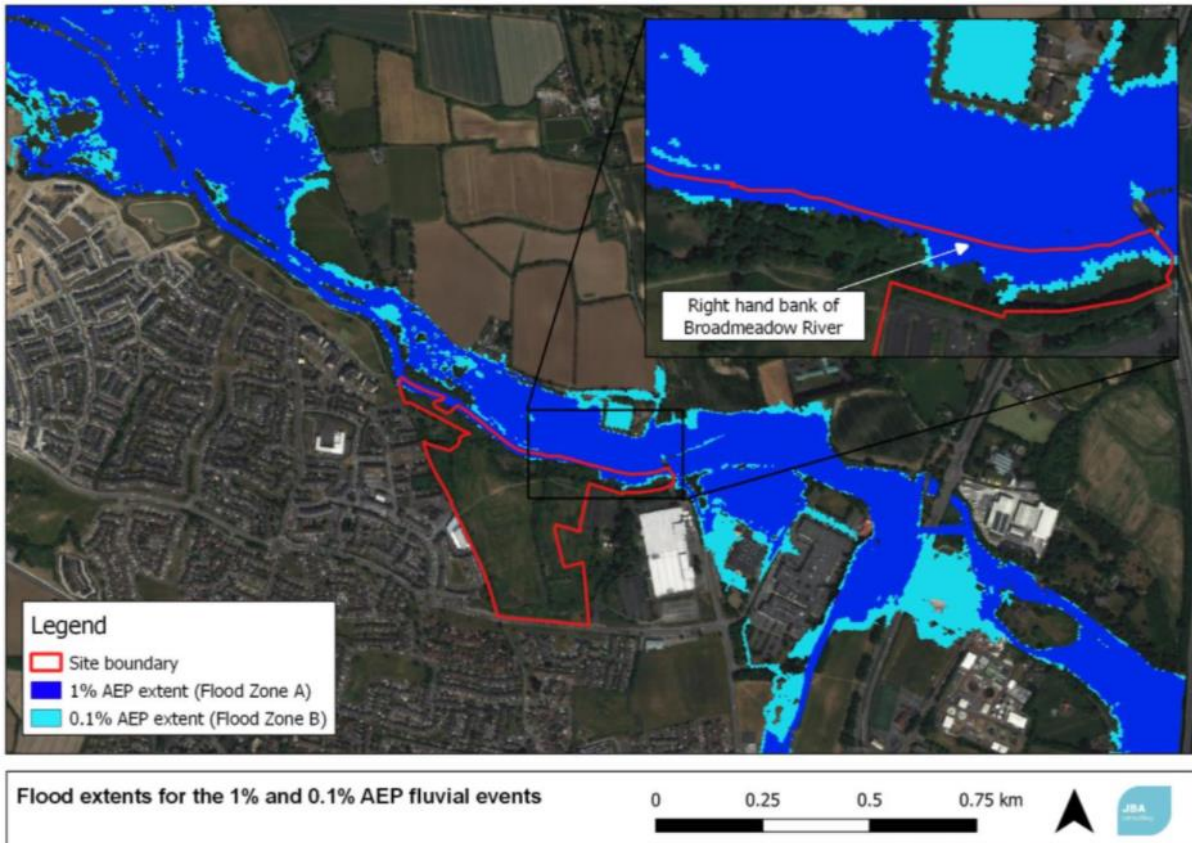


Figure 3-2 Extend of flood risk within subject site

### 3.8 Guidelines for Planning Authorities on Childcare Facilities (2001)

The Childcare Guidelines provide a framework to guide local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals. The Guidelines are intended to ensure a consistent approach throughout the country to the treatment of applications for planning permission for childcare facilities. The Guidelines identify a number of appropriate locations for childcare facilities, which include the following:

- New Communities/Large Housing Developments
- The vicinity and concentrations of workplaces, such as industrial estates, business parks and any other locations where there are significant numbers working
- In the vicinity of schools
- Neighbourhood, District and Town Centres
- Adjacent to public transport corridors, park and ride facilities, pedestrian routes and dedicated cycle ways

The recommendation for new housing developments is the provision of 1 facility for each 75 dwellings. This will generally provide for 20 childcare spaces based on a requirement of 35 of such dwellings requiring childcare spaces.

We can confirm that the current proposal provides for a crèche facility of c. 506. 5sq.m within the ground floor of Block B with a capacity of 100 spaces. This facility incorporates an outdoor, secured play area comprising 90 sq.m. It has been designed to a capacity that will accommodate the number of childcare spaces generated by the proposed development and which are likely to be taken up by families.

Based on the 621 units proposed and discounting for one-bedroom units (145 -comprising of 137 no. one bed apartments and 8 no. maisonettes) in accordance with the Apartment Guidelines, childcare space provision is required for 476 dwellings. Applying the Childcare Facilities Guideline standard of 20 places per 75 no. dwellings, the total requirement arising from the scheme has been determined as **127 places**.

However, a **deduction of 27 places has been made to bring the total capacity to 100 spaces**. The reasons and justifications for this deduction are described below

I. Discounting of 50% 2-bedroom dwellings

The development proposal incorporates 278 no. 2 bed units (comprising 77 duplexes and 201 apartments). Applying a 50% reduction rate for 2-bedroom units to the 127 children estimated as likely to require a crèche place reduces the number down to **90 children (10 spaces lower than that proposed within the SHD application)**.

II. CSO’s Quarterly National Household Survey (QNHS)

The CSO’s Quarterly National Household Survey (QNHS) provides a study specifically on childcare take-up for Q3 of 2016. It shows the types of childcare used by children by school-going status and region. The figures for the State and the Dublin Region are set out in Table 3.2.

Table 3-2 Type of Childcare utilised for pre-school children, Quarterly Household Survey Q3 of 2016.

Type of Childcare	Dublin	State
Parent/Partner	62%	62%
Unpaid relative or friend	16%	17%
Paid relative or friend	3%	3%
Childminder/Au-Pair/Nanny	8%	13%
Childcare Facility	25%	19%
Other	1%	1%

Interestingly, the vast majority of pre-school children are cared for by parents while a total of 25% of respondents in the Dublin Region stated that they use childcare facilities. The State average shows a lower figure, with approximately 19% of respondents claiming they use childcare facilities.

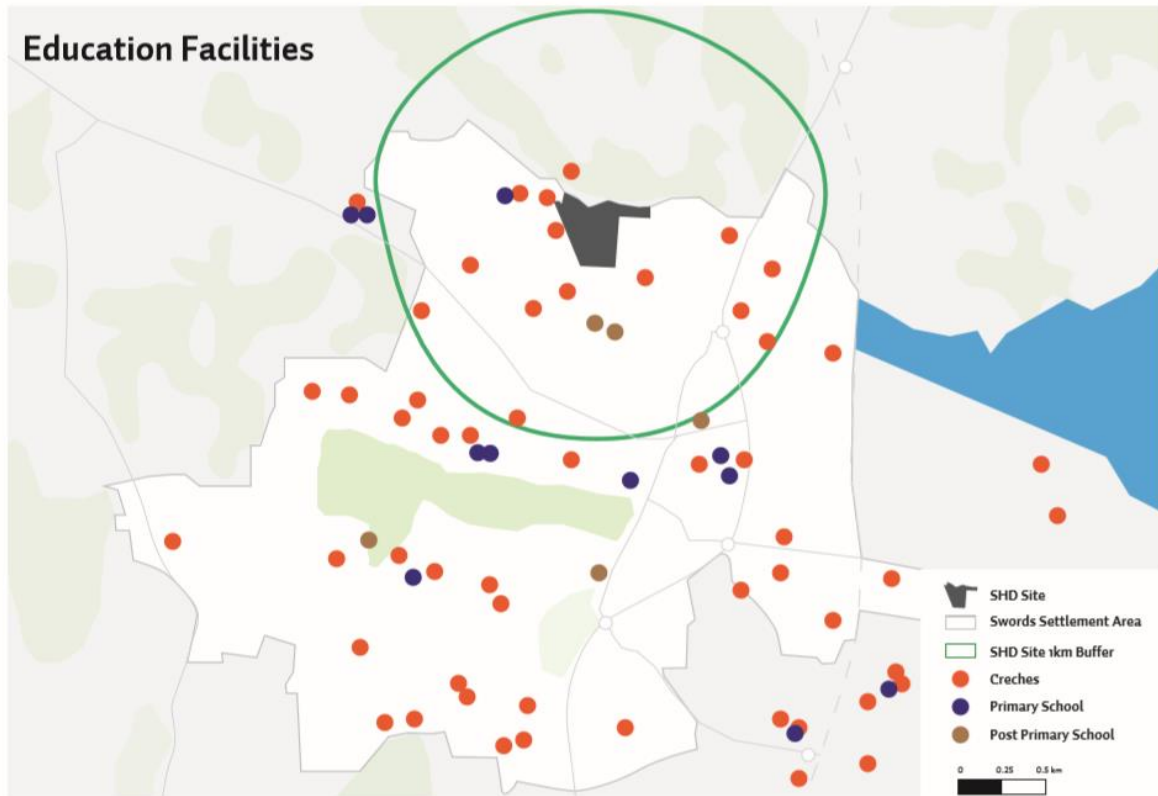
Applying the childcare facility figure for Dublin based respondents of 25% to the total number of pre-school children anticipated to reside in the proposed development (according to the Childcare Guidelines calculation set out above of 127 children), the actual demand for places is estimated as **just 32 children (68 fewer spaces than that which is proposed)**.

Applying the QHNS figures to the 90 spaces likely to be required if 100% of one-beds and 50% of two-bedroom units are discounted, the demand for spaces falls to just 23 (77 fewer spaces than that which is proposed).

III. Current Provision

A review of the existing childcare facility provision within a 1km radius of the site (undertaken in July 2020) indicates that there are 14 crèches serving this area currently. An additional 31 facilities are situated within the CSO defined Settlement Area for Swords bringing the total number of existing facilities serving the settlement of Swords to 47. As can be seen in Figure 3.4, there are also several facilities located within the nearby Kinsaley and Malahide areas.

Figure 3-3 Current Provision of Childcare Facilities within 1km of site (green boundary) and within the settlement of Swords (



#### IV. Commercial Viability

In terms of commercial viability (pre-COVID), the experience of Cairn Homes Properties Ltd., has been that facilities offering spaces for 100 children or in the region thereof, tends to be the preference of childcare operators. A review of existing facilities within the county from the Early Years Sector Profile for the year 2018/19 shows that the average enrolment in facilities is 42 children.

According to figures released by the Federation of Early Childhood Providers in mid-2020, an estimated 2,600 children across the country were left without a day care or preschool place after the closure of 56 childcare facilities. A survey by the Federation found that fewer than one in three creches reopened following the first lockdown period in 2020. The poll of 868 preschool and daycare operators saw 79 per cent say they fear for the survival of their business – with the federation saying it is worried about the "total implosion" of the sector without more financial backing from the State. With high operational and insurance costs and low pay for workers already among the significant concerns highlighted by the sector prior to the Covid-19 pandemic, the burden of additional operational costs associated with the safe reopening of facilities (PPE, structural changes to allow for Pod systems etc.) and reduced attendance levels, greatly added to the viability concerns for crèche owners.

The findings contained in the Early Years Staffing Survey Report<sup>1</sup> for 2021 show that closures remain a common occurrence within the sector –a third of childcare managers say their facility could face closure in the coming months due to an inability to recruit qualified workers. This recently published research also reveals that 61% of managers think their facility may have to reduce capacity due to staff shortages.

<sup>1</sup> Early Years Staffing Survey (2021) Published by the New Deal for Early Years Coalition

In proposing the c. 506.5 sq.m facility, the applicants have been guided by the evidenced based approach documented above. This approach aligns with the provisions of the Childcare Guidelines and also has regard to a combination of factors that will influence demand for spaces – i.e. the no. of 1 and 2 bed units proposed; the QHNS findings on demand for childcare spaces; the current provision within the vicinity of the site; the impact of external factors such as COVID-19 on commercial viability; and the ordinary preferences of childcare operators for crèches catering for in the region of 100 children. Considering the above factors, the size and capacity of the facility proposed is considered to be more than sufficient to respond to the childcare needs of residents of the scheme, as the summary set out in Table 3.3 shows.

Table 3-3 Summary overview of evidence-based approach to determining capacity of proposed crèche

	Proposed no. of spaces provided	Required as per Childcare Guidelines*	Factors justifying reduced provision (scenarios provided to demonstrate rationale for minor reduction proposed)			
			50% of 2 bed units excluded	QHNS	Current Provision	Commercial Viability
No. of Spaces	100	127	90	32	n/a	n/a

\* 100% of 1-bedroom units discounted from calculation

We submit to the Bord that the current proposal is therefore in compliance with the key objectives of the Guidelines for Planning Authorities on Childcare Facilities (2001) as amended by the Apartment Guidelines of 2018.

### 3.9 Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009)

Screening for Appropriate Assessment and Natura Impact Assessment has been undertaken by Openfield Ecological Services for the proposed development in accordance with Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009). These reports forms part of the application documentation.

**Response:** The site is not located within or adjacent to any Natura 2000 (SAC or SPA) sites. However, the site abuts existing river corridor (Broadmeadow River) along the northern site boundary which acts as a direct hydrological pathway from the site to two Natura 2000 sites: Malahide Estuary SAC (site code: 0205) and SPA (site code: 4025). If left unmonitored the development works can result in large quantities of sediment in the Estuary. It was therefore considered that a full AA is required to guide the proposed development.

The NIS prepared by Openfield includes mitigation measures to prevent pollution during the construction phase of the proposed development. The report contains an analysis of the proposed project and its relationship with the Malahide Estuary SAC and SPA.

The NIS concludes that pathways exist between the development site and Malahide Estuary SAC and SPA. However, following analysis set out in the NIS, it is concluded that based on best scientific knowledge the project, alone or in combination with other plans and projects, would not adversely affect the integrity of the Malahide Estuary SPA and SAC, in light of their specific conservation objectives.

The construction phase will follow guidance of Inland Fisheries Ireland. Water leaving the site will be filtered to remove silt through silt traps and settlement ponds. Oils, fuels and other dangerous substances will be stored within specific bunded areas only. Most importantly all site personnel will be trained on the pollution prevention measures. Further measures for pollution prevention including sediment control are set out within the Construction and Environment Management Plan prepared by Waterman Moylan.

### **3.10 Part V of the Planning and Development Act 2000: Guidelines (2017) and Affordable Housing Act (2021), as amended**

The Guidance for Part V of the Planning and Development Act 2000 highlights the importance of early engagement between the developer and the Housing Department within a Local Authority to consider the efficient delivery of appropriately located Part V units on the site. The consideration of which units are most appropriate to fulfil this requirement will be informed by the Local Authority's Housing Strategy.

Recently enacted Affordable Housing Act, 2021, amends section 94 of the Planning and Development Act 2000, to increase Part V contributions from 10% to 20%. Transition arrangements allow 10% Part V contributions where the lands were purchased between 01st September 2015 and 31st July 2021 to all permissions granted until 31st July 2026. Lands purchased prior to 01st September 2015 and permissions granted after 31st July 2026 would be required to contribute 20% as Part V.

**Response:** Part V documentation is included with this application. Subject site qualifies for the transition arrangements which makes the site eligible for 10% Part V contributions. The applicant has engaged with Fingal Housing Dept in this regard and has agreed for the transfer of 62 no. units. A letter confirming an agreement in principle from the County is also included within the documentation of this application as Appendix 6 to Planning Report prepared by KPMG Future Analytics.

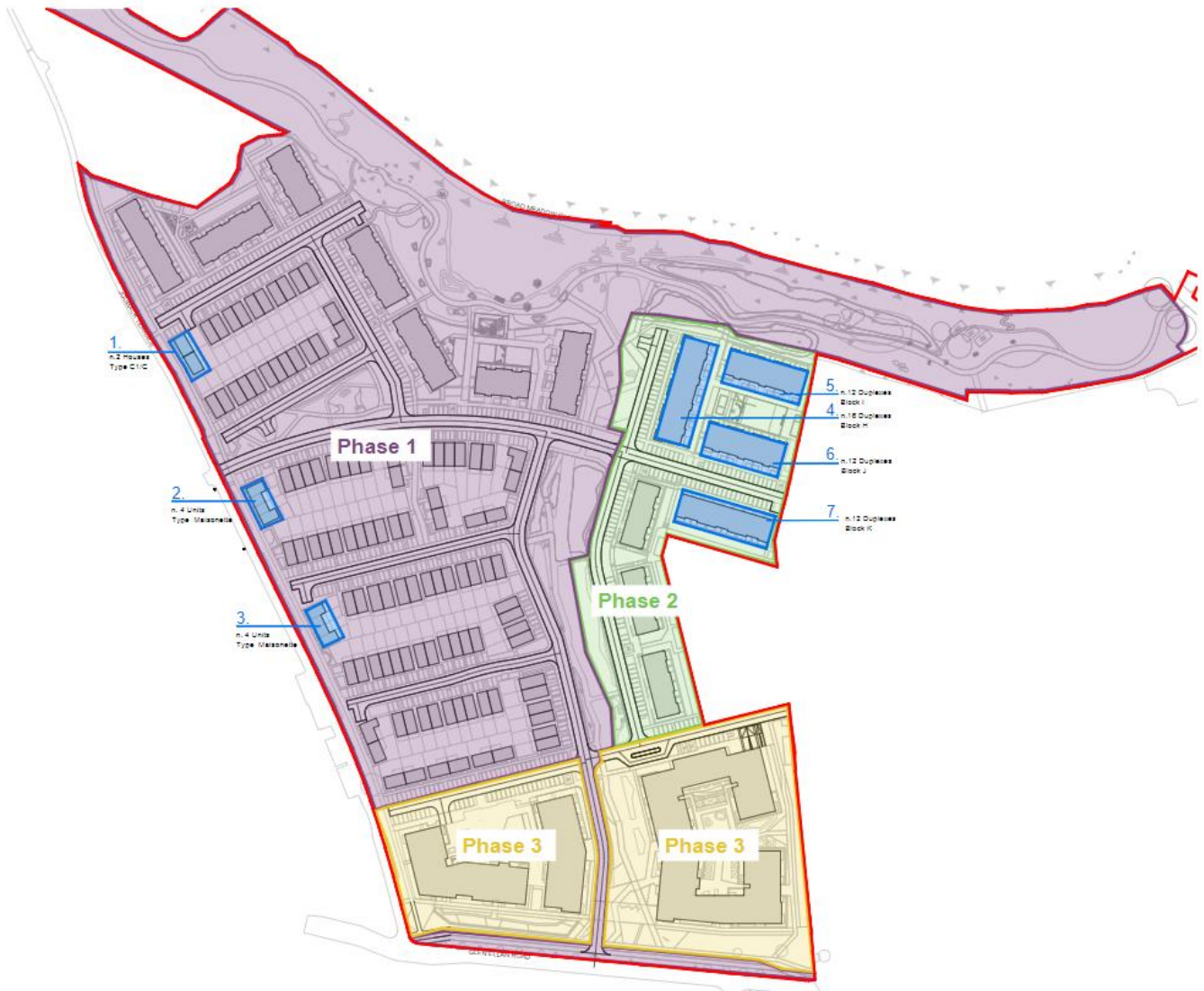


Figure 3-4 Location of Part V units suggested within scheme (MCORM Part V Provision Site Plan drawing)

### 3.11 Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment, 2018

The guidelines are issued under section 28 of the Planning and Development Act 2000 as amended in August 2018. The purpose of the guidelines is to provide guidance on legal and procedural issues in the interpretation of the amended EIA directive(2014/52/EU) so as to result in greater consistency in procedures adopted by different competent authorities.

Projects are screened to determine whether an EIA is necessary. The Screening is carried out as per a case-by-case examination or by the thresholds set by the relevant Member State’s Competent Authority. Mandatory legislative threshold requirements take into account the type and scale of the proposed development, and the sensitivity of the receiving environment. Schedule 5 (Part 2) of the Planning & Development Regulations 2001 (as amended) set mandatory thresholds for each project class.

Class 10(b) (i) and (iv) addresses ‘Infrastructure Projects’ and requires that the following class of project be subject to EIA:



*(b) (i) Construction of more than 500 dwelling units.*

Furthermore, Category 10(b)(iv) refers to:

*‘Urban development which would involve an area greater than 2 hectares in the case of business district, 10hectares in the case of other parts of a built-up area and 20 hectares elsewhere.’*

The requirement for an Environmental Impact Assessment Report was subject to informal screening with Fingal County Council over the course of the pre-planning consultation. It was determined that it was mandatory to carry out an Environmental Impact Assessment for the proposed development with respect to the relevant thresholds, with particular reference to urban development exceeding *‘10 hectares in the case of other parts of a built-up area’* and *the potential impacts on the receiving environment’* and with respect to the *‘Construction of more than 500 dwelling units’*.

The application is therefore supplemented by an Environmental Impact Assessment Report that has been prepared by competent experts and specialist in the respective domains as required by the guidelines. The accompanying EIAR has been prepared by Future Analytics Consulting (FAC) and various specialist sub-consultants on behalf of Cairn Homes Properties Ltd.

## 4.0 Fingal County Development Plan 2017-2023

### 4.1 Land Use Zoning

The Fingal County Development Plan 2017 – 2023 came into effect on 21<sup>st</sup> October 2016 and is the statutory land-use plan governing the subject site. The core strategy of the current County Development Plan designates Swords as a Metropolitan Consolidation Town that aims to be a strong active urban place with strong transport links. The housing strategy of the Council assigns a total capacity for 15,828 no. new dwelling units within the zoned land bank of Swords. This includes the lands designated within the Estuary West lands in which the subject site is located.

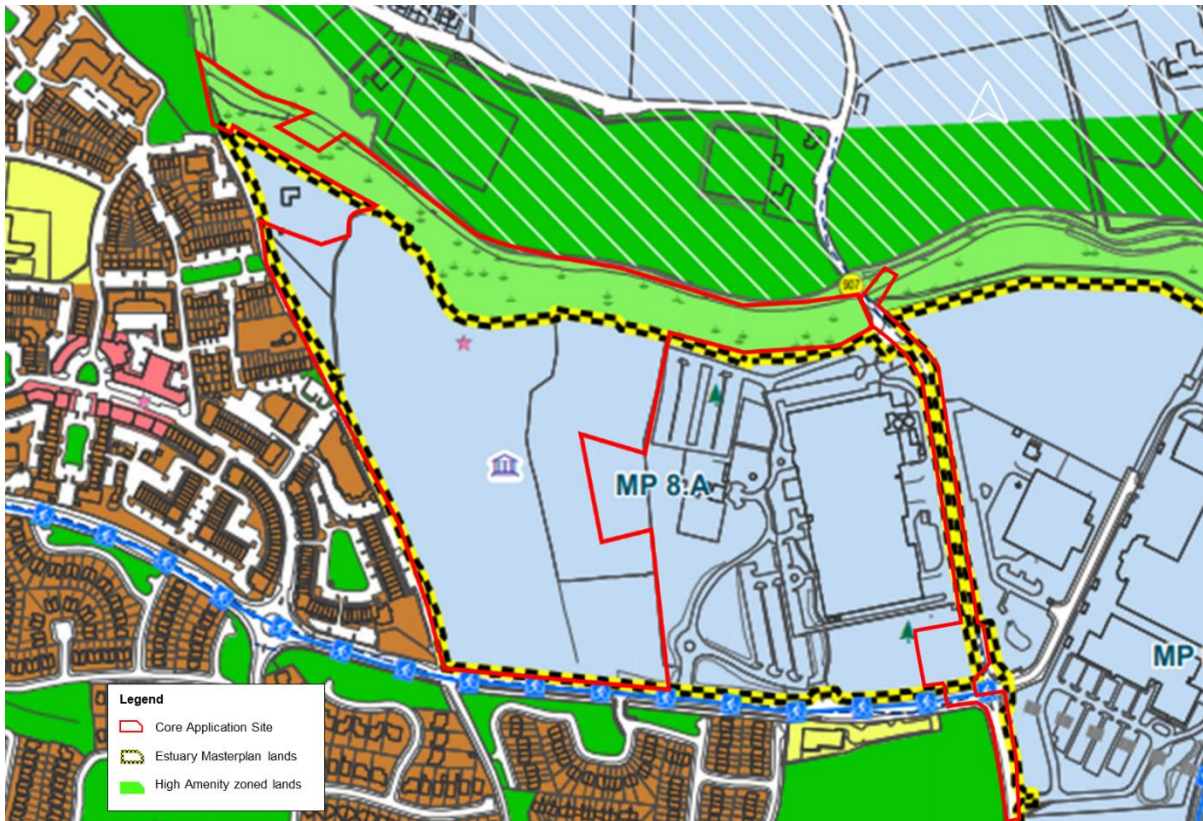


Figure 4-1 Location of Estuary West Lands within the Fingal County Development Plan 2017-2023 zoning maps.

The majority of the subject site is zoned as Objective ME – Metro Economic Corridor under the Fingal Development Plan 2017-2023. ME zoning is a specific zoning created to **facilitate high-density mixed-use employment and residential development** along the proposed Metro Link route. The ME zoning provides for an area of compact, high intensity/density, employment generating activity within the Metro Economic Corridor. It is envisaged that Metrolink will provide a high capacity, high frequency and first-class public transport link between Dublin City, Dublin Airport and Swords. A portion of the northern section of the site is located within lands zoned Objective HA – High Amenity.

The **Metro Economic Corridor (ME)** zoning objective is intended 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”.*

Underpinning this objective is the vision for the lands to:

*“Provide for an area of compact, high intensity/density, employment generating activity with associated commercial and residential development which focuses on the Metro within a setting of exemplary urban design, public realm streets and places, which are permeable, secure and within a high-quality green landscape. Landmark buildings will provide strong quality architectural features, which respect and enhance the character of the area into which they sit. The designated areas will form sustainable districts which possess a high degree of connectivity and accessibility and will be developed in a phased manner subject to the necessary provision of social and physical infrastructure.”*

**Response:** Residential development is identified as being ‘permitted in principle’ within zoning Objective ME. The proposal, which will provide for an additional 621 no. residential units located in close proximity to excellent public transport infrastructure is considered to fully accord with the overarching objective of the zoning designation. Other uses proposed ancillary to the residential use within the scheme include a childcare service, residential amenity facilities (residents’ gym, concierge, meeting room and multipurpose room), open space, and essential utility installations include the proposed upgrades to Irish Water infrastructure network, namely the stormwater storage tank and pipeline. Childcare, residential amenity facilities (recreation), open space and utility installations are also listed as ‘permitted in principle’ uses for ME lands. The proposed stormwater storage tank falls within the ME designation located within the MP 8.A lands with the outfall overflow pipeline also falling mostly on ME lands with the outfall point to Broadmeadow River within the High Amenity (HA) land designation. The road upgrade works proposed take place on lands running through and directly adjoining the ME designation.

This proposal will bring a strategically located underutilised urban site into a positive and beneficial use. The proposed scheme has been carefully planned and designed to respond appropriately and sensitively to the urban and natural elements within the surrounding environment. In addition, the proposal provides for the extension to the Broadmeadow Riverside Park between Jugback Lane and Balheary Road in conjunction with the first phase of the development of the Estuary West lands. The proposal also includes dedicated cycle and walking routes along the park that will provide direct access to the proposed Metro Stop to the east. By opening up accessibility, the ambitions for the Broadmeadow riverside park set out in local planning policy, will be largely enabled through delivery of this public park on the ‘HA - High Amenity’ zoned lands to the north of the site, thus bringing a notable community gain to the area.

The development plan sets out objectives for development within the designated Metro Economic Corridor as follows:

**Objective ED99:** *Protect the integrity of the Metro Economic Corridors from inappropriate forms of development and optimise development potential in a sustainable and phased manner.*

**Objective ED100:** *Ensure high quality urban design incorporating exemplary public spaces, contemporary architecture and sustainable places within a green landscape setting.*

**Objective HA** – High Amenity applies to the most northern portion of the site which adjoins the Broad Meadow River. The objective of HA zoning is to: *“Protect and enhance high amenity areas.”*

As outlined in the Fingal Development Plan, the vision of this zoning objective is to protect these highly sensitive and scenic locations from inappropriate development and reinforce their character, distinctiveness, and sense of place. In recognition of the amenity potential of these areas,

opportunities to increase public access will be explored. The Fingal Development Plan sets out the following objectives for High Amenity zoned land:

**Objective NH51:** *Protect High Amenity areas from inappropriate development and reinforce their character, distinctiveness and sense of place.*

**Objective NH52:** *Ensure that development reflects and reinforces the distinctiveness and sense of place of High Amenity Areas, including the retention of important features or characteristics, taking into account the various elements which contribute to its distinctiveness such as geology and landform, habitats, scenic quality, settlement pattern, historic heritage, local vernacular heritage, land-use and tranquillity.*

**Response:** The use of the HA zoned lands to the north of the subject landholdings will be retained as communal amenity space contributing to the public open space provision. Open space and recreational use fully align with the intent of the HA zoning designation. The landscape proposals for the development has allocated HA zoned lands to be developed into a linear park and amenity space area measuring 29,400sq.m. adjacent the Broad Meadow River, as an extension to the existing Broadmeadow riverside park. The Broadmeadow riverside park lands is primarily in the ownership of Cairn Homes Properties Ltd. A portion of the Broadmeadow riverside park lands to the northwest are within the ownership of Fingal County Council. Approval has been received to include this within the application lands, please refer to Appendix 4 for Letter of Consent from Fingal County Council.

The proposal also includes dedicated cycle and walking routes along the park that will provide direct access to the proposed Metro Stop to the east. By opening up accessibility, the ambitions for the Broadmeadow riverside park set out in local planning policy, will be largely enabled through delivery of this public park on the 'HA - High Amenity' zoned lands to the north of the site, thus bringing a notable community gain to the area.

The site is the subject of a specific local objective for the reservation of an individual site for a school under the current County Development and Plan 2017-23

**Objective PM78:** *Reserve individual sites for primary and secondary schools in consultation with the Department of Education and Skills, based on current population using the most up to date statistical data, anticipated additional growth based on residentially zoned land, taking into consideration the timelines of planning and constructing new school places, and in line with access to public transport.*

**Response:** A 0.46ha site has been reserved on an adjacent site to the immediate east to facilitate a future school. We refer to Appendix 3 of the planning report which includes the submission prepared by the Department of Education and Skills, demonstrating their support for the inclusion of a school site. The proposed 0.46ha site is sufficient to cater for the required 16-24 room primary school and meets the requirements of the masterplan in this regard. The school reservation site does not form part of this SHD application.

## 4.2 Development Management Standards

This section describes how the proposed development aligns with relevant standards and provisions of the Development Management Standards set out in Chapter 12 of the County Development Plan.

### 4.2.1 Housing Mix

Objective PM40 of the current County Development Plan sets out the Council’s intention to ensure that a mix and range of housing types are provided in all residential areas to meet the diverse needs of residents.

*‘Ensure a mix and range of housing types are provided in all residential areas to meet the diverse needs of residents.’*

**Response:** The proposed 621 no. unit SHD provides a balanced unit mix appropriate to the surrounding context and wider Sword’s area. The proposed mix comprise of 145 no. 1 bed units (23%), 278 no. 2 bed units (45%), 187 no. 3 bed units (30%) and 11 no. 4 bed units (2%). The mixture of typologies contained within the scheme provide a variety in housing choice to meet a diverse range housing need. Furthermore, the residential units are designed to be easily adaptable in the future to meet changing household requirements.

### 4.2.2 Density

A key objective of the National Planning Framework is greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development. On residential density, the County Development Plan states that:

*‘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.’*

**Objective PM41** of the plan is intended to: *‘Encourage increased densities at appropriate locations whilst ensuring that the quality of place, residential accommodation and amenities for either existing or future residents are not compromised.’*

The Development Plan, which does not specify density standards for residential developments, directs developers to the Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities’ (2009) which state:

*‘In general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors...’*

The Swords Masterplan for Estuary West – Part D (May 2019) refers to a net density of 70-75 ha.

**Response:** The proposed scheme achieves a net density of c.70 units per hectare. As set out above, higher densities are promoted within the Fingal County Development Plan 2017-23 on sites located within walking distance of town and district centres and high-capacity public transport facilities. The subject site is strategically located on the edge of the built footprint of Swords, benefitting from a wealth of facilities and services at its doorstep and within walking distance of high frequency public transport corridors such as Busconnects, within an area that is particularly well served by high-capacity commercial bus operators, and within close proximity to the proposed Metrolink Estuary station. The density proposed is considered appropriate for the current site conditions and the available infrastructure to the support the development.

#### 4.2.3 Residential Unit Sizes

**Objective DMS24** of the current County Development Plan requires that new residential units comply with or exceed the minimum standards set out in Tables 12.1 (Houses), 12.2 (Apartments and Duplexes) and 12.3 (Minimum Room sizes and widths for Houses and Apartments).

**Response:** The residential units comply with the standards set out in the Section 28 Ministerial Guidelines – Design Standards for New Apartments, 2018. We refer the Board to the Housing Quality Assessment prepared by McCrossan O’Rourke Manning Architects, which sets out in detail adherence with the standards for unit sizes.

#### 4.2.4 Internal Storage

All new residential units proposed comply with or exceed minimum standards for internal storage in houses and apartments are set out in Section 12.4 (Table 12.1 for Houses and table 12.2 for Apartment and Duplexes) of the current County Development Plan.

A minimum of 3 sqm storage has been provided for in 1-bed units, similarly a minimum of 6 sqm storage for 2-bed units and a min of 9 sqm is provided for 3-bed units consistent with the requirements of Development Management Standards. Storage facilities provided in the scheme consist of dedicated utility rooms, storerooms within the units.

It is specified in the development plan that no individual storage room within apartment/duplex should exceed 3.5sqm. In the duplex units, there is a very marginal increase no greater than 4sqm for a total of 77 of the 154 units proposed (50%). For the apartments, there are marginal exceedances of maximum up to 4.2sq/m (with some measuring just 3.6 sqm) in 95 of the 349 units (27%).

Please refer to the Housing Quality Assessment prepared by McCrossan Manning O’Rourke Architects, which sets out in detail, the schemes compliance with the applicable standards. Please also refer to the Material Contravention Statement for further information on these minor exceedances which are immaterial in nature.

#### 4.2.5 Overlooking / Overshadowing

Objective DMS28 current County Development Plan requires a minimum standard of 22 metres between directly opposing rear first floor windows.

***Objective DMS28** A separation distance of a minimum of 22 metres between directly opposing rear first floor windows shall generally be observed unless alternative provision has been designed to ensure privacy. In residential developments over 3 storeys, minimum separation distances shall be increased in instances where overlooking or overshadowing occurs.*

All separation distance is in accordance with the standards set out in the current County Development Plan. The landscaping measures along the southern and western site boundaries ensure that there is adequate foliage in addition to separation distance to prevent overlooking. The scheme has been skilfully designed to minimise overlooking of adjoining properties arising from the scheme and the privacy and amenities of these adjoining properties will be protected as a result.

All new buildings are proposed at ample separation distance to ensure adequate level of privacy to adjoining dwelling units. All proposed building heights respect and reflect the existing site context. The design of the scheme has given ample consideration to separation distance between living areas ensuring a distance of above 22m between adjoining properties within and along the periphery of the

site. In addition, units within the scheme are designed to prevent sound transmission by appropriate acoustic insulation.

Objective DMS29 seeks to ensure that a minimum distance of a least 2.3m is provided between side walls of detached units. We refer the Board to the Site Context Elevations and Sections, prepared by McCrossan O'Rourke Manning Architects which shows that separation distances between proposed units are in alignment with the standard.

Care has been given to ensure that rear garden depths of individual houses meet or exceed 11m so as not to prejudice the development potential of neighbouring sites. Houses are also designed with formal planting and on curtilage parking areas to the front of dwellings that prevent overlooking between bedrooms oriented to the front of the house. Upper floor level windows of individual houses will also be equipped with obscured glazing to enhance privacy between units.

The design for the scheme has given due consideration to the interaction between proposed and existing dwellings along Jugback Lane/Terrace, ensuring sensitive frontage here through appropriate heights and landscape buffer. 1-bedroom Maisonette's units has been proposed along Jugback Lane/Terrace to respect existing site context. At the narrowest point along Jugback Terrace, units fronting Thornleigh Terrace have a separation distance of 13.7m between front facades. Privacy to these units will be further enhanced through landscaping measures that integrates existing and proposed vegetation to ensure ample screening to these units.



Figure 4-2 CGI image showing proposed development along Jugback Terrace prepared by Modelworks

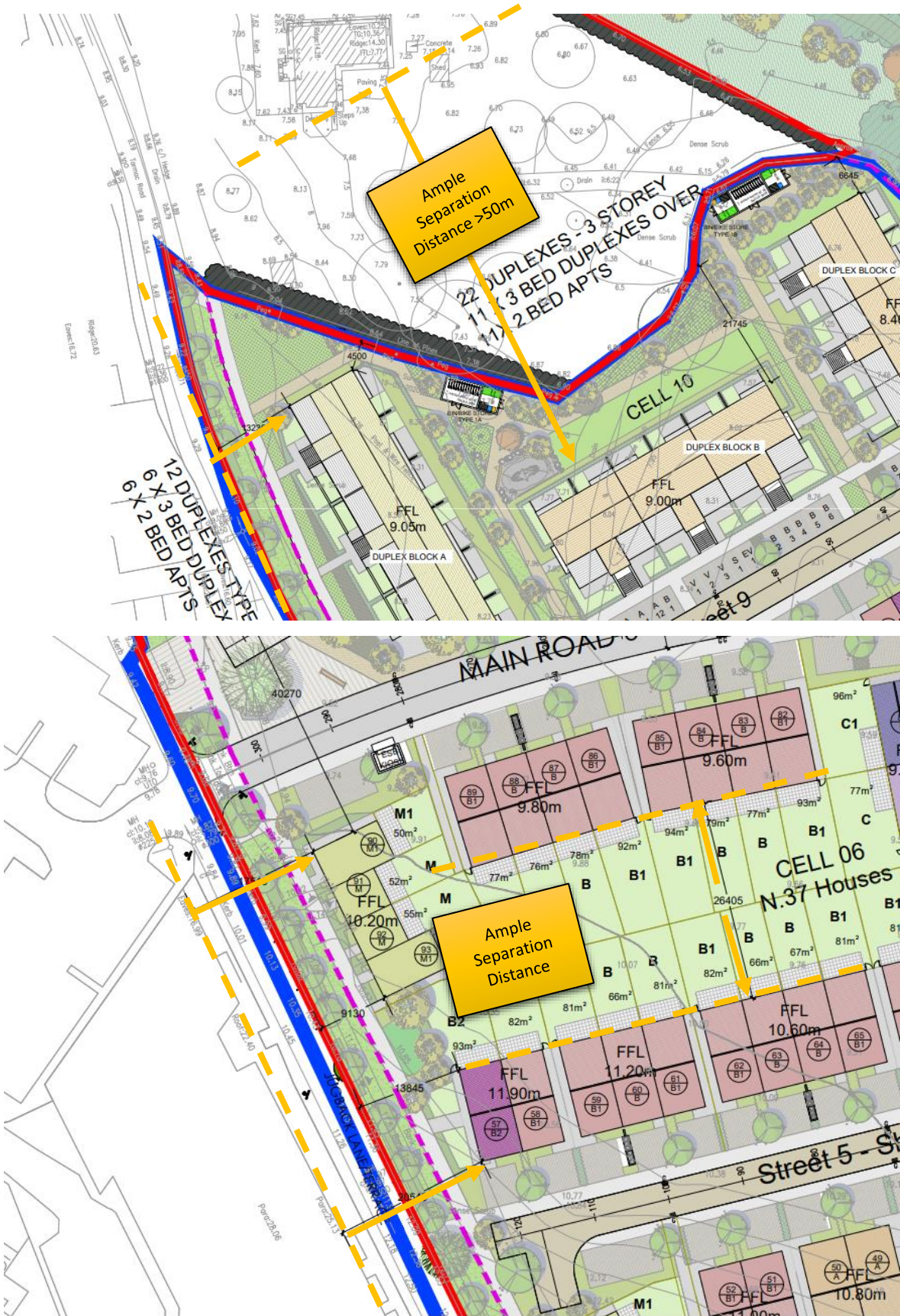


Figure 4-3 Excerpt from Site Layout Plan showing sections along Jugback road- prepared by McCrossan O'Rourke Manning Architects (Dwg N0 PLO5a Site Plan Layout Sheet 1 in 6)



The site slopes gently towards the north, falling towards Broadmeadow River. The 3 storey Duplexes units proposed to the north of the site utilises this drop in the terrain to reduce overbearance on existing structures. Duplex units proposed to the north east corner of the site and overlooking existing private residence has been screened off by substantial set back distance and existing dense vegetation. In addition, the proposed landscaping measures also include significant foliage and new tree planting to provide additional screening to the proposed dwelling units.

Apartment blocks proposed along Glen Ellan Road is set back by 25m to incorporate existing public wayleave area here. This provides a soft buffer to apartment blocks proposed here. The form and massing of these blocks ensure strong urban context along Glen Ellan road in line with the urban design principles set for these landbanks within the Estuary West Masterplan. Building heights drop to 5 storeys at the south west corner respecting existing low-density site context along Jugback Terrace.

An assessment of overshadowing or daylight loss to existing buildings in the neighbourhood has been carried out via consideration of Vertical Sky Component within the Daylight, Sunlight and Overshadowing Study by IES. The results show that the proposed design does not restrict daylight access to any of existing or future residents of the scheme.

3.2.1 MASTERPLAN STRATEGY



Figure 4-4 Masterplan Strategy— extract from Urban and Architectural Design Statement

**4.2.6 Private Open Space and Communal Open Space**

Objective DMS87 of the current County Development Plan sets out the minimum private open space provision for houses. A minimum open space provision for dwelling houses (exclusive of car parking area) is set out as follows:

- 3-bedroom houses or less to have a minimum of 60 sqm of private open space located behind the front building line of the house;
- Houses with 4 or more bedrooms to have a minimum of 75 sqm of private open space located behind the front building line of the house.

We refer the Board to the Housing Quality Assessment, prepared by McCrossan O'Rourke Manning Architects showing garden sizes for all houses. The garden sizes proposed comply with the requirements set out in the Development Plan.

Open space associated with apartments is important to ensure a suitable level of amenity for occupiers. Balconies and terraced areas are the primary form of private open space for apartment type schemes. The required quantum of private amenity and communal amenity spaces is set out in Figure 4.5.

	Private amenity space	Communal amenity space
Studio	4 sqm	4 sqm
One bed	5 sqm	5 sqm
Two bed	7 sqm	7 sqm
Three bed	9 sqm	9 sqm

Figure 4-5 Minimum private and communal amenity space for apartments, Fingal County Council Development Plan 2017-23

All apartment units within the scheme are provided with a higher standard of private amenity space ranging from 5sqm to a maximum of 15 sqm. A total communal open space 8,541 sq.m is provided within the scheme to supplement the private open space associated with each unit.

We refer the Board to the Housing Quality Assessment prepared by McCrossan O'Rourke Manning Architects, which sets out in detail adherence with the standards private open space for the apartments proposed.

#### 4.2.7 Public Open Space

Under Objective DSM57A of Fingal County Development Plan 2017-2023, a minimum of 10% of site area is required for use as public open space in residential developments. In accordance with this, an area of 11% (1 ha) within the net area of the site (8.92ha) has been reserved for public open space (POS).

Table 4-1 Public Open Space Provision

POS A	c.1904 sq.m
POS B	c.4634 sq.m
POS C	c. 1795 sq.m
POS D	c. 1675 sq.m
<b>Total Public Open Space</b>	<b>c.10,008sqm / 1ha</b>

Applying the method set out under Objective DMS57 of the Fingal County Development Plan 2017-2023 (public open space provision 2.5 per 1000 pop) to the subject proposals (as set out in Table 4.2), the POS requirement for this application is 3.4 ha.

Table 4-2 Total Public Open Space Requirement for the Scheme

	Units Total	Bed spaces Total
<b>3+ Bedroom Units</b>	198	693
<b>1- and 2-Bedroom Units</b>	423	634.5

<b>Total:</b>	621	1327.5*
<b>The requirement for this application: (Based on 2.5 hectares per 1000 people)</b>		3.31 ha (1.357* 2.5= 3.4 ha)
<b>Overall site area (net)</b>	hectares	8.92 ha
<b>10% of site area is required on site to be open space</b>	hectares	0.89ha

\*\* For the purposes of this requirement, public open space were calculated based on an agreed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedroom as per objective DMS57 of Fingal CDP 2017

As set out in Objective DMS57A, once the minimum 10% public open space standard has been complied with, the council has discretion for the remaining open space required under Table 12.5 to allow provision or upgrade of small parks, local parks and urban neighbourhood parks and/or recreational/amenity facilities outside the development site area, subject to the open space or facilities meeting the open space ‘accessibility from homes’ standards for each public open space type specified in Table 12.5. With the addition of the Broadmeadow Riverside park which comprises 2.94ha of land, the total open space delivered is 3.93 ha, far in excess of the minimum requirement of 3.4 ha for the scheme. The Broadmeadow Riverside park will provide a large amenity area for residents and wider members of the public, presenting a significant planning gain to the neighbouring community and greatly enhancing the quality and provision of public open space accessible to residents.

***Objective DMS56** Integrate and provide links through adjoining open spaces to create permeable and accessible areas, subject to Screening for Appropriate Assessment and consultation, including the public, as necessary.*

The proposed layout promotes interconnected open areas within the scheme through reinforcing and integrating the existing green infrastructure on site so as to provide meaningful connections that promote permeability within the proposed urban fabric. The existing central hedgerow has been a key factor in the design of the overall scheme. The green spine serves as a gateway to the next significant space in the scheme- the Broadmeadow Riverside Park along the northern boundary of site. This new park will unlock the significant amenity for the existing and future residents of the locality enabling safe and segregated pedestrian east to west connectivity with the proposed Metrolink Station. Pedestrian and cycle permeability is prioritised throughout the scheme while only providing necessary vehicular design as per the DMURS standard.

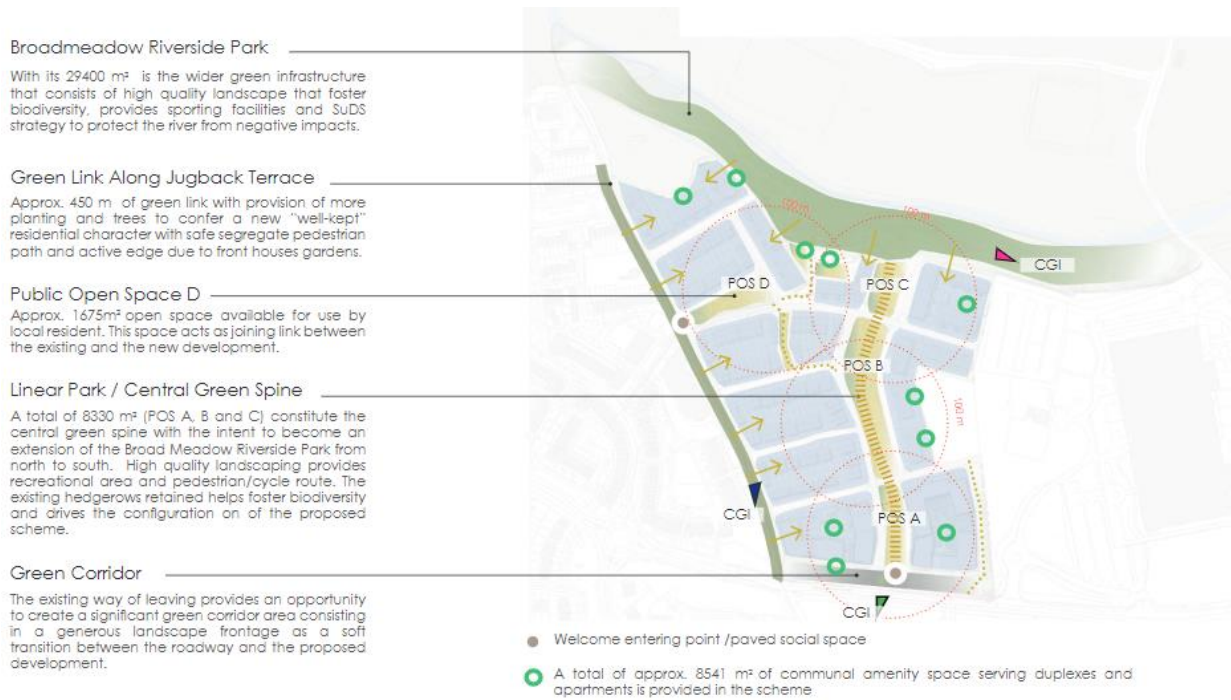


Figure 4-6 Open Space Provision (Source MCORM Urban and Architectural Design Statement)

### 4.3 Parking

#### Car Parking

Fingal County Development Plan car parking standards are split into two Zones. Subject site falls within Zone 1 as the site is within 800m of existing Quality Bus Corridor or high-quality bus corridor and in future within 1600m of proposed Metro link. Table 12.8 of the current Fingal County Development plan sets out the car parking standards for new developments. Section 12.10 of the development plan also requires all developments to include:

- One space or more per 100 spaces should be reserved for disabled parking bays.*
- One space or more per 100 spaces should be reserved for electric vehicles with charging facilities*

Table 12.8 - Car Parking Standards

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
Pre-school facilities / creche	Classroom	0.5		Education	Maximum

Figure 4-7 Minimum car parking standards, Fingal County Council Development Plan 2017-23

Based on Fingal County Council car parking requirements as represented above, this development would require 1,062 no. car parking spaces. However, as per the Design Standards for New Apartments, Guidelines for Planning Authorities, March 2020, this development meets multiple criteria for reasonable grounds to minimise car parking provision for apartments. The proposed development is well located in terms of public transport and proximity to employment and amenities.

#### *Overall provision*

A total of 705 no. parking spaces comprising 155 no. at basement level and 58 no. at under-croft level are proposed to serve the development resulting in a 1.13 parking ratio provision.

#### *Housing Units*

At 228 no. spaces (220 no. houses and 8 no. maisonette), car parking provision for the housing units is in alignment with the standards set out in Table 12.8 of the County Development Plan Car which require 1-2 spaces one- and two-bedroom homes and 2 spaces for homes with 3 or more bedrooms.

#### *Crèche*

A total of 4 no. spaces with designated drop off areas are proposed for the crèche facility.

#### *Apartments and Duplexes*

(Please refer to Section 3.2.5 above, as summarised below)

Parking provision for apartment and duplex units is 473 spaces amounting to a parking ratio of 0.94. This includes 32 no. visitor spaces, 5 no. car sharing spaces, 14 no. accessible spaces, and 12 no. EV spaces. Of the total car parking spaces provided in the scheme, 155 no. spaces are provided at basement level and 58 no. are provided at under-croft level. Research has shown that each car share vehicle can reduce the number of vehicles on the road by 8-14 vehicles.

The total parking spaces required for Apartment units in the scheme as per the parking requirements set within Fingal Development Plan is 503 no. spaces. However, as per the Section 28 Guidelines - *Design Standards for New Apartments, Guidelines for Planning Authorities*, March 2018, this development meets multiple criteria for reasonable grounds to minimise car parking provision for the apartments, given the sites proximity to high frequency public transport, and higher pedestrian/ cyclist provisions. As set out in the Material Contravention Statement this reduced parking rate is allowable under Section 37(2)(b) of the Planning and Development Act, 2000, as amended states:

*iii) permission for the proposed development should be granted having regard to regional planning guidelines for the area, guidelines under section 28, policy directives under section 29, the statutory obligations of any local authority in the area, and any relevant policy of the Government, the Minister or any Minister of the Government.*

The reduced parking provision within the scheme is also in alignment with the Movement and Infrastructure objective MT04.

*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*

While acknowledging the non-statutory nature of the Masterplan, it is noteworthy that the Estuary West Masterplan, Part D calls for a reduced parking rate:

*Within areas highly accessible to public transport (800m to a QBC or high-quality bus service, or 1600m to an existing or planned Luas/DART/Metro/Rail station), the Fingal Development Plan seeks to encourage a mode shift in favour of public transport, by reducing the maximum car parking standard by 50%.*

Further discussion on parking provision is provided within the Transportation assessment and Mobility Management Plan by Waterman Moylan consultants.

**Bicycle Parking**

Bicycle Parking Standards set out in Table 12.9 of the current County Development Plan sets out that 1 no. bicycle space is required per residential unit and an additional 1 no. visitor space per 5 no. residential unit (apartment, townhouses). This will require a total number of 604 spaces for apartment and duplex units in the scheme (503 units). The scheme provides 848 bike parking spaces (excluding 8 reserved space for creche staff) for apartments and duplexes. This is in excess of the requirement stated in the Development Plan.

Table 12.9 - Bicycle Parking Standards

Land Use	Criterion	Bike	Notes	Category	Norm or Max
Apartment, townhouse 1 bedroom	Unit	1	Plus 1 visitor space per 5 units	Residential	Norm
Hotel, Motel, Motor Inn, Guest House	Bedroom	0.1		Residential	Norm
Pre-school facilities / creche	Classroom	0.5		Education	Norm

Figure 4-8 Minimum Bike Parking Standards, Fingal County Council Development Plan 2017-23

## 5.0 Estuary West Masterplan, May 2019

The development strategy for Swords as set out in the Fingal Development Plan 2017-2023 incorporates Objective ‘SWORDS 27’ which included the requirement to prepare the Estuary West Masterplan (MP 8.A) in which the subject landholding is located. The Estuary West Masterplan was published in May 2019. Part A presents an overview of the three Swords Masterplans in place (Barrysparks and Crowscastle; Fosterstown; and Estuary West). Part D: Estuary West published in May 2019 pertains to the subject site (and adjoining lands to the west). The non-statutory nature of the masterplan should be noted. The Masterplan which was prepared independently by consultants commissioned by Fingal County Council, was subject to public consultation, and Strategic Environmental Assessment (SEA), and was noted and agreed by the Elected Members in May 2019. The proposed development complies with the overall objectives of the Fingal County Development Plan 2017-2023. The proposed development complies with the overall objectives of the Fingal County Development Plan 2017-2023.

### 5.1 Swords Masterplans - Part A

Part A of the Swords sets out the context for the Masterplans and largely focuses on Swords more broadly. Part A outlines the overarching principles that apply across all Masterplan areas (Figure 5.1), with full details and more specific principles set out within the plans for each of the three areas including Estuary West (Part D).



Figure 5-1 Overarching principles of Estuary Masterplan Swords

A description of how the proposed scheme integrates the overarching principles set out in Figure 5.1 is provided below:

Table 5-1 Integration of scheme with the Estuary Masterplan Swords

<p><b>A Growing Place</b></p>	<p>By generating population growth on a suitably designated and strategically located site within an approx. 600m walk (at its eastern most boundary in the Riverside Park) of the MetroLink Park &amp; Ride at Estuary West, the scheme will contribute to maximising the return on investment in this major capital works project. Notwithstanding this, the phasing plan proposed for the scheme is not exclusively reliant on Metrolink for public transport provision, with a high frequency and quality bus network also serving the scheme, including BusConnects.</p> <p>In designing the scheme, height, scale and massing decisions have been greatly influenced by the surrounding context particularly at the interfaces to adjoining residential neighbourhoods. For instance, the lower density and smaller scale housing proposed is located along the fuller stretch of the boundary with Jugback Lane /Terrace to ensure a sensitive response to the landscape and urban character of existing housing at Jugback Lane /Terrace, Applewood Close and the Thornleigh which range in height and form from 2-storey terraces to 3-storey duplex units. The typology and density proposed will improve overlooking and provide passive surveillance to the lane. The landscaping treatment will provide a planted buffer zone with a well-managed native hedge at c.1.5m height followed by the tree line and a generous footpath. Overall, the lane will become more residential and formal in character, with enhanced passive surveillance and a safe zone for pedestrians. The Block A1 apartments wrap around the Glen Ellan road and Jugback Lane /Terrace corner of the site, transitioning down to 4 storeys in height to ensure a smooth and sensitive departure from high to low density, in keeping with the Estuary West Masterplan. Notably, the private dwelling on the far side of the lane at the junction to Glen Ellan Road is well set back from the laneway and at a considerable distance of circa 40m from the hedgerow boundary of the scheme and approximately 50m from the 7 storey(max) apartments. Mature trees and dense shrubbery in the front garden area of the house provide a natural screening and will ensure there is no risk of overshadowing or overbearance to the existing dwelling.</p>
<p><b>A Connected Place</b></p>	<p>As described in Section 5.12 of the Planning Report, the connectivity strategy for the scheme has been designed on careful reflection of the transport and movement plan set out for the lands in the Estuary West Masterplan, May 2019. The proposed scheme aligns with the indicative pedestrian / cyclist links envisaged for the western boundary – allowing for direct connections to Jugback Lane /Terrace and to the adjoining Broadmeadow riverside lands to the northwest. The pedestrian link along the central spine/linear corridor of the scheme is a key feature, in keeping with the Masterplan vision, with the main vehicle access point proposed also lining up with the non-statutory local plan. In further alignment with the Masterplan, primary vehicular access point for the development is proposed onto Jugback Lane /Terrace. The internal street structure is of a similar layout to that set out in the Masterplan with an internal street connection to the adjoining Estuary West lands to the east proposed.</p> <p>The connections proposed will ensure a highly accessible scheme, providing a safe environment for pedestrians / cyclists from and through</p>



	<p>the lands to the proposed Metrolink station at Estuary West and to the broader cycling network proposed for the area as part of the Cycle Network Plan for the GDA. With excellent, high-capacity bus connections (in addition to the proposed Metrolink), there will be a reduced need for car-based journeys. With the integrated cycling network proposed and with the upgrades to peripheral roads (including improvements to footpaths and cycling infrastructure), the scheme also supports the role and function of the wider Swords area including Swords Main Street.</p>
<p><b>A Green Place</b></p>	<p>The landscaping and drainage proposals for the scheme are designed to integrate green principles throughout with a focus on continuity of green infrastructure across the scheme, mitigating flood risk with SuDs management techniques, and retaining, wherever possible, existing landscaping features including the historically important townland boundary of the central hedgerow that runs through the scheme. The result is a highly attractive development proposal that prioritises green spaces that offer a multitude of complementary functions for amenity and recreation, to landscaping, ecological and drainage purposes.</p>
<p><b>A Place for People</b></p>	<p>The 621 homes proposed offer a balanced mix and range of dwelling types, diversifying the local housing stock and offering a wide choice of homes that will respond to population growth across all age cohorts and which reflects the diversity of preferences that define the property market. In this way, the fully occupied development will be a diverse place with a broad household composition from families to young couples, single and older people. Public realm areas are designed to cater to a range of amenity needs with ample provision of easily accessible play and rest areas throughout. The Broadmeadow Riverside Park to be delivered in tandem with the residential elements of the scheme, brings a major new asset to existing communities in the north Swords area and for future residents – creating new opportunities for physical activity, both intentional and incidental. With the school reservation adjoining the scheme, the future educational needs of younger residents can be supported.</p>

## 5.2 Swords Masterplans – Part D: Estuary West

The non-statutory Estuary West Masterplan (Part D) presents a vision and a series of principles for the subject lands. A description of how the proposed scheme aligns with the vision and principles proposed in this non-statutory plan is provided below.

**The vision:** *Estuary West will become a vibrant residential and mixed-use community, with active and friendly streetscapes. The aim is to produce an exemplary environment; a place that is desirable to live and one which balances usable private space within an overall structure of high-quality public spaces. The community will be prioritised, with parks, open space and public plazas filtered throughout.*

**Response:** The scheme presented for approval has undergone an extensive planning and design evolution that has resulted in a development proposal that encapsulates and embodies all elements of the vision for the Estuary West lands. With the delivery of 621 no. unit scheme offering a range of houses, duplexes and apartments appealing to a broad ranging demographic from young families to single professionals and empty nesters. The fully occupied scheme will result in the creation of a vibrant new residential community located in a highly accessible and strategic location on the edge of Fingal Counties most important urban centre. As can be seen in the broad range of architectural and landscaping plans accompanying this proposal including the CGI images prepared by Modelworks, the physical elements of the scheme are designed around a fluid, easily navigable network of public open spaces and tree lined streetscapes that accommodate driver, cyclist and pedestrian in a safe and attractive environment. All units feature a suitable level of private open spaces, with additional communal or semi-private open spaces serving the apartment and duplex units. The public open spaces offer a discretely integrated range of amenity and recreation (active play and rest areas for young and old), sustainable mobility, drainage and ecological spaces which, as a collective, represent best practice in multi-functional, safe, attractive and active open spaces. The clever solutions proposed to drainage and ecological challenges are effectively solved while ensuring that the amenity, recreational and mobility needs of the community are prioritised – with parks, open spaces and public plazas filtered throughout. In this way, an exemplary environment is created – one that will ensure all future residents are afforded the highest standards for quality of life.



Figure 5-2 Built Form map from Estuary West Masterplan – Part D (Indicative Red line annotated by KPMG FA)

The applicant has reserved 0.46ha site within the applicants control for the development of school as indicated within the Masterplan and in consultation with the Department of Education. Primary access to the site will be through adjoining masterplan lands. The school site would be provided with access from the site.

A stormwater storage tank is proposed on lands adjoining Glen Ellan Road/Balheary Road Junction to the south-east of Masterplan land at the Celestica site to alleviate existing stormwater overflows at Ward River and Swords WWTP. These lands were indicated to provide part of the envisaged 18,000 sq.m of 'Flexible commercial' floor space that would include employment uses. Irish Water (IW) following detailed modelling and review of existing network constraints determined that a tank of 2,25m<sup>3</sup> volume is required at this location. The suggested location of the tank was identified as most suitable following review of three alternate locations due to topographical reasons. The suggested site is the lowest point along the foul water network that can be accessed by an adjacent road and facilitates an overflow to the Broadmeadow River via gravity. Other possible solutions were ruled out due to various infrastructural constrains. The infrastructural upgrades would be required across lands under different ownership including under River Ward and R132 road carriage. Since the catchment is very large removal of infiltration into foul water network would have lesser chances to succeed.

The construction of tank is likely to create minor impact to streetscape envisaged by Masterplan along Glen Ellan Road/Balheary Road Junction. The curtilage of the proposed tank will comprise native hedging surrounding palisade security fencing around the periphery of the tank. Access to the tank would be provided off Balheary road. Any future developments on the adjoining masterplan lands would therefore have to be designed around the tank requiring any future developments here to have an increased set back here. The increased set-back distance at this location would enable vehicles to have better line of site across the junction and would tie in with the setback pattern currently existing at the junction at Balheary Demesne, St. Colmcilles GAA club and Swords Business Campus.



Figure 5-3 CGI image showing proposed development at Balheary Road/Glen Ellan Road junction

**Principles:** The non-statutory Masterplan establishes nine principles to support the vision of the lands. A description of how the proposed scheme responds to these principles is set out in Table 3 below and illustrated in Figure 5.2 demonstrating how the principles have been incorporated to the proposed layout and design of the scheme.

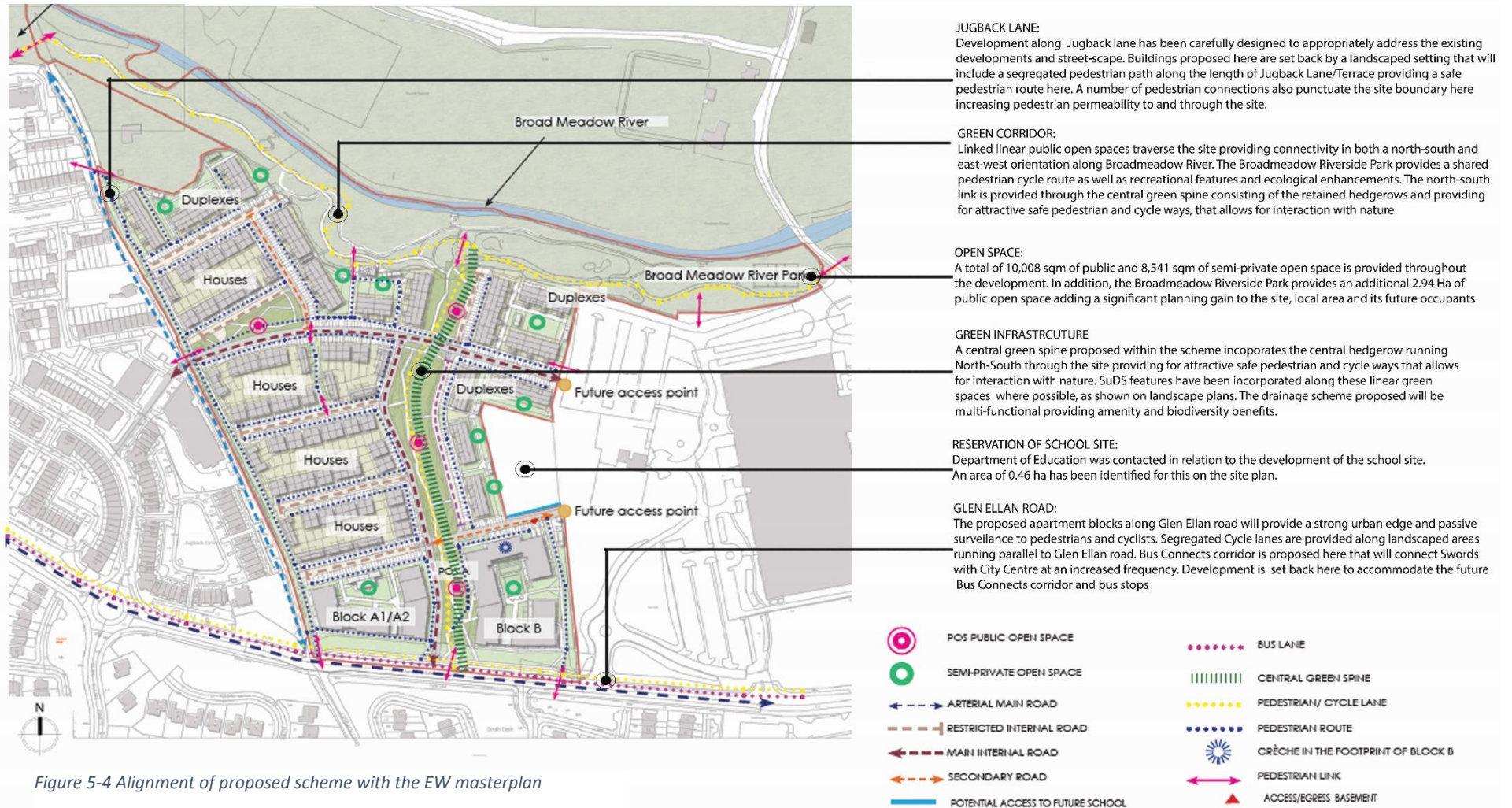


Figure 5-4 Alignment of proposed scheme with the EW masterplan

3.2.1 MASTERPLAN STRATEGY

TRANSPORT AND MOVEMENT OBJECTIVES

-  GDA Cycling Network Routes
-  Proposed junction upgrade
-  Internal road (including pedestrian facilities)
-  Vehicular access to Masterplan Areas
-  Local Vehicular Access (no through traffic)
-  Vehicular Access to basement / undercroft
-  Pedestrian/ Cyclist Links (indicative alignment)
-  Relevant pedestrian connections

-  School / Future Primary School
-  Creche - Footprint Apartment Block
-  Local center
-  Houses
-  Apartment
-  Duplexes
-  Flexible commercial

GREEN INFRASTRUCTURE

The following are the Key Objectives for the Estuary West Masterplan lands:

-  Facilitate the extension of the Broadmeadow River Park along the Broadmeadow River immediately to the north of the Masterplan lands encompassing pedestrian and cyclist infrastructure.
-  Provide two north-south green corridors linking the proposed extension to the Broadmeadow River Park to the Glen Ellan Road.
-  Ensure that the proposed link streets and local access streets as shown on the road hierarchy are lined with trees planted in constructed tree pits.



Figure 5-5 Illustrative proposal overlaid on EW Masterplan (Source: MCORM Design Statement)

Table 5-2 Response to Estuary West Masterplan Principles

No.	Estuary West Masterplan - Principles	Proposed SHD – Response
1	<p><b>Land Use</b> - The Masterplan lands shall be primarily residential in nature, with an element of commercial uses. The lands shall also facilitate community uses in the form of the proposed school and a local retail centre that will integrate Newtown House.</p>	<p>A total of 621 residential units, crèche facility and community amenities are proposed to be delivered. A 0.46ha site has been designated to accommodate a future school which will be sufficient to cater for a 16-24 classroom school as indicated by the Department of Education and Skills.</p> <p>The Masterplan proposes a local centre adjacent to Newtown House on lands to the east of application site. The subject site also benefits from proximity to the existing Applewood Neighbourhood Centre to the west of the subject lands. Direct connections (vehicle, pedestrian and bicycle) are also proposed to the Applewood Centre from the subject lands.</p> <p>The development also includes proposals to upgrade existing road and Irish Water infrastructure. The works would see construction of a stormwater storage tank and overflow outfall gravity sewer to the Broadmeadow River. The location of the tank and size has been determined by Irish Water modelling that reviewed existing capacity constraints within the network. The location of tank has been chosen giving consideration of minimum distance requirements from existing residential and other buildings and also with regard to the topography of the site as this area is the lowest point along the network that could facilitate overflow to Broadmeadow river via gravity. The tank would be located fully underground, with security fencing and hedging surrounding the tank.</p>
2	<p><b>Local Centre/ Newtown House</b> – The Masterplan will encompass a new local centre, based around Newtown House, to provide a place for people to fulfil their daily shopping needs, have lunch, or meet and socialise.</p>	<p>Newtown House is located on adjoining lands and does not form part of the subject application. Notwithstanding this, the future occupants of the subject site will utilise and benefit from the proposed local centre.</p>
3	<p><b>Open Space</b> – Green corridors and public open space along the Broadmeadow River facilitate pedestrian and cyclist access and support long-term sustainability of the area. Additional green corridors are proposed north-south through the lands, providing recreational areas and walking/cycling routes.</p>	<p>Linked linear public open spaces traverse the site providing connectivity in both a north-south and east-west orientation along Broadmeadow River. The Broadmeadow Riverside Park provides a shared pedestrian cycle route as well as recreational features and ecological enhancements. The north-south link is provided through the central green spine consisting of the retained hedgerows and providing for attractive safe pedestrian and cycle ways, that allows for interaction with nature.</p> <p>A total of 1 ha of public and 8,541 sqm of semi-private open space is provided throughout the development. In addition, the Broadmeadow Riverside Park provides an additional 2.94 Ha of public open space adding a significant planning gain to the site, local area and its future occupants.</p>

No.	Estuary West Masterplan - Principles	Proposed SHD – Response
4	<p><b>Transport and Movement</b> – The Masterplan seeks to facilitate strong pedestrian and cyclist connections, as well as strong connections to the town centre and public transport infrastructure. Car dominance will be discouraged, and active travel promoted. Pedestrian and cyclist connections have been incorporated to facilitate access to the Metro station and Swords Main Street.</p>	<p>Pedestrian and cycle pathways will link the site to Glen Ellan Road and Swords Main Street, connecting residents to the Swords Express Bus Service, other existing services and Bus Connects linkages. Pedestrian pathways will also link the site via the Broadmeadow Linear Park to the future Estuary Metrolink station and to the Applewood neighbourhood centre to the west. Reduced parking rates are proposed onsite encouraging a modal shift from car-based travel to other more sustainable methods of transport. A total of 786 bicycle spaces are proposed for visitor and resident use.</p>
5	<p><b>Interface Areas</b> – The building heights and typology proposed have considered adjacent communities and structures. Density and height respectfully transitioning down towards Jugback Lane from the centre of the plan lands, with heights of 2-3 storeys to reflect the current scale of development.</p>	<p>The proposed scheme reflects the objectives of the plan by siting the tallest buildings (1-7 storeys) adjacent to Glen Ellan Road. This creates a strong urban edge to the road and boundary of the site. The proposed built form transitions in height to two storey semi-detached and terraced housing adjacent to Jugback Lane /Terrace, respecting the character of the lane and the existing three storey dwellings in the adjacent development.</p>
6	<p><b>Built Form, Typologies and Density</b> – This Masterplan envisions a community that can adapt and grow with the changing needs of its residents, and incorporates a mixture of houses and apartments, and a mixture of bedroom sizes. Lower-density houses have been incorporated along Jugback Lane, while higher density apartments are located through the centre and south of the lands.</p> <p>The development management process will ensure that an adequate mix is maintained throughout the Masterplan lands, which are anticipated to support between 900 and 1,000 residential units. However, the eventual developed figure may be greater.</p>	<p>The 621 no. dwellings proposed offer a balanced mix and range of dwelling types to meet the diverse requirements of the property market and future residents. Lower-density houses are proposed to the west of the site adjacent to Jugback Lane /Terrace, while higher density apartments situated in close proximity to the creche, school reservation area (adjoining), adjacent to Glen Ellan Road to the front and centre of the site.</p> <p>The proposed scheme achieves a net density of 70 units per hectare. This is in line with the Estuary West Masterplan Vision for these lands.</p>
7	<p><b>Heights</b> – Overall heights on the land will range from 2- to 6-storeys. Along Jugback Lane, heights will be 2-3-storeys, with higher buildings at more appropriate locations, such as along Glen Ellan Road and the Broadmeadow River, where landmark buildings can act to give a sense of place/identity to this new community.</p>	<p>The proposed building heights range from 1 to 7 storeys with the taller apartment buildings flanking the entrance to the scheme on Glen Ellan Road, providing a strong urban edge along this boundary. Building heights step down to two storeys adjacent to Jugback Lane /Terrace.</p>
8	<p><b>Green Infrastructure</b> – Green Infrastructure is a key component of the</p>	<p>SuDS features have been incorporated along the linear green spaces where possible, as shown on landscape plans. The</p>

No.	Estuary West Masterplan - Principles	Proposed SHD – Response
	<p>design and layout of development, with flood risk mitigated by SuDS features. The extension to the Broadmeadow Riverside Park and other green corridors proposed will support a rich biodiversity in the area and support a reduced carbon footprint for new developments.</p>	<p>drainage scheme proposed will be multifunctional providing amenity and biodiversity benefits.</p>
<p>9</p>	<p><b>Strategic Flood Risk Assessment (SFRA) and Sustainable urban Drainage Systems (SuDS) -</b></p> <p>Roughan &amp; O’Donovan (ROD) Consulting Engineers have prepared SFRA and SuDS assessments for each of the Masterplan areas, which are published alongside these Masterplans. The proposed layout of each Masterplan area has been fully informed by these assessments. All proposed development within the Masterplan lands shall be fully informed by the Strategic Flood Risk Assessment and the SuDs Strategy prepared in conjunction with the Masterplan. All developers shall comply with the SFRA Recommendations, the SuDs Protocol and the SuDs Recommendations. The SFRA requires development within the Masterplan lands to reflect the flood mapping presented in the assessment and the recommendations set out in the Flood Risk Management Guidelines. All planning applications located within 40 metres of the identified floodplain in the Estuary West Strategic Flood Risk Assessment must include a detailed justification test in accordance with the Flood Risk Management Guidelines.</p>	<p>A site-specific Flood Risk Assessment prepared by JBA Consulting accompanies this application. The Flood Risk Assessment was carried out in accordance with the OPW’s ‘The Planning System and Flood Risk Management, Guidelines for Planning Authorities’. This assessment considers the flood maps compiled under FCC’s Strategic Flood Risk Assessment for the Estuary West Masterplan.</p> <p>A comprehensive SuDs plan for the proposed development has been prepared by Waterman Moylan in collaboration with Cunnane Stratton Reynolds – please refer to Proposed SUDS Drainage Layouts drawings by Waterman Moylan which shows the detail layout for SUDs proposals. Full details of the SuDs techniques and drainage management measures proposed are given within the Engineering Assessment Report</p>



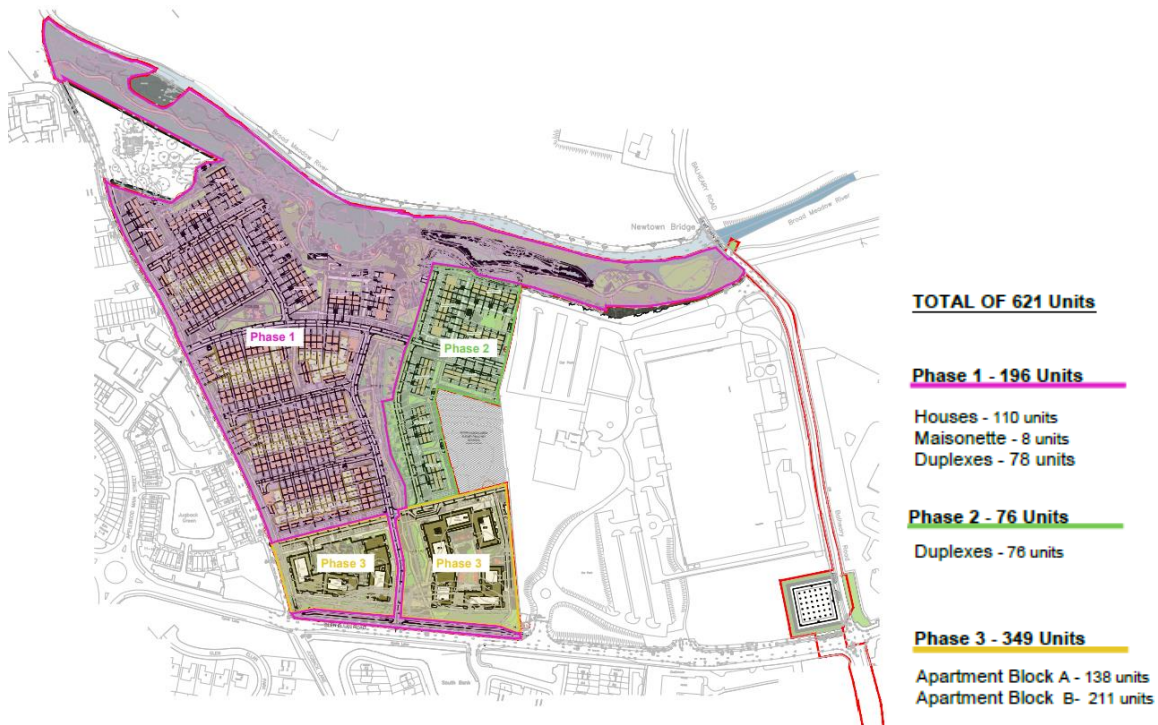


Figure 5-6 Phasing proposed for the current scheme prepared by McCrossan O'Rourke Manning Architects

The Masterplan also presents **phasing and implementation objectives** to manage the impact of development on the surrounding area and in particular on existing transport infrastructure throughout Swords. The housing crisis that has been a consistent feature of Irish society over the past few years remains unabated. Holybanks can accommodate large-scale housing for immediate development in line with the ambitions and targets set out within the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region. These strategic plans are reflective of earlier plans including *'Rebuilding Ireland – Action Plan for Housing and Homelessness'* which was prepared by the government to accelerate the provision of affordable housing across the country. The following key action is identified under Pillar 3: Build more Homes:

*'Doubling of output to deliver over 25,000 units per annum on average over the period of the Plan [2017-2021]...'*

The unlocking of key, serviced development lands is stated as a major impediment to the achievement of this target. In this instance, Cairn Homes can deliver housing on the subject site in the short to medium term however, the inclusion of a strict phasing plan within the masterplan will limit the delivery of affordable housing on the site and as such, should not be strictly adhered to.

The phasing and implementation objectives and associated schedule set out in the non-statutory Masterplan for Estuary West directly refers to the MetroLink project stating that *'no more than 25-30% of the overall quantum of development envisaged shall be constructed and occupied prior to the operation of Metrolink'*. While it is acknowledged that the Metrolink will greatly enhance public transport provision accessible to future residents of the proposed scheme, the full occupation of the scheme is not solely dependent on the operation of this rail corridor. The recently published Draft Transport Strategy for Greater Dublin Area 2022-42 envisages planning application for Metrolink to be made in 2022. The rail line is estimated to become fully operational by 2031. If the phasing plans envisaged within the Estuary West Masterplan were to be upheld, just 25-30% of the overall quantum

of development (on Estuary West lands) could be delivered over the next 10 years. The strict pursuit of this non-statutory phasing plan would render the proposed development entirely unviable and undeliverable. The phasing proposed fails to acknowledge that Estuary West is a strategic serviced site situated within the metropolitan area with access to a high frequency and high-capacity bus network including the BusConnects programme, and an excellent road network. The proposed development site is immediately adjacent to the high frequency (every 10-15 min) routes serving Applewood (Route X79) and Glen Ellan Road (Route 22) that connects the site with City Centre and UCD. Two coach stops are currently available along Glen Ellan road within 200m of the site entrance. During peak hours the bus service is available for the site connecting it with the city centre at a frequency of one bus every 7 minutes. The routes that serve the site are Swords Express routes: 507,500, 503, 500X and Dublin Bus routes 41a, 41c,43. Please refer to Public Transport Capacity Assessment which demonstrates the particularly high-capacity levels available within the local bus network.

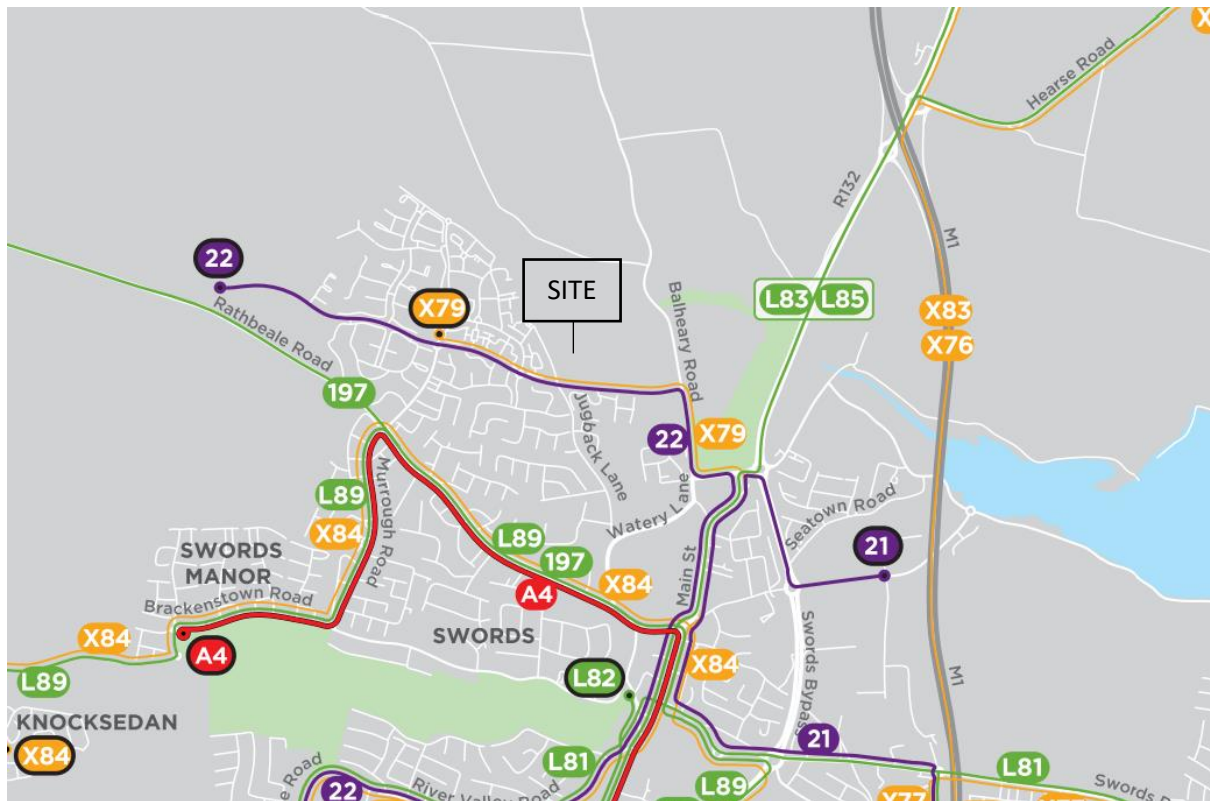


Figure 5-7 Bus connects revised routes

The table below shows how the proposed scheme complies with the key infrastructure requirements defining the phasing plan for the Masterplan lands.

Table 5-3 Response to Estuary West Masterplan Phasing Schedule

Estuary West Masterplan Strategic Infrastructure - Phasing Schedule	Proposed SHD – Response
Development to be undertaken during Phase 1 (essential infrastructure):	
<ul style="list-style-type: none"> <li>• Upgrade to the Glen Ellan Road</li> <li>• Provision of proposed school site and associated vehicular access.</li> <li>• Walking and cycling links to town centre, along Balheary Road and Jugback Lane</li> </ul>	<ul style="list-style-type: none"> <li>• Junction and road improvement works are proposed to the Glen Ellan / Balheary Road junction and R132/R125 Seatown West Roundabout. This will include widening of Balheary Road (South), upgrade works to cycle/pedestrian facilities and for the partial signalisation of R132/R125 junction.</li> </ul>

<ul style="list-style-type: none"> <li>• BusConnects service or similar enhanced bus service (required before commencement of Phase 2)</li> <li>• Pedestrian access to designated BusConnects (or similar) stops (required before commencement of Phase 2)</li> <li>• Linear SuDS facilities and associated amenity area to the west of the Masterplan area</li> <li>• Broadmeadow River green corridor - initial stage (Broadmeadow River Park extension)</li> </ul> <p>Masterplan Development</p> <ul style="list-style-type: none"> <li>• 320-350 residential units</li> <li>• School</li> <li>• 3,000 - 4,000 sq.m local centre</li> </ul>	<ul style="list-style-type: none"> <li>• Department of Education was contacted in relation to the development of the school site. An area of 0.46 ha has been identified for this on the site plan.</li> <li>• Pedestrian connections are provided along landscaped areas running parallel to Jugback Lane /Terrace and Glen Ellan road.</li> <li>• Bus Connects corridor is proposed on Glen Ellan Road along the south side of the site. The corridor will connect Swords to City Centre running every 10-15 min.</li> <li>• Development is set back from southern boundary to accommodate the Bus Connects corridor and bus stops</li> <li>• The development provides for SuDs measures as specified in the Masterplan</li> <li>• Broadmeadow River Park extension and all Public Open Space within the scheme will be provided within the phase 1 of the development.</li> </ul>
<p>Development to be undertaken during Phase 2 (essential infrastructure):</p>	
<ul style="list-style-type: none"> <li>• Green connection along the Broadmeadow River to connect the proposed regional park to the north-west of Swords to the Broadmeadow Estuary</li> <li>• Upgraded green infrastructure link through the Estuary Central Masterplan area</li> <li>• Completion of primary internal vehicular circulation area</li> </ul> <p>Masterplan Development:</p> <ul style="list-style-type: none"> <li>• 18-000 - 20,000 sq.m commercial floorspace</li> <li>• 520-570 residential units</li> </ul>	<ul style="list-style-type: none"> <li>• The River side park and green spine running north south through the site is set to be delivered as part of the Phase 1 of the Masterplan. This will enable future connection to the proposed regional park and expansion of Broadmeadow River Park.</li> <li>• The proposed development will provide internal road and circulation networks for a significant portion of the masterplan lands. Subject site does not include the commercial zoned lands.</li> </ul>
<p>Development to be undertaken during Phase 3 (essential infrastructure):</p>	
<ul style="list-style-type: none"> <li>• Broadmeadow River green corridor – completion</li> </ul> <p>Masterplan Development:</p> <ul style="list-style-type: none"> <li>• 60-80 residential units</li> </ul>	<p>The proposed development will provide for the entire section of Broadmeadow River Green corridor for Estuary West Masterplan Lands.</p>

In relation to all three proposed Masterplans (Estuary West, Barryspark and Crows Castle and Fosterstown), the Part A documentation states, in reference to the Transport Assessment prepared for the three Masterplans that: -

*‘In overall terms, the assessment indicated that approximately 25% of the quantum of development envisaged in the Masterplans could be delivered in advance of MetroLink being constructed...’.*

This assumes that all the masterplans would commence and be developed simultaneously. This is highly unlikely to occur, rather, development is likely to progress organically over a longer period of time. It is also based on existing traffic infrastructure and is intrinsically linked to traffic generation

from proposed future housing for all three Masterplan sites. Part A of the Masterplan goes onto state that:

*“..., however, the level of feasible development from site to site may vary depending on delivery of supporting infrastructure. Future development will be dependent on the assessment of individual development proposals through detailed Traffic and Transportation Impact Assessments.’*

In this regard, Waterman Moylan have prepared a Traffic and Transport Assessment in relation to the proposed scheme. The findings of the assessment indicate that the road junctions surrounding the site require upgrade works in order to accommodate the proposed scheme. These upgrades are proposed to be delivered as part of this SHD application and will be sufficient to accommodate the uplift in vehicular traffic generated by residents of the proposed scheme.

Section 2 (Planning and Economic Recovery) of the Planning Policy Statement 2015 (DECLG) calls for active land management by Planning Authorities as critical to *‘ensuring that land zoned for development actually comes into use as anticipated in development plans and in tandem with supporting infrastructure’*. Active land management should, it is stated, *‘ensure the strategic planning policy process is well positioned to respond in a dynamic manner to the changing nature of the housing market, and, in so doing, help ensure the right type of housing units are being provided at the most appropriate locations, in a timely manner.’* A central component of this approach is the *‘process of ensuring that when statutory land use plans identify lands that are most suitable for the delivery of the required housing units, housing units are delivered on the lands within the lifetime of the Plan or as soon as may be reasonably expected’*.

The long-term impact of Covid-19 on the wider economy, including the property market, has yet to be seen. Ireland was one of the few countries in Europe to completely shut down the construction industry during the Covid 19 pandemic. The post Covid lockdown atmosphere has also been challenging for the industry - with most companies reporting suboptimal operating conditions since the reopening, as evidenced by a recent survey of the sector undertaken by the Construction Industry Federation<sup>2</sup>.

The successful and appropriate merging of investment opportunities with land use planning to deliver vital housing projects is now more important than ever. Where viable plans for housing are brought forward on suitable landbanks which have been designated for housing, such as at the Holybanks / Estuary West site, and where there is sufficient capacity available within the existing public transport network (as the Public Transport Capacity Assessment submitted with this application attests), the delivery of much needed housing should not be unduly tied to the delivery of longer-term, major public infrastructural works projects such as Metrolink.

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<sup>2</sup> Economic Implications of the Lockdown in Construction, 9, March 2021  
<https://cif.ie/?wpdmdl=38428&ind=1615802143017>

## 6.0 Conclusion

The proposed development will provide for an appropriate form of high-quality residential development on an underutilised site within the settlement boundary of Swords, Co. Dublin. The development proposal now brought forward is the result of a carefully considered planning and design process which has been evolved and been enhanced by a detailed consultation process involving Cairn Homes, the design team, Fingal County Council, An Bord Pleanála and a range of other parties. The residential and ancillary uses proposed on this site is fully consistent with all relevant strategic planning policies, Ministerial Guidelines, and local planning policies.

This statement has demonstrated the compliance of the proposed scheme with the following statutory planning policies and guidelines:

- Project Ireland 2040: The National Planning Framework
- Project Ireland 2040: The National Development Plan 2021-2030
- Housing for All – a New Housing Plan for Ireland (September 2021)
- Rebuilding Ireland: Action Plan for Housing and Homelessness
- Smarter Travel – A New Transport Policy for Ireland 2009 – 2020
- Regional Spatial and Economic Strategy for EMRA (2019)
- Urban Design Manual – A Best Practice Guide (2009)
- Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2020)
- Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (Cities, Towns and Villages) 2009
- Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes, Sustaining Communities (2007);
- Design Manual for Urban Roads and Streets (2013)
- Urban Development and Building Height Guidelines (2018)
- The Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009)
- Guidelines for Planning Authorities on Childcare Facilities (2001)
- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities (2009)
- Part V of the Planning and Development Act 2000: Guidelines (2017) and Affordable Housing Act (2021), as amended
- Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment (2018)
- Fingal Development Plan 2017 – 2023
- Non-statutory Swords Masterplans (specifically ‘Part D’ relating to Estuary West)