

D C W N E Y

PLANNING STATEMENT

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

Applicant: Gerard Gannon Properties

April 2022

TABLE OF CONTENTS

1.0	INTRODUCTION	3
2.0	SITE LOCATION & DESCRIPTION	4
3.0	PLANNING HISTORY	6
3.1	Planning Applications pertaining to the Subject Site.....	6
3.2	Planning Applications pertaining to the Oldtown and Mooretown lands.....	7
4.0	PRE-APPLICATION CONSULTATION.....	8
4.1	Pre-application Consultation with Fingal County Council.....	8
4.2	Part V Engagement	9
4.3	Pre-Application Consultation with An Bord Pleanála	9
5.0	DESCRIPTION & MERITS OF THE PROPOSED DEVELOPMENT	11
5.1	Description of Proposed Development.....	11
5.2	General Layout.....	15
5.3	Building Height and Form	16
5.4	Nodes, edges, and landmark buildings	17
5.5	Communal and Public Open Space	18
5.6	Private Open Space	20
5.7	Density	20
5.8	Car & Bicycle Parking	20
5.9	Materials & Finish	21
6.0	LOCAL PLANNING POLICY CONTEXT	22
6.1	Fingal Development Plan 2017-2023	22
6.2	Oldtown-Mooretown Local Area Plan 2010-2016 (extended to July 2020)	31
7.0	ENGINEERING PROPOSALS	32
8.0	APPROPRIATE ASSESSMENT SCREENING	32
9.0	EIA SCREENING.....	33
10.0	CONCLUSION.....	34

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1.0 INTRODUCTION

Downey, Chartered Town Planners, 29 Merrion Square, D02RW64, have prepared this Planning Statement, on behalf of the applicant, Gerard Gannon Properties, to accompany a planning application to An Bord Pleanála for a proposed Strategic Housing Development on lands to the south of Rathbeale Road and to the north and south of Main Street and to the east and southeast of Mooretown Distributor Road (Western Distributor Link Road), Mooretown, Swords, Co. Dublin, with associated engineering works on lands locally known as the Celestica/Motorola site, junction of Glen Ellan Road and Balheary Road, and at/on Balheary Road, Swords, Co. Dublin.

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

The proposed development subject to this SHD application provides for construction of a total of 650 no. residential units including 265 no. houses (240 no. 3 beds and 25 no. 4 beds), 187 no. apartments, 6 no. triplex units, and 192 no. duplex units (113 no. duplex “house” units and 79 no. duplex “apartment” units), 1 no. childcare facility, 5 no. retail units, and 1 no. café/restaurant, along with associated car parking and bicycle parking, landscaping, boundary treatments, and public lighting; proposed new vehicular accesses onto Main Street and onto Mooretown Distributor Road (Western Distributor Link Road) which is partly constructed and also permitted under Reg. Ref. F20A/0096; proposed upgrades to public realm including footpaths, a new pedestrian/cyclist link via Abbeyvale Court; and all associated engineering and site works necessary to facilitate the development including the proposed stormwater storage tank and overflow outfall gravity sewer to the Broadmeadow River with associated manholes on lands locally known as the Celestica/Motorola site, junction of Glen Ellan Road and Balheary Road, and at/on Balheary Road, along with the proposed vehicular/service access onto Balheary Road, Swords.

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

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

- CCK Architects - Project Architect
- Doyle O'Troithigh Landscape Architecture - Landscape Architects
- Waterman Moylan - Civil, Structural, Traffic, Mechanical, and Electrical Engineers
- Dr. Pamela Bartley of Hydro-G – Hydrologist and Hydrogeologist

- Downey - Planning Consultant
- Model Works - Photomontage Consultants
- Digital Dimensions – CGI and Photomontage Consultants
- Altemar Ltd. - Ecological Consultants
- Courtney Deery Heritage Consultancy Ltd. - Archaeology Consultants
- Arborist Associates Ltd. - Arboricultural Consultants
- The Tree File Ltd. - Arboricultural Consultants
- DKP_{EV} Environmental - Specialist Environmental Consultants

It is submitted the proposed development offers an efficient use of appropriately zoned lands within the development boundary of Swords. The subject lands are located in Mooretown, Swords, Co. Dublin, and within the administrative area of Fingal County Council. With an approximate gross area of 18.378ha (14.47ha developable lands when excluding Class 1 open space, the existing Main Street link road and off-road cycle paths, the off-site drainage works, and opens space lands), the subject site is bounded by the Brackenstown Village to the south, Phase 2 lands of the overall residential scheme (Reg. Ref. F16A/0505) and the school campus (Reg. Ref. F18A/0163) to the north, and rural and agricultural lands to the west. Access to the site is currently from the Rathbeale Road via the Western Distributor Link Road (WDLR), which its southern extension forms the western boundary of the subject site.

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

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

2.0 SITE LOCATION & DESCRIPTION

The subject site is located to the south of the Rathbeale Road, Mooretown, Swords, County Dublin, and within the administrative area of Fingal County Council.

Mooretown is a townland on the western edge of Swords, south of the Rathbeale Road and bounded to the east and south by the existing housing estates of Cianlea, Ormond, Berwick and Abbeyvale. The lands to the west are agricultural, mostly dairy farming and some glasshouses for floriculture.

The subject lands are part of a larger landholding of c. 37.5 hectares within the ownership of Gerard Gannon Properties, comprising the balance of undeveloped lands in the most southern section of the overall landholding, adjacent to the Broadmeadow River. The subject site is the third phase of

Mooretown lands, for which various planning permissions have been sought and granted planning permission on approximately 18.25 ha of the overall site.

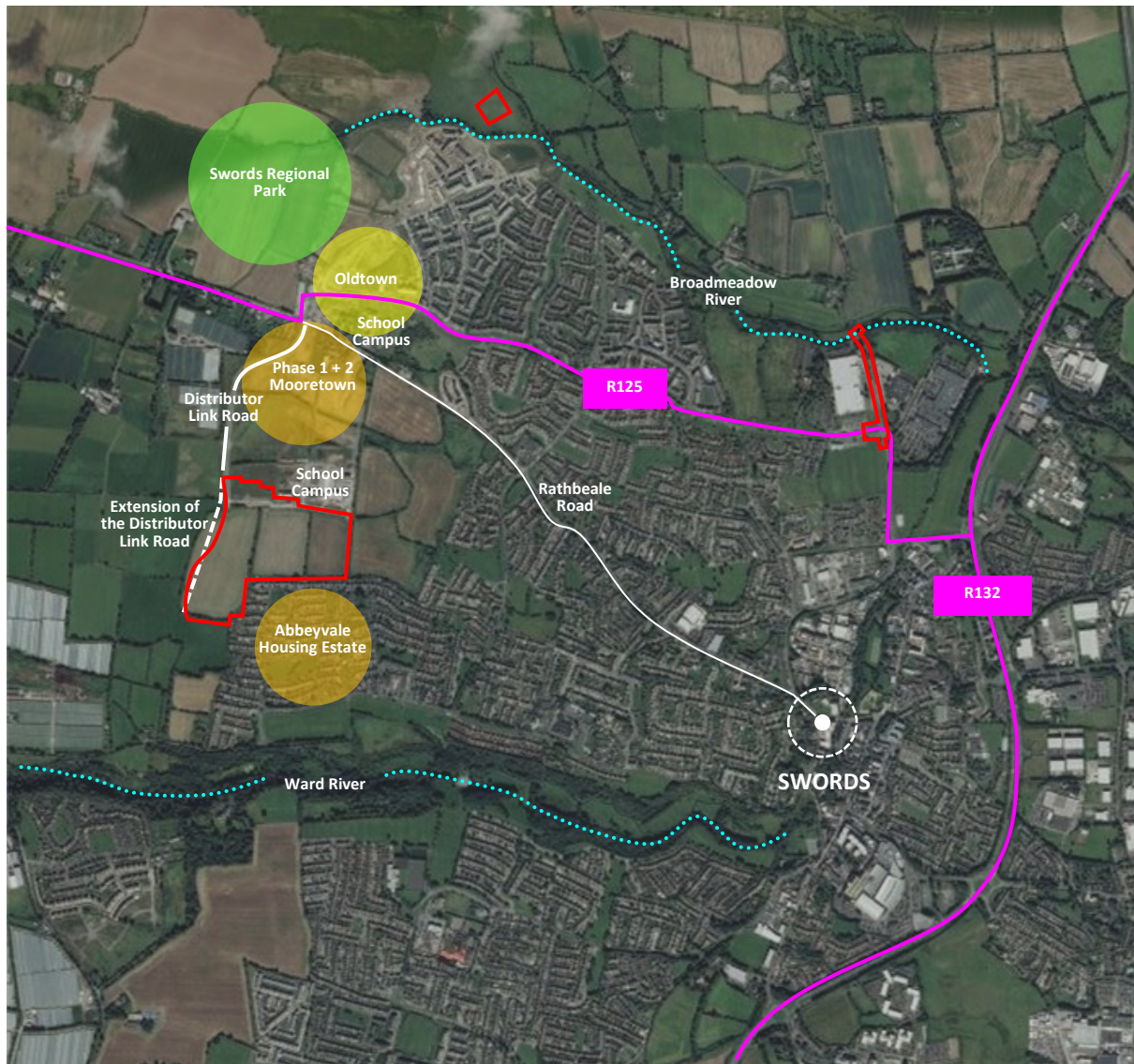


Figure 1. Aerial View of the Location of the Subject Site (approximate boundaries of the subject site outlined in red)

The development site is greenfield, formerly part of a larger dairy farm but more recently used for arable farming. Fields are defined by hedgerows and ditches, and the southern section of the site, the subject of this planning application, is divided into 3 fields marked by north-south hedgerows. The northern field boundary was removed to facilitate the construction of a link road to the new school campus (Main Street), but the southern field boundary remains. There are no constructed roads or services within the southern part of the application site, and there are two sets of overhead power lines crossing east to west.

A significant feature of the site is the slope regime which falls from high ground in the southwest corner (OD 56.97) by approximately 22m to the northeast corner (OD 34.66). In contrast, the lands in the northern section of the townland are much flatter and lower. The elevated parts of the site have good long distance views to Oldtown and Balheary in the north.



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

3.0 PLANNING HISTORY

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

3.1 Planning Applications pertaining to the Subject Site

As summarised below, there are 2 no. planning applications made on the subject lands:

- **Reg. Ref. F16A/0505** - By order dated 14th November 2017, Fingal County Council granted permission to Gannon Properties for construction of 188 houses and 50 apartments. The proposed houses comprise 72 no. four-bedroom two storey houses, 19 no. three-bedroom three storey houses and 97 no. three-bedroom two storey houses. The proposed apartments are in two blocks (A & B). Core A1 comprises 3 no. one-bedroom apartments, 17 no. two-bedroom

apartments and 1 no. three bedroom apartment in four storeys plus penthouse. Adjoining Core A2 comprises 3 no. one-bedroom apartments, 14 no. two-bedroom apartments and 1 no. three-bedroom apartment in three storeys plus penthouse. Block B comprises 2 no. one-bedroom apartments and 9 no. two-bedroom apartments in three storeys plus penthouse. The site area includes minor amendments to the site area of adjacent permission Reg. Ref. F15A/0183. The development includes all associated site works and infrastructure which includes landscaped open space, internal roads, paths, cycle-paths, public lighting, utilities, a reserved site for future ESB mast, drainage and surface water attenuation. This site is accessed from previously approved Swords Western Distributor Link Road (approved under Reg. Ref. F12A/0270, PL 06F.241634) and roads permitted under previously approved residential development Reg. Ref. F15A/0183.

- **Reg. Ref. F98A/0018** - By order dated 21st April 1998, Fingal County Council granted permission to Electricity Supply Board for an overhead electricity line of single circuit 110kV construction. The proposed line will be erected over, or in the vicinity of the townlands of Baleskin, Huntstown, Coldwinters, Newtown, Dunsoghly, Broghan, Bishopswood, Newpark, Shallon, Corrstown, Skephubble, Laurestown, Toberburr, Westereave, Mountambrose-Great, Killeek, Brazil, Rathbeal and Mooretown. The line will consist of three overhead wires supported on double wood pole structures, whose poles are 5 metres apart, and of average height of 20 metres. The angle structures will consist of lattice steel towers of average height of 13.5 metres and average base area of 5 metres squared.

3.2 Planning Applications pertaining to the Oldtown and Mooretown lands

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

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

4.0 PRE-APPLICATION CONSULTATION

4.1 Pre-application Consultation with Fingal County Council

4.1.1 Formal Section 247 Pre-planning Consultation

The formal Section 247 Pre-Application Consultation with the Planning Authority required under the Planning and Development (Housing) and Residential Tenancies Act 2016 took place on 17th May 2021 via Microsoft Teams. The initial concept design for the application site which were presented at this meeting provided for c. 677 no. dwelling units provisioned in a mix of houses, apartments, and duplex units along with a two-storey creche, a café, and retail units.

Hugh O'Neill, Planning (Senior Executive Planner), Eugenia Thompson, Planning (Senior Executive Planner), David Murray, Planning (Senior Planner), Anette DeKlerk, Planning (Planner), Philip Grobler, Planning & Strategic Infrastructure (Senior Executive Engineer), AnnaMarie Meagher, Parks and Green Infrastructure (Parks Officer), Gemma Carr, Parks and Green Infrastructure (Executive Parks Superintendent). The Design Team consisted of Michael Crowe (CCK Architects and Urban Designers), James Kelly (CCK Architects and Urban Designers), Pamela Gill (CCK Architects and Urban Designers), Lea Duran (CCK Architects and Urban Designers), Linda Doyle (Doyle O'Troithigh Landscape Architecture), Mark Duignan (Waterman Moylan), John Downey (Downey Planning), Eva Bridgeman (Downey Planning), and Client's Representative, Susan McClafferty.



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

The proposal set out during this consultation consisted of a residential scheme comprised of 677 no. units on an approximately 15ha developable land providing for a density of circa 45 units per hectare.

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

This consultation resulted in the design team giving further due consideration to layout and design in order to reflect the existing context, distinctiveness of the scheme, establishing character areas across the scheme, creating a hierarchy of streets, opens spaces, and nodes, having regards to the Objective DMS 03 of the Fingal Development Plan 2017-2023 which specifies submission of a Design Statement with this planning application, etc. This ultimately helped to inform the design of the proposed development. For further information on this pre-application meeting, please refer to the copy of the Fingal County Council's minutes of this meeting which are now appended to this report.

4.2 Part V Engagement

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

Noted that in light of recent Part V amendments following Housing Act 2021 and Housing Circular 28/2021 on Affordable Housing Act 2021, the Part V provision now provides for 20% of the overall units proposed. These have been identified on the architectural drawings and detailed Housing Quality Assessment (HQA) prepared by CCK Architects. In accordance with the Council's requirements, indicative costings are enclosed as part of this planning application. A validation letter from Fingal County Council's Housing Department is also enclosed with this planning application. Thus, it is considered that the proposal meets the requirements of Part V of the Planning and Development Act, 2000 (as amended).

4.3 Pre-Application Consultation with An Bord Pleanála

5.3.1 Formal Section 5 Pre-Application Consultation

Following consultation with Fingal County Council under Section 247 of Planning and Development Act, 2000 (as amended), a request to enter into pre-application consultation with An Bord Pleanála was submitted on 16th September 2021, with An Bord Pleanála subsequently accepting the Section 5 pre-application consultation request. The pre-application consultation meeting was then held virtually via Microsoft Teams on 19th October 2021. This meeting included representatives of the prospective applicant and their design team, the planning authority, and An Bord Pleanála in attendance.

On 29th October 2021, An Bord Pleanála issued the notice of pre-application consultation opinion for the proposed development, under case reference ABP-311441-21. Having regard to the above, the opinion states that *"An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development."*

The Board's opinion letter further notes 2 items to be submitted specifically with this SHD application. This includes: (1) Development Strategy, and (2) Irish Water.

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

1. *A quantitative and qualitative assessment which provides a breakdown of the public and communal open space areas. This assessment should include a detailed landscape plan including the provision of communal amenity spaces and play facilities in line with the Sustainable Urban Housing: Design Standards for New Apartments (2020) and the requirements of Fingal County Council Parks Department.*
2. *A phasing plan for the proposed development which includes the phasing arrangements for the delivery of the WDLR, public open spaces, surface water management proposals and Part V provision.*
3. *A Traffic and Transport Assessment including, inter alia, a rationale for the proposed car parking provision should be prepared, to include details of car parking management, car share schemes and a mobility management plan.*
4. *A Sunlight/Daylight/Overshadowing analysis showing an acceptable level of residential amenity for future occupiers and existing residents, which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development and in adjacent properties. This report should address the full extent of requirements of BRE209/BS2011, as applicable.*
5. *A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, pathways, entrances, boundary treatment/s and Village Centre. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development. The documents should also have regard to the long-term management and maintenance of the proposed development and a life cycle report for the apartments in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2018).*
6. *Additional Computer-Generated Images (CGIs) and visualisation/cross section drawings showing the proposed development in the context of the existing residential properties surrounding the site and the proposed development at key landmark views.*
7. *An updated Community & Social Audit indicating the likely additional demand for community facilities and the available capacity to accommodate this demand.*

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

Further Pre-Application Consultation with Fingal County Council

At this juncture, it is also important to note that this application now being submitted for a proposed Strategic Housing Development is the result of a detailed design review of the proposed development by the applicant and design team following receipt of the Board's Pre-Application Consultation Opinion. It is also the result of further off-line discussions between the relevant design team consultants and Fingal County Council's internal departments, including Roads and Transportation, and Parks and Green Infrastructure, prior to the formal lodgement of the application. Irish Water were also further consulted prior to lodgement.

5.0 DESCRIPTION & MERITS OF THE PROPOSED DEVELOPMENT

5.1 Description of Proposed Development

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

"We, Gerard Gannon Properties, intend to apply to An Bord Pleanála for a 10 year permission for a strategic housing development at lands to the south of Rathbeale Road and to the north and south of Main Street and to the east and southeast of Mooretown Distributor Road (Western Distributor Link Road), Mooretown, Swords, Co. Dublin, with associated engineering works on lands locally known as the Celestica/Motorola site, junction of Glen Ellan Road and Balheary Road, and at/on Balheary Road, Swords, Co. Dublin.

The development will consist of the construction of a total of 650 no. residential units (265 no. houses, 187 no. apartments, 6 no. triplex units, and 192 no. duplex units [comprising 113 no. duplex 'house' units and 79 no. duplex 'apartment' units]), 1 no. childcare facility, 5 no. retail units and 1 no. café/restaurant, all of which will be provided as follows:

265 no. residential houses (240 no. 3 bed houses, and 25 no. 4 bed houses) in detached, semi-detached, end-terraced, and mid-terraced houses ranging from two to three storey in height;

Duplex Block A containing a total of 12 no. units comprising of 2 no. 1 bed units, 3 no. 2 bed units, and 7 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; internal bike store; car parking and bicycle spaces, and bin stores;

Duplex Block B containing a total of 9 no. units comprising of 1 no. 1 bed unit, 2 no. 2 bed units and 6 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; internal bike store; 1 no. retail unit at ground floor level with associated signage; car parking and bicycle spaces, and bin stores;

Duplex Block C containing a total of 14 no. units comprising of 3 no. 1 bed units, 3 no. 2 bed units and 8 no. 3 bed units, in a building three storeys in height, and all units provided

with private balconies/terraces; internal bike store; car parking and bicycle spaces, and bin stores;

Duplex Block D containing a total of 10 no. units comprising of 1 no. 1 bed unit, 3 no. 2 bed units and 6 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; internal bike store; car parking and bicycle spaces, and bin stores;

Duplex Block E containing a total of 12 no. units comprising of 2 no. 1 bed units, 3 no. 2 bed units and 7 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; internal bike store; car parking and bicycle spaces, and bin stores;

Duplex Block F containing a total of 9 no. units comprising of 1 no. 1 bed unit, 2 no. 2 bed units and 6 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; 1 no. retail unit at ground floor level with associated signage; internal bike store; car parking and bicycle spaces, and bin stores;

Duplex Block G containing a total of 14 no. units comprising of 3 no. 1 bed units, 3 no. 2 bed units and 8 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; internal bike store; car parking and bicycle spaces, and bin stores;

Duplex Block H containing a total of 5 no. units comprising of 2 no. 2 bed units and 3 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; car parking and bicycle spaces, and bin stores;

Duplex Block I containing a total of 7 no. units comprising of 2 no. 1 bed units, 1 no. 2 bed unit and 4 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; internal bike stores; car parking and bicycle spaces, and bin stores;

Duplex Block J containing a total of 7 no. units comprising of 2 no. 1 bed units, 1 no. 2 bed unit and 4 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; internal bike store; car parking and bicycle spaces, and bin stores;

Duplex Block K containing a total of 16 no. units comprising of 5 no. 1 bed units, 2 no. 2 bed units and 9 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; internal bike store; car parking and bicycle spaces, and bin stores;

Duplex Block L containing a total of 8 no. units comprising of 1 no. 1 bed unit, 2 no. 2 bed units and 5 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; car parking and bicycle spaces, and bin stores;

Duplex Block M containing a total of 8 no. units comprising of 3 no. 2 bed units and 5 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; internal bike store; car parking and bicycle spaces, and bin stores;

Duplex Block N containing a total of 4 no. units comprising of 2 no. 2 bed units and 2 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; car parking and bicycle spaces, and bin stores;

Duplex Block O containing a total of 11 no. units comprising of 4 no. 1 bed units, 1 no. 2 bed unit and 6 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; internal bike store; car parking and bicycle spaces, and bin stores;

Duplex Block P containing a total of 5 no. units comprising of 2 no. 2 bed units and 3 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; car parking and bicycle spaces, and bin stores;

Duplex Block Q containing a total of 15 no. units comprising of 1 no. 1 bed unit, 5 no. 2 bed units and 9 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; internal bike store; car parking and bicycle spaces, and bin stores;

Duplex Block R containing a total of 7 no. units comprising of 2 no. 1 bed units, 1 no. 2 bed unit and 4 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; internal bike store; car parking and bicycle spaces, and bin stores;

Duplex Block S containing a total of 5 no. units comprising of 1 no. 1 bed unit, 2 no. 2 bed units and 2 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; car parking and bicycle spaces, and bin stores;

Duplex Block T containing a total of 5 no. units comprising of 1 no. 1 bed unit, 2 no. 2 bed units and 2 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; car parking and bicycle spaces, and bin stores;

Duplex Block U containing a total of 5 no. units comprising of 1 no. 1 bed unit, 2 no. 2 bed units and 2 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; car parking and bicycle spaces, and bin stores;

Duplex Block V containing a total of 4 no. units comprising of 2 no. 2 bed units and 2 no. 3 bed units, in a building three storeys in height, and all units provided with private balconies/terraces; car parking and bicycle spaces, and bin stores;

Apartment Block A containing a total of 40 no. units comprising of 10 no. 1 bed units, 24 no. 2 beds, and 6 no. 3 bed triplex units with all units provided with private balconies/terraces, in a building five storeys in height, with internal bicycle stores, bin stores and plant rooms at ground floor level; car parking within the undercroft car park and on-street, and bicycle parking;

Apartment Block B containing a total of 70 no. units comprising of 24 no. 1 bed units and 46 no. 2 bed units with all units provided with private balconies/terraces, in a building one to five storeys in height, with internal bicycle stores, bin stores and plant rooms at ground floor level; 2 no. retail units at ground floor level with associated signage; car parking within the undercroft car park and on-street, and bicycle parking;

Apartment Block C containing a total of 8 no. units comprising of 8 no. 2 bed units with all units provided with private balconies/terraces, in a building three to four storeys in height, with internal bin stores and plant rooms at ground floor level; 1 no. retail unit at ground floor level with associated signage; car parking within the shared parking court; bin stores and bike stores; and bicycle parking;

Apartment Block D containing a total of 8 no. units comprising of 8 no. 2 bed units with all units provided with private balconies/terraces, in a building three to four storeys in height, 1 no. café/restaurant unit at ground floor level with associated signage; car parking within the shared parking court; bin stores and bike stores; and bicycle parking;

Apartment Block E containing a total of 46 no. units comprising of 3 no. 1 bed units and 43 no. 2 bed units with all units provided with private balconies/terraces, in a building five storeys in height, with internal bicycle stores, bin stores and plant rooms at ground floor level; car parking within the parking court and on-street, and bicycle parking;

Apartment Block F containing a total of 21 no. units comprising of 6 no. 1 bed units and 15 no. 2 bed units with all units provided with private balconies/terraces, in a building four storeys in height, with internal bicycle stores and bin stores at ground floor level; car parking within the parking court and on-street, and bicycle parking;

1 no. childcare facility in a one to two storey building, with associated outdoor play area, car parking and drop-off/visitor parking, bicycle parking, and bin stores.

The development will provide for a total of 991 no. car parking spaces within the scheme; a total of 1141 no. bicycle spaces serving the apartments, triplex units, duplex units, childcare facility and commercial units; proposed new vehicular accesses onto Main Street and onto Mooretown Distributor Road (Western Distributor Link Road) which is partly constructed and also permitted under Reg. Ref. F20A/0096; proposed upgrades to public realm including footpaths, a new pedestrian/cyclist link via Abbeyvale Court, landscaping including play equipment, boundary treatments, and public lighting; and all associated engineering and site works necessary to facilitate the development including the proposed stormwater storage tank and overflow outfall gravity sewer to the Broadmeadow River with associated manholes on lands locally known as the Celestica/Motorola site, junction of Glen Ellan Road and Balheary Road, and at/on Balheary Road, along with the proposed vehicular/service access onto Balheary Road, Swords."

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

Table 1. Key Characteristics of the Proposed Development

Overall Site Area Subject to this SHD (incl. the off-site upgrade works)	18.378 ha
Net Site Area	14.47 ha
No. of Residential Units	650 units
<i>Houses</i>	266 units
<i>Duplexes</i>	113 units
<i>Triplexes</i>	6 units
<i>Apartments</i>	265 units
% of Dual Aspect Apartments	70%
Net Density	45 uph
Car Parking Spaces	991 no.
Bicycle Parking Spaces	1,141 no.
Residential Amenities	512 sqm (incl. a creche catering for up to c. 102 children)
Retail/Commercial Provision (Including a Café in Apartment Block D, and Cumulative Apartment Block B/C, Duplex Block B/F)	946 sqm
Class 1 Open Space Provision	2.6193 ha
Class 2 Open Space Provision	1.7232 ha

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

5.2 General Layout

The site layout is a permeable, legible and attractive network of residential character areas, streets and spaces. Streets in particular are designed as spaces in their own-right and create a hierarchy of space where pedestrians are considered first.

Desire lines to Main Street and the village centre follow direct but also slightly more organic routes by foot, bike or car. A nature trail hugging the east boundary and the larger nature park on the west boundary provides attractive alternatives to the most obvious and shortest route.



Figure 4. Proposed site layout CCK Architects)

Internal streets are tree-lined, with varying building types, forms and heights. Parking is a mix of on- and off-street, parallel, perpendicular and chevron. There are advantages and disadvantages to on and off-street, but a combination of the two is key to a more interesting neighbourhood. Homogeneity in the streetscape of a large development is to be avoided and parking solutions is one such means of doing this. Continuous and active edges provide enclosure and passive surveillance contributing to the comfort of pedestrians and cyclists. All residential buildings ‘turn the corner’ with specially designed end-units that present a public face at street junctions, and blank rear garden walls are kept to a minimum by the use of single-storey rear extensions and by ‘backless’ wide-fronted houses that have shorter rear gardens. Traffic speed within the development is calmed by design, using DMURS as a guiding reference. One-way systems are proposed on particular streets where dispersion of traffic is desired, and cyclists can enjoy the benefits of a counter-flow and/or ‘taking the lane’. Apartment and duplex buildings are generally laid out as larger perimeter urban blocks, presenting active frontages to the public realm. Communal open space for the residents is enclosed in the internal courtyard where it is overlooked and defensible by the residents.

5.3 Building Height and Form

Mooretown SHD is a mid to high density development of 45 units per hectare, which is deemed to be appropriate for an outer suburban site and with the level of public transport currently available. Higher density apartments and terraces of duplex units are generally clustered close to Main Street, beside

schools, shops and services. The balance of the site layout is populated by 2 and 3-storey terraced houses, with landmark duplex and apartment blocks at key junctions or nodes where they provide create visual interest and character, such as Apartment Block F, a 4-storey pavilion block in the southwest corner of the site and on the highest point. It is noted that the heights being proposed are suggested to be consistent with national planning guidelines, particularly the “*Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)*”.

5.4 Nodes, edges, and landmark buildings

There are a number of nodal points that offer areas of activity and focus at intersections on the desire lines of the proposed layout. A nodal point to the north of the site connects the boulevard into the main street which will offer amenities such as cafés and shops. To the west, nodal points are created linking the development into the proposed linear park that will form part of the necklace of green infrastructure to the Swords regional park to the north and the Ward River valley park to the south. Movement routes between nodal points have been identified and will be integrated into the site layout, these offer the provision of high quality, direct, safe and secure routes that connect the key locations along the desire lines. Connections are provided by way of primary, secondary and tertiary routes along with giving priority to pedestrians and cycles that encourage legible permeability. Connections between nodes are all defined by clear edges that will offer passive surveillance by active frontages. The avoidance of blank garden walls, gables will be achieved by the use of high-quality treatment for buildings that ‘turn the corner’. Connections between nodal points will also be provided with good visibility and preference is given to pocket parks over narrow alleyways.



Figure 5. Nodes, edges and landmark buildings

There are a number of landmark buildings proposed that will aid wayfinding and legibility within the development. These are set at key intersections within the layout.

1. The T-junction at the north intersection of Central Boulevard with Main Street is marked by pair of mixed-use red-brick buildings (apartment Blocks C and D) with shops and a cafe at ground level. They open out east and west onto two civic squares landscaped with external seating, raised planting and mature tree planting. The distinctive gable elevations are a nod to the many glasshouses located in this part of north county Dublin, some of which are visible from the Mooretown distributor road. Similarly, a series of three storey terraced houses mirror the gables of Apartment Blocks C + D at the southern end of the Central Boulevard visually linking the two ends of the street.
2. The west elevation of Apartment Block A, at the junction of the distributor road and Main Street, echoes the same gable facades and marks the primary entrance to the village centre and the new development.
3. The southwest corner of the site provides a high point on the slope; a 4-storey building overlooking the nature park and Mooretown distributor road creates a focal point assisting in the local sense of identity and place (Apartment Block G).
4. A 3-storey L-shaped duplex building at the southern end of Central Park will assist in closing the vista from North Street and Park Boulevard (Duplex Block T). This block has a strong roof profile and defined gables.
5. A pair of mirrored duplex blocks (Type N and O) bookend a terrace of 3-storey houses on the east side of Central Park. The gable motif is a recurring theme of the

5.5 Communal and Public Open Space

Public open space is provided at a rate of 25 sqm per bedspace, of which 11.9% of the developable site area is provided on site as public open space. The total number of bedspaces is calculated at 1,737 and the total area of public open space required is 43,425 sqm

Table 2. Open Space Requirement

Units	No. of Each	x Bedspaces	Total Bedspaces	x area	Open Space Required
1 & 2 Bed	269	x 1.5	403.5	x 25 sqm	10,087 sqm
3 & 4 Bed	381	x 3.5	1,333.5	x 25 sqm	33,337.5 sqm
Total	650	-	1,737	x 25 sqm	43,425 sqm

The location and area of each plot of public open space is depicted on Figure 6 and described in Table 3. Taken together, these demonstrate that of the 43,425 sqm of public open space required, 1,7232 sqm (1.72 ha) is to be provided within the proposed scheme. This is 11.9% of the net development lands (14.47 ha), calculated at 14,474 hectares. The balance of 26,193 sqm is to be provided on OS zoned lands as part of the Swords Regional Park, which is on the northern side of the Rathbeale Road.



Figure 6. Location of 'Class 2' public open space within and adjacent to the development CCK Architects)

Formal play equipment is provided where appropriate as well as along the perimeter nature walk and likely to be an asset rather than a nuisance as play equipment in smaller spaces can be a problem in terms of noise for nearby houses. A local playground is to be provided in the Central Park and the Archaeology Park. Pocket parks offer generous spaces to accommodate an informal kick-about area. A much larger playground with different zones for younger and older children is to be developed in the regional park. This playground is co-located with the playing pitch, MUGA and a trail of fitness stations. These figures, the plan and table are best read in conjunction with the Architect and Landscape Architects Drawings provided as part of the planning application package, but are summarised for the purposes of this EIAR.

Table 3. 'Class 2' Public Open Space Provided

Park	Area (sqm)	Description
East Square	1,137	Multi-purpose civic space in front of the primary school and linked to East Square by a wide path
West Square	416	Smaller, more intimate west-facing civic space with 'spill-out' from the shop/café and linked to East Square by a wide path
Pocket Park 01	735	Small amenity park buildings close to the edges on two sides
Pocket Park 02	500	Small active space on the eastern nature walk
Central Park	5,647	Large park with space for active play and kick-about

Park	Area (sqm)	Description
Ringfort Park	8,588	Large Park with space for active play and kickabout. Links directly into the eastern nature walk.
Abbeyvale	209	New open space to be contiguous with the existing park in Abbeyvale
Total		17,232 sqm

The public open space is designed to provide a clear definition of open space as public and communal, as distinct from private, and the organization of pocket parks define sub-character places within the scheme, e.g., the Central Park is a highly legible triangular space that helps to orientate visitors in the most intensely planned part of the development.

5.6 Private Open Space

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

5.7 Density

As outlined earlier, the site application subject extends to approximately 18.378ha. The quantum of developable land for the provision of housing and directly associated uses stands at 14.47 hectares providing an average residential density of 45 uph which has been calculated as per the provided guidance on the Appendix A of the *“Sustainable Residential Development in Urban Areas and Best Practice Urban Design Guidelines (2009)”*. This is submitted to be as the following:

- Overall Site Area Subject to this SHD Application: 18.378 ha
- Net Site Area: 14.47 ha
- Net Density: 650 units ÷ 14.47 ha = 45 uph

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

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

5.8 Car & Bicycle Parking

It is submitted that a total of 991 no. car parking spaces are proposed. It is submitted that the overall car parking proposed for the proposed scheme is below standards set out in the Development Plan,

which requires a total of 1,235 car parking spaces. Thus, the overall car parking provision may be considered to potentially materially contravene the Fingal Development Plan 2017-2023. This is fully addressed in the Statement of Material Contravention prepared by Downey, which we invite the Board to refer to.

In relation to the bicycle parking provision, an overall total of 1,141 cycle parking spaces is proposed, with 910 no. spaces for residents, 231 no. spaces for visitors, and 12 no. spaces to serve the creche and 6 no. spaces to serve the retail/café. The cycle parking proposed for the residents is submitted to be in line with the requirements set out in the 2020 Apartment Guidelines. It is also submitted that the cycle parking for visitors and for the non-residential units comply or exceed the requirements of the Development Plan. It is noteworthy to mention that the proposed development is located in an area served by good public transport which, as planned under BusConnects programme, is projected to be upgraded with more frequent and reliable routes. Moreover, cycle and pedestrian facilities in the locality are new (along R125 Rathbeale Road, Western Distributor Road and Glen Ellan Road) with good connections to bus stops and local amenities. Within the 15-minute cycle band from the site there are several retail, leisure, sports, and employment facilities available.

Therefore, based on the above and on the guidelines for parking as set out under the '*Sustainable Urban Housing: Design Standards for New Apartments*' Guidelines, the proposed car parking is considered appropriate to serve the subject development as it meets criteria to minimise car parking provisions, such as being served by public transport facilities and being close to a potential town centre and employment areas.

Please refer to the Traffic and Transport Assessment prepared by Waterman Moylan Engineering Consultants for further details on the proposed car parking and bicycle parking to serve the proposed development.

5.9 Materials & Finish

It is submitted that a Materiality and Finishes report is prepared by CCK Architects as part of this SHD application, which fully addresses this matter. This is suggested to be read in conjunction with the plans, sections, and elevation drawings, and Urban Design and Architectural Statement prepared by CCK Architects for further details on the designs, materials, and finishes. Please also refer to the photomontages and CGI's prepared by Model Works. The following provides an overview of the general materials and finishes.

A material palette is shared across the development with brick being the main contributor. It is robust, durable, and maintenance free and should weather gracefully over time. Each character area is proposed to have its own selected brick, the three distinct character areas are, Main Street (or Village Centre), East Mooretown, and West Mooretown. The concept across the development is that materiality will delicately evolve between each character area. This is achieved via specific detailing, scale, and choice of finishes. The evolution of these materials enables distinctiveness, identity, aiding way-finding, and a sense of place to the development as a whole. The material palette of brick and painted render are indicated on the drawings of both individual building types and composite elevations. In general terms, the houses and duplex buildings have a mixture of brick and render

finishes, while apartment blocks have a greater extent of brick, with elevations to the public realm often almost entirely in brick.

6.0 LOCAL PLANNING POLICY CONTEXT

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

6.1 Fingal Development Plan 2017-2023

4.1.1 Overarching Considerations

The subject site is located within the functional area of Fingal County Council. The development of the site is therefore informed by the policies and objectives of the Fingal County Development Plan. It is submitted that the Development Plan, and in particular the County Core Strategy, is updated with NPF/RSES population targets for the Dublin Region and Fingal County Council, however the proposed variation does not contemplate changes, but in fact facilitates achieving the updated population targets for Swords and the overall County.

4.1.2 Core Strategy & Housing Strategy

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

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

In this instance, the subject site forms part of the Oldtown and Mooretown lands in Swords. The design principles that informed the proposed layout reflected the urban design objectives of the since expired LAP for the area thus ensuring the development of these lands is consistent with earlier phases. The proposed development forms part of a wider residential scheme for the Mooretown lands granted under Reg. Ref. F15A/0183 (Phase 1), Reg. Ref. F16A/0505 (Phase 2), Reg. Ref. F18A/0701 (Phase 1A), Reg. Ref. F18A/0751 (Phase 1B), and Reg. Ref. F19A/0029 (Phase 1C). The proposed scheme comprises the third phase of the overall development for the Mooretown lands.

Outlined in the Variation No. 2 of the Development Plan, Swords currently provides for a significant employment base, reflecting its location proximate to the M1, M50 and Dublin Airport. The

Development Strategy for the town is of consolidation, active land management, employment generation and residential development centred around regeneration of the town centre and high-quality public transport in the form of Metrolink and Busconnects. Development will be appropriately managed through the provision of LAPs and Masterplans. Having regard to the status of the Key Town designation and the ongoing delivery of housing within Swords, a 15% increase in population is appropriate.

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

- *“To ensure Fingal County Council provides for the development of sufficient housing to meet its obligations as set out in the Regional Planning Guidelines.*
- *To identify the existing and likely future need for housing in the area of the Development Plan.*
- *To ensure that sufficient zoned lands are provided to meet the needs of the different categories of households.”*

It is submitted that the proposed development at Mooretown is consistent with the Variation No. 2 of the Development Plan, as well as housing strategy as it will assist in the delivery of housing, of a sustainable density, within a wider residential scheme granted under Reg. Ref. F15A/0183, Reg. Ref. F16A/0505, Reg. Ref. F18A/0701, Reg. Ref. F18A/0751, and Reg. Ref. F19A/0029, within close proximity to a public transport corridor, whilst providing a variety of unit types and mixed tenures for all, in a high-quality, vibrant community setting.

4.1.3 Sustainable Neighbourhoods and Communities

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

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

It is submitted that the proposed development at Mooretown is consistent with these criteria. The proposed residential development which incorporates 1 no. childcare facility (519 sqm), 5 no. retail units, and a café/restaurant is located in an area which benefits from ease of access to a range of transport modes (including bus) with cycling and walking also a key consideration of the proposed development. The influx of population arising from the proposed development will increase the critical mass required to further support public transport infrastructure. There is a range of facilities in the immediate vicinity of the subject lands including community facilities, sports clubs, etc. and within the wider Swords area. A Community and Social Infrastructure Audit, prepared by Downey Planning, also accompanies this SHD application request which provides detailed information and assessment on the existing infrastructure currently serving the Mooretown lands. The design of the proposed development provides for an attractive development with a sense of character and place that will integrate the proposed development with the surrounding area and assist in the completion of the wider residential scheme for the Oldtown-Mooretown lands.

4.1.4 Movement and Transport

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

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

The Plan notes that the integration of land-use and transport involves locating trip intensive land uses (such as high-density housing, offices, and comparison retail) near high capacity public transport (such as DART, Metro, Luas, and Bus Rapid Transit). It benefits the land uses by providing high quality public transport for the greatest number of residents and employees. It benefits public transport by providing sufficient customers within its catchment to sustain the high cost of public transport infrastructure and services.

Allowing higher density development to occur along public transport corridors increases the number of people within the walking catchment of the public transport service, which in turn increases the patronage of the service, and leads to an increase in its financial and economic viability and positive environmental impact. In this instance, the proposed development provides for a residential development of sustainable density within close proximity to high-frequency public transport in accordance with objectives set out within the Development Plan including:

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

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

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

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

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

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

It is submitted that the proposed development at Mooretown is consistent with these policies and objectives. The completion of this area of the Oldtown-Mooretown lands and wider area will ensure walking and cycling are viable options for the community, with the area also very well served by existing public transport infrastructure all of which will ensure that the future population utilise sustainable public transport and active travel options rather than car transport. This is outlined further in the enclosed Traffic and Transport Assessment prepared by Waterman Moylan Engineering Consultants.

4.1.5 Land Use Zoning

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

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

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

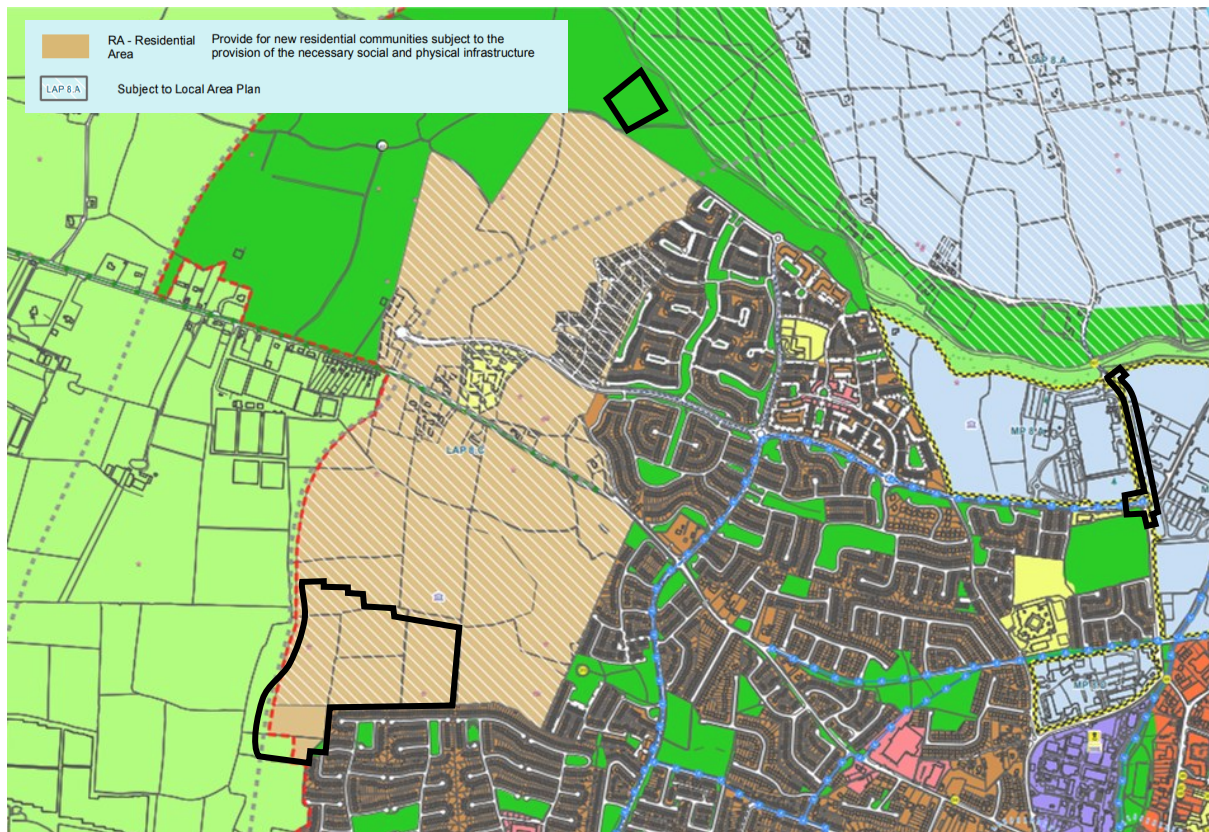


Figure 7. Land Use Zoning Map Extracted from the County Development Plan (application site outlined in black)

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

Uses Permitted in Principle under the RA Land Use Zoning

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

⁹ In a local centre only

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

Table 4. Permitted Uses under the RA Land Use Zoning

Therefore, the proposed mixed-used development providing for residential, community amenity, and retail/commercial services are permitted in principle under the zoning objectives pertaining to the subject lands.

It is also noted that the Class 1 open space lands to the north are zoned **OS-Open Space** –

“To preserve and provide for open space and recreational amenities”.

The proposed open space in this area is therefore permitted in principle under this zoning designation.

The proposed storage tank site is zoned **ME-Metro Economic Corridor** –

“To facilitate opportunities for high-density mixed-use employment generating activity and commercial development and support the provision of an appropriate quantum of residential development within the Metro Economic Corridor”.

The tank can be considered essential infrastructure and has been designed in conjunction with Irish Water. It will not only facilitate the connection requirement of this subject application but will also have the capacity to allow for continued development in the Oldtown/Mooretown catchment.

4.1.6 Development Standards

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

(A) High Quality Urban Design

The Development Plan defines several objectives to support high quality urban design. It will allow the creation of accessible places where people want to live, work, and spend time. It is the policy of the Council to ensure all development is of a high-quality design and promotes the achievement of accessible, safe and sustainable built and natural environments, which reflect the special character and heritage of the County and its varied townscapes and landscapes. Design principles are based on the ‘Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities’ and ‘Best Practice Urban Design Manual’, which contains twelve design principles to be applied to all developments with Objective DMS03 requiring:

Objective DMS03: *“Submit a detailed design statement for developments in excess of 5 residential units or 300 sq. m of retail/commercial/office development in urban areas. The design statement is required to:*

- *Explain the design principles and design concept.*
- *Demonstrate how the twelve urban design criteria (as per the 'Urban Design Manual - A Best Practice Guide') have been taken into account when designing schemes in urban areas. Each of the twelve criteria is of equal importance and has to be considered in an integrated manner.*
- *Outline how the development meets the Development Plan Objectives, and the objectives of any Local Area Plan, Masterplan, Urban Centre Strategy, Framework Plan or other similar Plan affecting the site.*
- *Include photographs of the site and its surroundings.*
- *Include other illustrations such as photomontages, perspectives, sketches.*
- *Outline detailed proposals for open space and ensure the provision of open space is designed in from the beginning when designing a new scheme.*
- *Outline a detailed high-quality open space and landscape design plan including specifications, prepared by suitably qualified professionals.*

- *Outline how Green Infrastructure integrates into the scheme."*

In accordance with the aforementioned objective, an Architectural Design Statement as been prepared by CCK Architects which sets out the proposed developments compliance with the 12 urban design criteria and how the proposed development accords with the requirements of Objective DMS03 of the pertaining Development Plan.

(B) Dwelling Mix

The Development Plan states that the dwelling mix in any residential scheme should provide a balanced range of dwelling types and sizes to support a variety of household types. The proposed development consists of 265 no. houses (240 no. 3 beds and 25 no. 4 beds), 187 no. apartments, 6 no. triplex units, and 192 no. duplex units (113 no. duplex "house" units and 79 no. duplex "apartment" units). In this regard, the proposed development provides for a mix of units in accordance with the Development Plan and the mix requirements as set out within the '*Sustainable Urban Housing: Design Standards for New Apartments*' Guidelines.

(C) Density

The Development Plan provides that the number of dwellings to be provided on a site should be determined with reference to the '*Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities*' (2009). Section 5.11 of the Guidelines encourages a net residential density in the range of 35-50 units/hectare for the subject lands. It also states that densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency. In this regard, the proposed development provides for a net density of 45 units per hectare (650 units on 14.47 hectares) and therefore accords with the density requirements of both the Development Plan and national guidelines.

(D) Apartment Developments

The '*Sustainable Urban Housing: Design Standards for New Apartments*' Guidelines have superseded the design standards for apartments as set out in the Development Plan. With regards to Dual Aspect the proposed development provides for a minimum of 70% dual aspect units in accordance with Objective DMS20 of the Development Plan.

The apartment floor areas are also in accordance with the '*Sustainable Urban Housing: Design Standards for New Apartments*' as set out in the enclosed Architectural Design Statement (Architects Report) prepared by CCK Architects and generally exceed the minimum standard. Please refer to the enclosed report for full details on the proposed developments compliance with standards for apartment developments.

(E) Daylight, Sunlight and Overshadowing

Objective DMS30 of the Development Plan requires that all new residential units comply with the recommendations of the '*Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice*' (B.R.209, 2011) and '*BS 8206-2:2008 Lighting for Buildings, Code of Practice for Daylighting*' or other updated relevant documents. This planning application is accompanied by a preliminary Daylight Assessment prepared by Waterman Moylan Engineering Consultants, which demonstrate that the

proposed development complies with aforementioned guidelines and accords with the BRE recommended daylight levels.

(F) Refuse Storage and Bins

The proposed development provides for refuse storage areas to rear gardens for those units benefiting of access to a rear garden (detached, semi-detached or end of terrace). Bin storage for mid-terrace houses is provided in the front gardens. Bins will generally be located behind a short screen and a soft landscaped strip where on-curtilage parking is provided. If on-street parking is proposed, the front gardens allow for landscape screening between the bins and the front railings. Communal bin stores are provided for the apartment buildings in enclosed spaces ensuring that refuse storage and bins are in accordance with Objective DMS36 of the Development Plan.

(G) Landscaping/Open Space

The Development Plan states that for all developments with a residential component, the overall standard for public open space provision is 2.5 hectares per 1000 population. In this regard, Objectives PM52 and DMS57:

“Require a minimum public open space provision of 2.5 hectares per 1000 population. For the purposes of this calculation, public open space requirements are to be based on residential units with 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 bedrooms.”

There is significant public open space in the vicinity of the subject site. The proposed development provides for a total of 4.3 ha of amenity space (incl. Class 1 and 2 open space) within the overall scheme to serve the proposed and existing units. This includes 2.6ha of Class 1 and 1.7ha of Class 2 open space. The subject site is also within proximity to Broadmeadow Park which comprises 8.58 ha of high quality public open space, the future Regional Park providing an additional 22 ha of open space, as well as the Rathbeale Archaeological Park to serve the residents of Mooretown and the wider area. The design of the proposed development has also sought to ensure that the public have access across the site with permeability and links a key criterion in the design evolution of the proposed development with pedestrian and cycle links provided throughout the scheme. This is detailed further within the Architectural Design Statement (Architects Report) and Landscape Design Report enclosed with this SHD application. It is important to note that the Regional Park is considered critical infrastructure within the pertaining Development Plan and thus represents a significant additional open space to be enjoyed by the future occupants of the proposed scheme, as indicated in Objective SWORDS 6 below.

Objective SWORDS 6 - *“Prioritise the early construction of the following critical infrastructure:*

- *The Western Distributor Road,*
- *The Fosterstown Link Road,*
- *The ‘Green link’ across the Ward River Valley,*
- *The Highfield Link Road,*

- *The two new roads (The Western and Eastern Avenues included as per the adopted Local Area Plan for Barrysparks) through the Barrysparks MC and adjoining HT zoned lands (These roads link the R132 and the proposed Airside - Drinan Link Road to the south), and*
- *Develop a Regional Park (of circa 65 ha) immediately west of Oldtown, and adjoining and ultimately extending into the Broadmeadow River Valley Linear Park, to serve Swords and its hinterland, and to comprise active recreational and passive activities, commensurate with the Council's vision for the emerging city of Swords, subjecting the proposal to Screening for Appropriate Assessment, in particular the cumulative impacts of increased access to European Sites."*

Apartment schemes must provide for communal open space, which is a critical environmental resource as a 'breathing space' and for meeting the amenity needs of residents. It may be in the form of accessible sheltered roof gardens, communal landscaped areas at ground level or at podium level where commercial or retail uses occupy the ground floor. Communal open space has been provided throughout the scheme for the enjoyment of residents.

In terms of private open space, the Development Plan states that, *"private open space associated with apartments and duplexes 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 and duplex type schemes. Whilst private and communal amenity space may adjoin each other, there should generally be a clear distinction with an appropriate boundary treatment and/or a 'privacy strip' between the two."*

Each apartment unit within the proposed development has been provided with adequately sized balconies or patios/terraces which have been designed in accordance with the pertaining quantitative and qualitative standards, with appropriate boundary treatments to ensure privacy and security.

Please refer to the enclosed schedule of accommodation prepared by CCK Architects which sets out the private and communal open space provided within each block, and to the enclosed landscaping documents prepared by Doyle & O'Troithigh Landscape - Architecture for further details regarding the landscape scheme for the proposed development.

(H) Childcare Facilities

The provision of childcare facilities is considered an important factor for economic and social wellbeing. The Council will seek to facilitate the provision of childcare facilities in appropriate locations throughout the County and may require their provision in accordance with the provisions of the DoEHLG 'Childcare Facilities Guidelines for Planning Authorities' (2001). The following objective of the Development Plan pertains to the proposed development:

Objective PM76: *"Require as part of planning applications for new residential and commercial developments that provision be made for appropriate purpose-built childcare facilities where such facilities are deemed necessary by the Planning Authority."*

As part of the scheme, the proposed development provides for a 512 sqm childcare facility which can accommodate circa 102 pre-school children. This would also be supported by the proposed childcare facility provisioned as part of the forthcoming planning application on Oldtown lands (by the same

applicant - Case Ref. ABP-307498-20), which will provide for 1 no. childcare facility of 519 sqm capable of accommodating circa 102 children and is submitted to be excess of what was initially projected to suffice the proposed scheme. Therefore, this is considered to be sufficient to cater for the proposed development. Please refer to the Community & Social Infrastructure Audit, Childcare Provision Assessment report, and School Demand Assessment report prepared by Downey for further details on the childcare and educational facilities to serve the proposed development.

In light of the above, it is submitted that the proposed development is consistent with the Childcare Facilities Guidelines and the requirements for the Fingal County Development Plan 2017- 2023.

(I) Car and Bicycle Parking Standards

It is submitted that a total of 991 no. car parking spaces are proposed. It is submitted that the overall car parking proposed for the proposed scheme is below standards set out in the Development Plan, which requires a total of 1,235 car parking spaces. Thus, the overall car parking provision may be considered to potentially materially contravenes the Fingal Development Plan 2017-2023. This is fully addressed in the Statement of Material Contravention prepared by Downey, which we invite the Board to refer to.

In relation to the bicycle parking provision, an overall total of 1,141 cycle parking spaces is proposed, with 910 no. spaces for residents, 231 no. spaces for visitors, and 12 no. spaces to serve the creche and 6 no. spaces to serve the retail/café. The cycle parking proposed for the residents is submitted to be in line with the requirements set out in the 2020 Apartment Guidelines. It is also submitted that the cycle parking for visitors and for the non-residential units comply or exceed the requirements of the Development Plan. It is noteworthy to mention that the proposed development is located in an area served by good public transport which, as planned under BusConnects programme, is projected to be upgraded with more frequent and reliable routes. Moreover, cycle and pedestrian facilities in the locality are new (along R125 Rathbeale Road, Western Distributor Road and Glen Ellan Road) with good connections to bus stops and local amenities. Within the 15-minute cycle band from the site there are several retail, leisure, sports, and employment facilities available.

Therefore, based on the above and on the guidelines for parking as set out under the '*Sustainable Urban Housing: Design Standards for New Apartments*' Guidelines, the proposed car parking is considered appropriate to serve the subject development as it meets criteria to minimise car parking provisions, such as being served by public transport facilities and being close to a potential town centre and employment areas.

Please refer to the Traffic and Transport Assessment prepared by Waterman Moylan Engineering Consultants for further details on the proposed car parking and bicycle parking to serve the proposed development.

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

The subject site forms part of the Oldtown and Mooretown lands in Swords, which were previously informed by the Oldtown-Mooretown Local Area Plan 2010-2016. The LAP had also been extended for a further five years from the 13th of July 2015 up to the 12th of July 2020. This final phase of the lands has been designed and proposed within the spirit of the Plan. As such, the proposed scheme is

considered to comply with the vision and aims of the since expired LAP and pertaining planning guidelines for the application site in the context of the wider Oldtown-Mooretown lands.

7.0 ENGINEERING PROPOSALS

Waterman Moylan Consulting Engineers have prepared an engineering pack for the proposed development. This is included under a separate cover. A Confirmation of Feasibility and Statement of Design Acceptance has been obtained from Irish Water confirming that there is capacity within the network to cater for the development and that the design is in accordance with their standards. Furthermore, the Flood Risk Assessment, prepared by Waterman Moylan Consulting Engineers confirms that the site is not within a flood risk area and thus is suitable for residential development.

8.0 APPROPRIATE ASSESSMENT SCREENING

The proposed development has been screened for Appropriate Assessment in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/32/EEC). Altamar Ltd. has prepared a report for Screening for Appropriate Assessment for the proposed development. In a strict application of the precautionary principle, it has been concluded that effects on Malahide Estuary SAC and Malahide Estuary SPA are likely from the proposed works in the absence of mitigation measures, as a result of a direct hydrological connection to the site via the proposed surface water drainage network, with possible downstream impacts from the project during the reprofiling, construction landscaping and drainage works. For this reason, an NIS was carried out to assess whether the proposed project, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites' conservation objectives, will adversely affect the integrity of the European Site. All other European sites were screened out at initial screening.

Construction on this site will create localised light and noise disturbance that will not impact on European sites. Mitigation measures will be in place to ensure that there are no significant impacts on the surface water that leads to Malahide Estuary SAC and Malahide Estuary SPA. Following the implementation of the mitigation measures outlined, the construction and presence of this development would not be deemed to have a significant impact. No significant impacts are likely on European sites, alone or in combination with other plans and projects based on the implementation of mitigation measures.

The report presents an Appropriate Assessment Screening and NIS for the proposed development. It outlines the information required for the competent authority to screen for appropriate assessment and to determine whether or not the proposed development, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites' conservation objectives, will adversely affect the integrity of the European site. On the basis of the content of the report, the competent authority is enabled to conduct an Appropriate Assessment and consider whether, either alone or in combination with other plans or projects, in view of best scientific knowledge and in view of the sites' conservation objectives, will adversely affect the integrity of the European site.

No significant effects are likely on European sites, their features of interest or conservation objectives. The proposed project will not will adversely affect the integrity of European sites. For further information in this regard, please refer to the Appropriate Assessment Screening and Natural Impact Statement Report prepared by Altamar Ltd.

9.0 EIA SCREENING

The EIA Directive was transposed into Irish Planning legislation on 1st September 2018. Section 172(1) of the Planning and Development Act 2000 (as amended) sets out the requirement for EIA. This current proposed project has been screened for EIA by the European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018).

The EIA Directives list those projects for which an EIA is mandatory (Annex I) and those projects for which an EIA may be required (Annex II). Annex I projects are listed in Part 1 of Schedule 5 of the Planning and Development Regulations 2001 as amended (“the Regulations”). The Project is not listed within Part 1 of Schedule 5 of the Regulations and therefore mandatory EIA is not required under Annex 1. Concerning Part 2 of Schedule 5 (Annex II) Projects, the relevant thresholds relating to the subject proposal are outlined below:

- **Class 10(b)(i) “Construction of more than 500 dwelling units.”:** This project comprises a residential development including the provision of 650 no. new residential dwelling units. Therefore, the Project exceeds the stated threshold, and an EIA is required in this context.
- **Class 10(b)(ii): “Construction of a car-park providing more than 400 spaces, other than a car-park provided as part of, and incidental to the primary purpose of a development.”:** The Project does not include a car park providing 400 no. spaces or more. Furthermore, all car parking is provided within the project is incidental to the primary purpose of the residential development. Therefore, the car parking element of the project does not fall within this Class of Regulations.
- **Class 10(b)(iv): “Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere”:** In this instance, the application site extends to c. 18.378 hectares within what can be considered a built-up area. Therefore, the project exceeds this threshold, and an EIA is required on this basis.

Additionally, the requirement for an EIAR in this instance was triggered by the legacy of the Oldtown-Mooretown LAP 2010-2016 (extended up to July 2020 and expired since) which pertained to the subject lands. The LAP contained two statements, which had implications for the requirement of an EIAR. The LAP referred to an E.I.S. which is what an EIAR was formerly known as. The first statement in question, referred to in Section 4 of the plan relating to phasing and implementation was as follows:

“An E.I.S for the developments shall be prepared and submitted, as determined by the Planning Authority. The EIS shall be submitted with every planning application”.

The second statement of interest is set out in Section 4.1 of the LAP, provided guidance on the phasing programme for development of the LAP, as follows:

“No one application for residential development shall be greater than 250 units”.

Furthermore, due to the location of the subject lands, the on-going delivery on the Oldtown-Mooretown lands and the potential cumulative impact it can have, an EIA is required, and thus an Environmental Impact Assessment Report has been prepared to accompany this planning application.

10.0 CONCLUSION

This Planning Statement has been prepared to accompany planning application to An Bord Pleanála for a Strategic Housing Development on lands south of the Rathbeale Road, Mooretown, Swords, Co. Dublin.

The proposed development subject to this SHD application provides for construction of a total of 650 no. residential units including 265 no. houses (240 no. 3 beds and 25 no. 4 beds), 187 no. apartments, 6 no. triplex units, and 192 no. duplex units (113 no. duplex “house” units and 79 no. duplex “apartment” units), 1 no. childcare facility, 5 no. retail units, and 1 no. café/restaurant, along with associated car parking and bicycle parking, landscaping, boundary treatments, and public lighting; proposed new vehicular accesses onto Main Street and onto Mooretown Distributor Road (Western Distributor Link Road) which is partly constructed and also permitted under Reg. Ref. F20A/0096; proposed upgrades to public realm including footpaths, a new pedestrian/cyclist link via Abbeyvale Court; and all associated engineering and site works necessary to facilitate the development including the proposed stormwater storage tank and overflow outfall gravity sewer to the Broadmeadow River with associated manholes on lands locally known as the Celestica/Motorola site, junction of Glen Ellan Road and Balheary Road, and at/on Balheary Road, along with the proposed vehicular/service access onto Balheary Road, Swords.

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

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

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

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

The proposed dwelling houses and apartment units meet the requirements of Fingal County Council and fully comply with the Fingal Development Plan 2017-2023, and the '*Sustainable Urban Housing: Design Standards for New Apartments*' Guidelines. All unit types proposed meet the minimum gross floor areas required and meet the aggregate living room, living areas, bedroom areas and storage areas required. Please refer to the accompanying drawings/schedule enclosed with this planning application for a full breakdown of living standards for each unit type. The delivery of 650 no. residential units at this location would add to the sense of community in the area, would represent an appropriate and sustainable land use, and would provide for an appropriate use on an otherwise underutilised site. Please also refer to the Urban Design and Architectural Statement prepared by CCK Architects which demonstrates the proposed development's compliance with the relevant planning policy and guidelines.

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