

DOWNEY

29 Merrion Square, D02RW64

PLANNING STATEMENT & STATEMENT OF CONSISTENCY

Proposed Large-Scale Residential Development

**Lands at Forest Road,
Swords,
Co. Dublin**

Client: Golden Port Homes Limited

June 2026

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D C W N E Y

INTRODUCTION

DOWNEY, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this Planning Report and Statement of Consistency with Planning Policy, on behalf of our client Golden Port Homes Limited, to accompany a proposed Large-Scale Residential Development (LRD) on lands at Forest Road, Swords, Co. Dublin. The proposed development provides for the amendments to the permitted 108 residential units, granted under Reg. Ref. LRD0057/S3. The proposed amendment application is seeking permission for amendments to the design of unit types, as well as a new underground pumping station located to the south of the site. The amendments being brought forward seek to improve the overall viability of the site, with the intention to bring this permission forward to construction.

The proposed development as per statutory planning notice is as follows:

“We, Golden Port Homes Limited, intend to apply for permission for a Large-scale Residential Development on lands at Forest Road, Swords, Co. Dublin. The proposed development will consist of amendments to the previously permitted development, granted under Reg. Ref. LRD0057/S3, and will comprise of amendments to the following 10 no. houses and 21 no. duplex units:

- 1. Amendments to house types B from a 2-storey 3-bedroom mid-terrace unit, to 3-storey, 4-bedroom, mid terrace units with associated elevational changes (2 no. houses in total);*
- 2. Amendments to house types C from a 2-storey 3-bedroom unit, to 3-storey, 3-bedroom unit with associated elevational changes (4 no. houses in total);*
- 3. Amendments to house types E from a 2-storey 3-bedroom unit, to 3-storey, 3-bedroom unit with associated elevational changes (4 no. houses in total);*
- 4. Amendments to the entrance to the ground floor Duplex Unit Types 1, 2, & 3 (17 no. units) to provide the entrance at the rear in lieu of the entrance to the front with associated elevational changes to all duplex units (21 no. units in total);*
- 5. Amendments to public open space, including modifications to paths and mounding;*
- 6. Provision of a new underground pumping station with ancillary landscaping, infrastructure and vehicular access.*
- 7. All associated site and infrastructure work, along with landscaping, necessary to facilitate the proposed development.”*

This development project has been shaped by insights gained from the previously permitted application, Reg. Ref. LRD0057/S3, (which included Stage 1 and Stage 2 Pre-Planning meetings), as well as a Section 247 Pre-Planning Consultation meeting to discuss the subject application. Given the minor nature of the subject application, Fingal County Council have issued a Section 247(7) Determination letter, confirming that the applicant does not to engage in Stage 2 LRD Pre-Planning meeting, and can proceed to lodgement of the application.

As such, the applicant is now seeking planning permission for the necessary amendments to the overall development. DOWNEY note that there are no changes to the overall number of units within the development (108 no. units), and that sufficient Class 1 and Class 2 Open Space remains to be

provided within the overall development. DOWNEY note that a childcare facility is to be provided as per Condition 2 attached to Reg. Ref. LRD0057/S3 and this is being agreed with the Planning Authority by way of compliance, rather than forming part of this application.

This Planning Statement outlines the context of the subject site and the background and rationale of the proposed development along with a statement of compliance with all relevant national, regional, and local planning policies. This document will be separated into two different sections: Part A will include a Planning Statement for the proposed development, with Part B outlining the Statement of Consistency with Planning Policy.

It is noted this report should be read in conjunction with the accompanying detailed documentation prepared by the design, landscape, and engineering teams, along with the relevant assessments submitted under the previously permitted application. DOWNEY note that the contents of the parent application (Reg. Ref. LRD0057/S3) contain all the relevant reports and assessments for the subject site and as this is an amendment application, we shall avoid undue repetition from that application and just discuss the proposed amendments that will be contained in this planning application proposal. The Planning Authority are invited to refer to the parent permission for further background documentation and assessments in this regard.

It is further submitted that the proposed development accords with the proper planning and sustainable development of the area, provides for a high-quality residential development and accordingly, planning permission should be granted by Fingal County Council.

PART A – PLANNING STATEMENT

1.0 SITE LOCATION AND DESCRIPTION

The subject site, which is the focus of this report, is a greenfield site measuring approximately 5.15 hectares. It was previously used as a golf driving range and is located at Forest Road, Swords, County Dublin, within the administrative area of Fingal County Council. The site is situated approximately 2.1 km southwest of Swords Town Centre, 1.5 km southwest of the Airside Retail Park, and 11 km north of Dublin City Centre.



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

The site has one existing access point located along its eastern boundary, providing direct access to Forest Road. The surrounding area is well-defined with the site bordered to the north by Ridgewood Green and primarily residential units, to the immediate east by Forest Road and Forest Little Golf Club, to the south by a detached residential dwelling along with farmland, and to the west by a greenfield site appearing in use as farmland. The site itself is characterised by a mature tree line along its northern, eastern and southern boundary with this considerably broken along its western boundary. While centrally to the subject site, as noted it is predominantly flat grassland broken up by a smattering of shrub and bush with a small, tarmacked area also located centrally within the site.

The subject site is strategically located in close proximity to key amenities, enhancing its accessibility and convenience. Notable nearby amenities include:

- Supermarket (north)- located approximately 210m in distance from the subject site, 3-minute walk, 1-minute cycle.
- Pre-school / childcare (north) - located approximately 210m in distance from the subject site, 3-minute walk, 1-minute cycle.
- Pharmacy (north) - located approximately 210m in distance from the subject site, 3-minute walk, 1-minute cycle.
- Medical Centre (north) – located approximately 200m in distance from the subject site, 3-minute walk, 1-minute cycle.
- Forest Little Golf Club – (southeast and east) – located approximately 600m in distance from the subject site, 8-minute walk and 2-minute cycle.
- Gym (northwest) – located approximately 650m in distance from the subject site, 9-minute walk and 2-minute cycle.
- Supermarket (northeast) - located approximately 800m in distance from the subject site, 10-minute walk and 2-minute cycle.
- Creche (northeast) - located approximately 800m in distance from the subject site, 10-minute walk and 2-minute cycle.
- Pharmacy(northeast) - located approximately 800m in distance from the subject site, 10-minute walk and 2-minute cycle.
- Restaurants and Cafes (northeast) within and surrounding Boroimhe Shopping Centre - located approximately 800m in distance from the subject site, 10-minute walk and 2-minute cycle
- Cedar Playground (northeast) – located approximately 1km in distance from the subject site, 13-minute walk and 3-minute cycle.
- Ridgewood Park (northeast) - located approximately 1km in distance from the subject site, 13-minute walk and 3-minute cycle.
- St Finian’s GAA Ridgewood Pitches (northwest) – located approximately 1.1km in distance from the subject site, 15-minute walk and 4-minute cycle.
- River Valley Rangers Ridgewood Pitches (northwest) – located approximately 1.1km in distance from the subject site, 15-minute walk and 4-minute cycle.
- Boroimhe Playground (northeast) – located approximately 1.1km in distance from the subject site, a 15-minute walk and a 3-minute cycle.
- Holy Family Junior School (north) - located 1.4km in distance from the subject site, 17-minute walk, 3-minutes cycle.
- Holy Family Senior School (north) - located 1.4km in distance from the subject site, 17-minute walk, 3-minutes cycle

In terms of connectivity, the site benefits from its proximity to key transport links. Specifically, the subject site is located just off Forest Road and is easily accessible via the nearby R132 regional road and the M1 motorway, which provides direct road connections to Dublin City Centre and beyond. Dublin Airport is situated just an 8-minute drive from the subject site, further enhancing its accessibility.

2.0 RELEVANT PLANNING HISTORY

DOWNEY has conducted a thorough review of the planning history associated with the subject site and its surrounding lands. A full review of the surrounding planning history is provided within the previous application (Reg. Ref. LRD0057/S3), which the Planning Authority are invited to refer to. The parent permission of the subject application is as below:

Reg. Ref. LRD0057/S3E: By Order dated 12th December 2025, Golden Port Homes Limited were granted permission on the lands at Forest Road, Swords, Co. Dublin for a development that was proposed to consist of the following:

“The proposed development will consist of a total of 109 no. residential units (42 no. duplex units; 41 no. apartments; 26 no. houses) as follows:

- i. *42 no. duplex units within 3-storey buildings comprising 21 No. 1 bed units at ground level and 21 No. 3 bed units over first and second floor levels with balconies/terraces, private and communal open space;*
- ii. *41 no. apartments within 2 blocks. Block A will be a 4 storey building with 14 no. apartments (5 no. 1 bed units and 9 no. 2 bed units) with balconies/terraces to the north, south and west elevations, and bin, bicycle parking and plant at ground floor level and pv panels at roof level; Block B will be a 5 storey building with 27 no. apartments (13 no. 1 bed and 14 no. 2 bed units) with balconies/terraces to the east and west elevations and bin, bicycle parking and plant at ground floor level and pv panels at roof level;*
- iii. *26 no. houses (comprising 5 no. 2 bed, 2 storey terrace houses; 6 no. 3 bed, 2 storey terrace houses; 4 No. 3 bed, 2 storey semi-detached houses; and 11 no. 4 bed, 3 storey houses);*
- iv. *96 no. Surface level car parking spaces and 4 no. surface level motorcycle parking spaces as well as bike parking stores and spaces; and bin stores;*
- v. *1 no. ESB substation;*
- vi. *Landscaping, including the provision of new public open spaces with play areas and a MUGA; footpaths and cycle paths, new vehicular access/egress from Forest Road; public lighting; boundary treatment and all associated site, drainage and development works necessary to facilitate the proposed development.”*

On 14th August 2025, Fingal County Council requested Further Information from the applicant, for which the principle of development has been deemed acceptable at this location. Following the lodgement of the Further Information Response, permission was granted on 12th December 2025 for a total of 108 no. units. We note that there is a condition, attached to the permission, requiring a childcare facility be provided as part of the development and this shall be provided by way of compliance submission.

3.0 PRE-PLANNING CONSULTATION

Section 247 Pre-Planning Meeting with Fingal County Council

In line with Section 247 Pre-Planning Consultation of the Planning and Development Act, 2000 (as amended), correspondence took place between Fingal County Council and the Design Team on 30th

March 2026 at 11:00 via a Microsoft Teams call. The following representatives were in attendance at this meeting:

Fingal County Council Planning Department: Gerrard Brennan, Solomon Aroboto, and Philip Mansfield

Fingal County Council Parks and Green Infrastructure Department: Gemma Carr

Fingal County Council Water Services: Philip Grobler

Fingal County Council Transportation Department: Shane Comaskey

Fingal County Council Housing Department: Ahmad Saad

Representative of the Applicant: Maurice Rafferty, and Dan Ryan

Crawford Architecture: John Crawford

Barret Mahony Consulting Engineers: Ciaran Kennedy and Abigail Harris

DOWNEY: Donal Duffy and Stephen Mahony

RMDA Landscape Consultants: Ronan MacDiarmada

This consultation meeting helped to inform the design of the proposed development, now being submitted for permission. The key aim of the Pre-Planning meeting was to discuss the proposal and key amendments to the previously permitted development under Reg. Ref. LRD0057/S3.

The Pre-Planning meeting was a positive meeting with no major issues raised, and the Planning Authority deemed the development to be acceptable in principle, giving the applicant clear direction in what is needed for the planning application, now being submitted. Key items discussed included the relation between the proposed development and the new access road within the site, as well as ensuring that sufficient open space was provided within the site.

Most notably, following this Pre-Planning Consultation, a Section 247(7) Determination Letter has been issued to the applicant, confirming there is no requirement to engage in Stage 2 LRD Pre Planning consultation and can proceed directly with a planning application. As such, there is no such LRD Opinion Letter which requires any response.

4.0 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 applicant has been in continuous engagement with the Housing Department of Fingal County Council to agree on Part V provision.

A Part V validation letter was previously obtained from Fingal County Council for the development permitted under Reg. Ref. LRD0057/S3, and as the subject application is not seeking an increase in any housing unit, there are no changes required to the Part V provision on site.

5.0 DESCRIPTION AND RATIONALE OF PROPOSED DEVELOPMENT

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

“We, Golden Port Homes Limited, intend to apply for permission for a Large-scale Residential Development on lands at Forest Road, Swords, Co. Dublin. The proposed development will consist of amendments to the previously permitted development, granted under Reg. Ref. LRD0057/S3, and will comprise of amendments to the following 10 no. houses and 21 no. duplex units:

- 1. Amendments to house types B from a 2-storey 3-bedroom mid-terrace unit, to 3-storey, 4-bedroom, mid terrace units with associated elevational changes (2 no. houses in total);*
- 2. Amendments to house types C from a 2-storey 3-bedroom unit, to 3-storey, 3-bedroom unit with associated elevational changes (4 no. houses in total);*
- 3. Amendments to house types E from a 2-storey 3-bedroom unit, to 3-storey, 3-bedroom unit with associated elevational changes (4 no. houses in total);*
- 4. Amendments to the entrance to the ground floor Duplex Unit Types 1, 2, & 3 (17 no. units) to provide the entrance at the rear in lieu of the entrance to the front with associated elevational changes to all duplex units (21 no. units in total);*
- 5. Amendments to public open space, including modifications to paths and mounding;*
- 6. Provision of a new underground pumping station with ancillary landscaping, infrastructure and vehicular access.*
- 7. All associated site and infrastructure work, along with landscaping, necessary to facilitate the proposed development.”*

As previously advised, it is important to note that the overall nature of the development and the changes are related to some changes to house types, and the provision of a new foul water pumping station. The same road layout and location of open space areas are not proposed to be changed, and there are no changes to the overall number of units being proposed. As such, key characteristics such as, number of units, open space areas, density, car and bicycle parking, access and road layout etc., all remain as per the permitted development under Reg. Ref. LRD0057/S3.

As can be seen when comparing the proposed layout in Figure 3 below, and the previously permitted layout in Figure 4, there is no material difference between them. The main difference from a site layout perspective will be the provision of a foul water pump station at the open space on the southern part of the site. There is no change to the layout of the residential portion of the site.



Figure 3. Proposed Site Layout subject to this amendment application



Figure 4. Previously Permitted Site Layout Plan as approved under LRD0057/S3

DOWNEY invite Fingal County Council to refer to the architectural drawings prepared by Crawford Architects, and Landscape Drawings prepared by RMDA Landscape Architects, as well as the other consultants, for further details on the proposed development, all of which are submitted under separate cover.

5.1 House Type Amendments

The proposed changes to some of the house types is limited to the utilisation of the attic space to provide for extra habitable floor area to some of the houses. House Type B will change from a 2-bedroom house to a 3-bedroom house. However, House Types C & E will remain as 3-bedroom houses but will benefit from home studies/office space. Such a room is becoming an ever-increasing demand for homeowners as people need these areas for home-working and for study purposes.

The palette of materials is consistent with the approved scheme with a new box dormer style window to the front of the houses and Velux style roof lights proposed at roof level to accommodate the new living space at second floor level. This ensures that there is no possibility for overlooking private amenity areas of neighbouring houses. Furthermore, there will be no material increase in overall heights of the houses, with the ridge levels increasing by a mere 100mm on average to accommodate the habitable space in roof level.

The proposed changes to the house types are indicated in the images below and for more details, the Planning Authority are invited to refer to the enclosed plans prepared by Crawford Architecture.



Figure 5. Previously Approved House Type B (top) and proposed House Type B (bottom)



Figure 6. Previously Approved House Type C Floor Plans (left) and proposed House Type C Floor Plans (right)



Figure 7. Previously Approved House Type C Elevations (Top) and proposed House Type C Elevations (bottom)

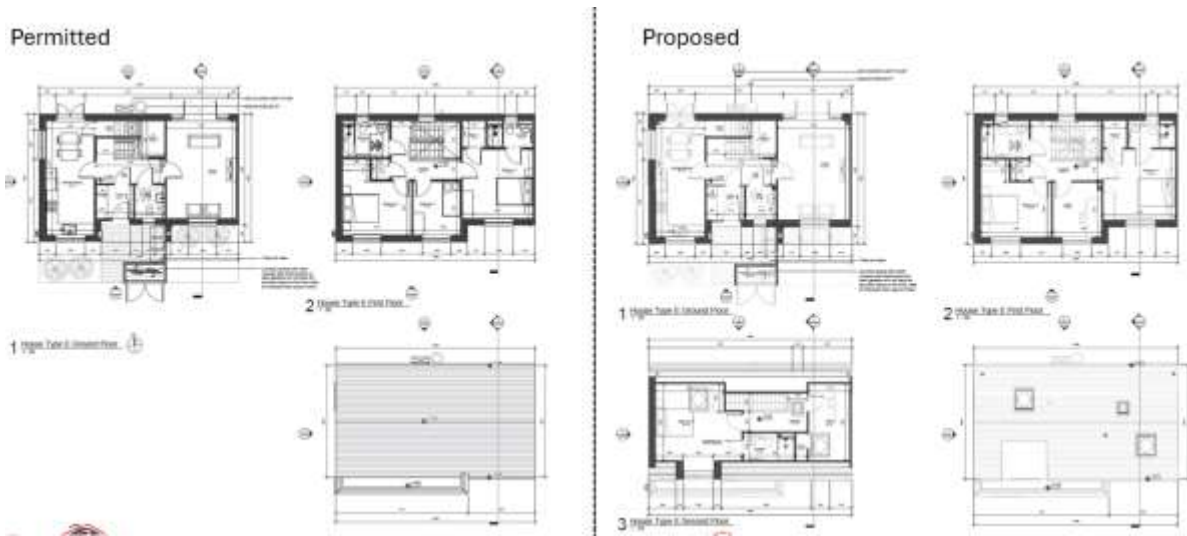


Figure 8. Previously Approved House Type E Floor Plans (left) and proposed House Type E Floor Plans (right)



Figure 9. Previously Approved House Type E Elevations (Top) and proposed House Type E Elevations (bottom)

The subject application is also seeking amendments to the previously approved duplex units. Within the parent permission, Reg. Ref. LRD0057/S3, permission was granted for 42 no. duplex units comprising 21 No. 1 bed units at ground level and 21 No. 3 bed units over first and second floor levels. The subject application is not seeking any amendments to the total number of duplex units, or to the unit mix, however, permission is being sought for changes to the external elevations to provide a new front-door entrance at the rear in lieu of the entrance to the front, which will provide access to the upper floor's unit. This amendment is considered to have minimal impact on the visuals of the overall unit (as per Figure 10 below), however, will significantly enhance the residential amenity for future

residents, as it will provide own-door living for these units. Permission is also being sought for associated minor changes to the windows on the rear elevation.



Figure 10. Previously Approved Duplex Elevations (right) and proposed Duplex Elevations (left)

5.2 Pump Station

Following the granting of permission under LRD0057/S3, engagement took place with Uisce Eireann regarding the connection agreements. At this point, it became evident that a pumping station will be required to connect the permitted housing development to the existing foul water system on Forest Road. The Planning Authority are invited to refer to the enclosed information prepared by Barrett Mahony Consulting Engineers for further information in this regard.

The new pumping station is proposed to be located on the large open space but shall be located as far west as possible in order to maximise screening and to avoid undue changes to the previously permitted play areas and MUGA. A new set down area for service vehicles is also proposed. The pump station is set back the required distances from existing and permitted houses. Given the majority of the infrastructure is below ground, it will not give rise to any visual impact. The security fencing will be screened by way of vegetation, and the Planning Authority are invited to refer to the enclosed landscaping details by RMDA Landscape Architects for further information.

4.0 PLANNING POLICY AND CONTEXT

The proposed development is consistent with all relevant national, regional, and local planning policies and guidance as pertained to that of the subject lands and immediate and wider context. In this regard,

Part B of this report contains a Statement of Consistency with Planning Policy. In order to avoid undue repetition, Fingal County Council are invited to refer to Part B of this report to confirm how the proposal is consistent with the relevant national, regional, and local planning policy.

Notwithstanding that, it is important to confirm the fundamental planning policies as they relate to the site, particularly land use zoning.

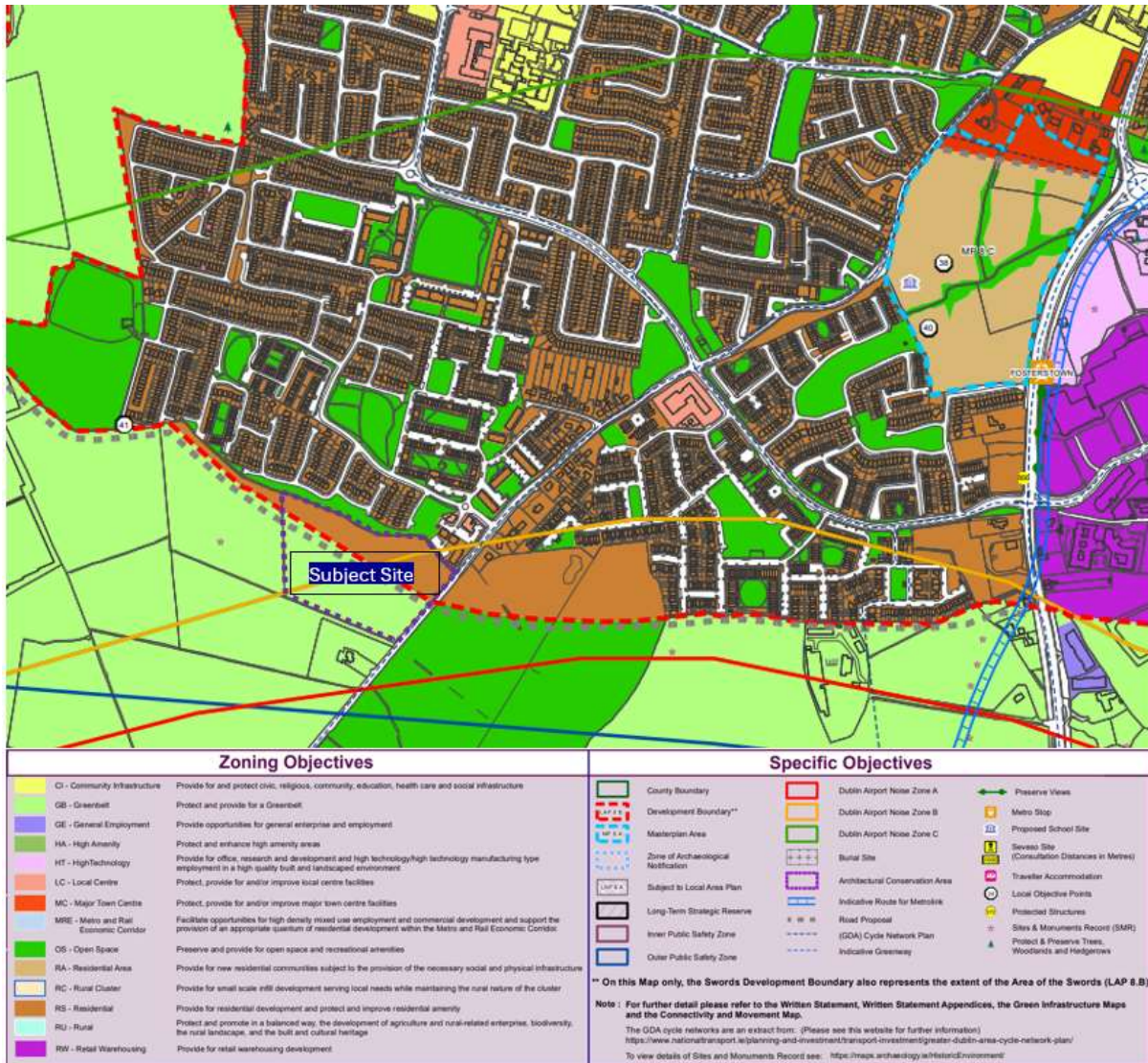


Figure 11. Land Use Zoning Map Extracted from the Development Plan (application site outlined in purple dash)

Under the Fingal Development Plan 2023-2029, the majority of the subject site sits partially within the following zoned areas.

The northern element of the subject site: zoned “RS - Residential” – its objective: “Provide for residential development and protect and improve residential amenity.”

The vision for this objective seeks to:

“Ensure that any new development in existing areas would have a minimal impact on and enhance existing residential amenity.”

USE CLASSES RELATED TO ZONING OBJECTIVE

Permitted in Principle		
Bed and Breakfast	Childcare Facilities	Community Facility
Education	Guest House	Office Ancillary to Permitted Use
Open Space	Residential	Residential Care Home/ Retirement Home
Retirement Village	Sheltered Accommodation	Traveller Community Accommodation
Utility Installations		

Figure 12. RS Land Zoning Objective Extracted from the Development Plan

The southern element of the subject site: zoned “GB – Greenbelt” – its objective: “Protect and provide for a Greenbelt.”

The vision for this objective seeks to:

“Create a rural/urban Greenbelt zone that permanently demarcates the boundary (i) between the rural and urban areas, or (ii) between urban and urban areas. The role of the Greenbelt is to check unrestricted sprawl of urban areas, to prevent coalescence of settlements, to prevent countryside encroachment and to protect the setting of towns and/or villages. The Greenbelt is attractive and multifunctional, serves the needs of both the urban and rural communities, and strengthens the links between urban and rural areas in a sustainable manner. The Greenbelt will provide opportunities for countryside access and for recreation, retain attractive landscapes, improve derelict land within and around towns, secure lands with a nature conservation interest, and retain land in agricultural use. The zoning objective will have the consequence of achieving the regeneration of undeveloped town areas by ensuring that urban development is directed towards these areas.”

USE CLASSES RELATED TO ZONING OBJECTIVE

Permitted in Principle		
Agricultural Buildings	Agri-Tourism	Bed and Breakfast ³
Boarding Kennels ³	Burial Grounds ²⁹	Childcare Facilities ³
Community Facility	Farm Shop ²⁰	Golf Course
Guest House ³	Health Practitioner ³	Holiday Home/Apartments ⁷
Office Ancillary to Permitted Use	Open Space	Recreational/Sports Facility
Research and Development ¹⁴	Residential ⁴	Restaurant/Café ¹³
Veterinary Clinic ²¹	Campsite ²⁵	

Figure 13. GB Land Zoning Objective Extracted from the Development Plan

The proposed development is seeking amendments to 108 no. residential units already permitted on the subject site under Reg. Ref. LRD0057/S3, and as such is considered to be acceptable from a land use zoning perspective.

5.0 ENVIRONMENTAL CONSIDERATIONS

5.1 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 Environmental Consultants has prepared an Appropriate Assessment report for the proposed development. For further information in this regard, please refer to the Appropriate Assessment Screening report prepared by Altamar Environmental Consultants, submitted under separate cover of the application.

6.2 EIAR Screening

This current application seeks amendments to the previously approved house types only, as well as the provision of a new pumping station. The overall development previously permitted is not being materially changed. In this regard, a new Environmental Impact Assessment is not required, noting that an EIA Screening Report was prepared and approved under the parent permission (Reg. Ref. LRD0057/S3). The Planning Authority are invited to refer to that document for further details.

6.0 CONCLUSION

DOWNEY, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this Planning Statement on behalf of our client Golden Port Homes Limited, to accompany a proposed Large-Scale Residential Development (LRD) on lands at Forest Road, Swords, Co. Dublin. The proposed development provides for amendments to a previously permitted development under Reg. Ref. LRD0057/S3.

The proposed amendments relate mainly to a change in house types of 10 no. units only, and the duplex units, with the amendment application also seeking permission for a new underground pumping station with ancillary infrastructure and access. It is important to note that the subject application does not seek to change the overall permitted number of units on site (108 no.), or the overall layout of the development permitted under Reg. Ref. LRD0057/S3.

DOWNEY therefore respectfully request that planning permission be granted for the proposed development.

PART B – STATEMENT OF CONSISTENCY WITH PLANNING POLICY

The following demonstrates that the proposed development is consistent with the relevant national, regional, and local planning policy. This should be read in conjunction with the accompanying detailed documentation prepared by the Design Team.

1.0 NATIONAL PLANNING POLICY

The key provisions of the national planning policy, in regard to that of the proposed development are set out in the following section. These are as follows:

- Project Ireland 2040: National Planning Framework First Revision, 2025
- Project Ireland 2040: National Development Plan 2021-2030 and National Development Plan Review 2025
- Delivering Homes, Building Communities (2025-2030) An Action Plan on Housing Supply and Targeting Homelessness
- Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities 2024
- Planning Design Standards for Apartments (2025)
- Childcare Facilities: Guidelines for Planning Authorities 2001
- Design Manual for Urban Roads and Streets (DMURS)
- Smart Travel: A Sustainable Transport Future
- Cycle Design Manual 2023
- Birds and Habitats Directive – Appropriate Assessment
- The Planning System and Flood Risk Guidelines
- National Adaptation Framework: Planning for a Climate Resilient Ireland 2024
- Climate Action Plan 2025

1.1 Project Ireland 2040: National Planning Framework First Revision, 2025

The Revised National Planning Framework was published on 8th April 2025. It states that *“This Framework is revised and updated to take account of changes that have occurred since it was published in 2018 and to build upon framework that is in place. It is a framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment – from our villages to our cities, and everything around and in between.”*

The Revised NPF goes on to add, *“In the period between 2022 and 2040 it is expected that there will be roughly an extra one million people living in our country. This population growth will require new jobs and new homes. If we fail to plan for this growth and for the demands it will place on our built and natural environment, as well as on our social and economic fabric, then we will certainly fail in our responsibility to future generations of Irish men and Irish women. That responsibility is to ensure their prosperity and happiness in an ever-changing world.”*

The NPF outlines a number of strategies and policy objectives, emphasising upon the issue of compact growth and urban consolidation. Specifically in terms of ‘compact growth’, the NPF targets for up to

40% of all new future housing developments to be within and close to the existing footprint of built-up areas. It seeks to make use of under-utilised land and buildings, including infill, brownfield, publicly owned, vacant sites and that of under-occupied buildings.

The National Planning Framework (NPF) explicitly supports the densification of suburban greenfield sites like the subject site, and includes **National Policy Objective 35**, which states:

“Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.”

From a planning perspective, the following national policy objectives are of particular relevance to this proposal, as they align with the desired pattern of growth and development outlined in the NPF:

National Policy Objective 3: *“Eastern and Midland Region: 470,000 additional people between 2022 and 2040 (c. 690,000 additional people over 2016-2040) i.e. a population of almost 3 million.”*

National Policy Objective 4: *“A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.”*

National Policy Objective 7: *“Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.”*

National Policy Objective 9: *“Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints and ensure compact and sequential patterns of growth.”*

National Policy Objective 12: *“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.”*

National Policy Objective 13: *“Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.”*

National Policy Objective 14: *“Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity, enhanced levels of amenity and design and placemaking quality, in order to sustainably influence and support their surrounding area to ensure progress toward national achievement of the UN Sustainable Development Goals.”*

National Policy Objective 20: *“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”*

National Policy objective 22: *“In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth.”*

National Policy Objective 37: *“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.”*

National Policy Objective 38: *“Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.”*

National Policy Objective 42: *“To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.”*

National Policy Objective 43: *“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”*

National Policy Objective 45: *“Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development.”*

As outlined in the Revised National Planning Framework (NPF), the overarching goal is to guide public and private investment in a manner that promotes opportunity, enhances quality of life, and protects the environment—from rural villages to major urban centres. A key pillar of the NPF is the targeted consolidation of growth within existing built-up areas, promoting compact, sustainable settlement patterns. It is respectfully considered that this development is consistent with these policies of the NPF as it will create a new residential community on zoned and serviced lands within the County Town of Swords. Green Infrastructure and nature-based SuDS have been designed into the scheme and townland boundaries, and biodiversity is being protected. Active travel is also being facilitated through the creation of new cycle lanes and pedestrian footpaths and connectivity to adjoining lands. It is also noted that the principle of development has already been permitted on site, with 108 no. units granted under Reg. Ref. LRD0057/S3. With the subject application seeking amendments to some house types, and the provision of a new underground pumping station, it is considered that the subject application remains consistent with the overall objectives of the National Planning Framework.

Aligned with this national direction, the Fingal County Development Plan 2023–2029 identifies Swords as a Key Town within the Eastern and Midland Region, in accordance with the Regional Spatial and Economic Strategy (RSES). Notably, this reflects Fingal’s long-term vision for Swords to evolve into the County Town and, ultimately, a city of regional significance. Central to this vision is a strategy of compact growth, focused urban expansion, and the sequential development of Swords, underpinned by high-quality placemaking and public realm enhancements.

The proposed development represents a high-quality residential scheme located within an established and predominantly residential area of Swords. The scheme will deliver a total of 108 residential units in the form of houses, duplex units and apartments at a density of 51 units per hectare, which has already been considered appropriate under Reg. Ref. LRD0057/S3.

On this basis, DOWNEY is of the considered opinion that the proposed development is fully consistent with the objectives of the National Planning Framework, particularly those relating to compact

growth, sustainable settlement patterns, and the efficient use of serviced, well-connected urban land. These conclusions are further supported by regional and local policy objectives, which are addressed in the subsequent sections of this report.

1.2 Project Ireland 2040: The National Development Plan 2021-2030 and National Development Plan Review 2025

The National Development Plan (NDP) sets out the investment priorities that will underpin the successful implementation of the NPF. This will guide national, regional, and local planning and investment decisions in Ireland over the next two decades to cater for an expected population increase of over 1 million people.

Resolving the systemic factors underlying the current housing crisis is at the heart of the NDP and reflecting this, housing and sustainable urban development is a priority for the National Development Plan. In this regard, the NDP states that there is a *“need to provide in excess of half-a-million more homes over the period to 2040 corresponds to a long-term trend of 25,000 new homes every year. A higher level of output is needed in the short to medium-term to respond to the existing deficit that has given rise to the housing crisis.”*

Furthermore, the NDP states that *“the continuation of existing patterns of development accentuates the serious risk of economic, social, and environmental unsustainability through, for examples, placing more distance between where people work and where people live, and increasing energy demand. The NPF highlights the urgent requirement for a major uplift of the delivery of housing within the existing built-up areas of cities and other urban areas. It has a particular focus on brownfield development, targeting derelict and vacant sites that may have been developed before but have fallen into disuse.”*

There are a number of strategic outcomes identified within the NDP which support the proposed development at the subject site. Such outcomes include:

National Strategic Outcome 1: Compact Growth – *“This outcome aims to secure the sustainable growth of more compact urban and rural settlements supported by jobs, houses, services, and amenities, rather than continued sprawl and unplanned, uneconomic growth. This requires streamlined and co-ordinated investment in urban, rural, and regional infrastructure by public authorities to realise the potential of infill development areas within our cities, towns, and villages. This will give scope for greater densities that are centrally located and, in many cases, publicly owned, as well as bringing life and economic activity back into our communities and existing settlements. Creating critical mass and scale in urban areas with enabling infrastructure, in particular increased investment in public and sustainable transport and supporting amenities, can act as crucial growth drivers. This can play a crucial role in creating more attractive places for people to live and work in, facilitating economic growth and employment creation by increasing Ireland’s attractiveness to foreign investment and strengthening opportunities for indigenous enterprise”.*

National Strategic Outcome 4: Sustainable Mobility – *“The expansion of attractive and sustainable public transport alternatives to private based car transport will reduce congestion and emissions and enable the transport sector to cater in an environmentally sustainable way*

for the demands associated with longer term population and employment growth envisaged under the NPF. Furthermore, the provision of safe alternative active travel options such as segregated cycling and walking facilities can also help alleviate congestion and meet climate action objectives by providing viable alternatives and connectivity with existing public transport infrastructure”.

The proposed Large-Scale Residential Development (LRD) at the subject site, is seeking amendments to the development of 108 no. residential units in a mix of apartments, duplexes, and houses permitted under Reg. Ref. LRD0057/S3. As such the development supports the delivery of key objectives set out in the National Development Plan (NDP) and the National Planning Framework (NPF), which together guide Ireland’s national planning and investment decisions to 2040 and beyond.

The NDP identifies housing delivery and sustainable urban development as central priorities, underpinned by a recognition of the need to deliver in excess of 500,000 new homes nationally to address both existing housing deficits and future population growth. This requires a sustained increase in housing output, particularly in urban areas, and a fundamental shift away from unsustainable development patterns that have historically contributed to sprawl, congestion, and inefficient land use.

In light of the above, the proposed development is demonstrably aligned with the investment priorities and policy objectives of the National Development Plan (NDP) and the National Planning Framework (NPF). It supports compact, sustainable urban growth in a designated Key Town, contributes meaningfully to addressing the national housing need, and promotes a shift towards active and sustainable travel, as per the development permitted under Reg. Ref. LRD0057/S3

The proposal represents a considered and appropriate response to national, regional, and local policy frameworks and will help facilitate the long-term development vision for Swords as a compact, connected, and vibrant urban centre.

1.3 Delivering Homes, Building Communities (2025-2030) An Action Plan on Housing Supply and Targeting Homelessness

Published on 13th November 2025, the Government has introduced a new housing plan to replace Housing for All. The new plan “Delivering Homes, Building Communities”, aims to speed up the delivery of new homes and tackle homelessness, building on the progress of the Housing for All plan. The Plan aims to deliver 300,000 new homes by the end of 2030, which includes 72,000 social homes and 90,000 affordable housing supports. The Plan is also backed by an unprecedented investment in water, energy, and transport infrastructure to assist in the delivery of these houses, with a total of €9 million capital funding for housing in 2026 alone.

The Plan is based on two key pillars:

1. Activating the supply of 300,000 more homes; and
2. Supporting people to have a home of their own.

Pillar 1: *“will be achieved through activating more land, providing more housing-related infrastructure, securing more development finance for home building, addressing viability challenges particularly*

those seen in apartment delivery, increasing the adoption of Modern Methods of Construction, increasing the skills in the residential construction sector and working toward ending dereliction and vacancy.” The Plan also identifies four key priorities to activate Pillar 1, which are as below:

1. Ensure a strong pipeline of zoned and serviced land is available.
2. Create the conditions to attract the required investment.
3. Increase skills and support the adoption of Modern Methods of Construction in the residential construction sector.
4. Work toward ending dereliction and vacancy.

With regards to Pillar 2, the Plan *“details how Government will support people. It sets out a series of key actions that work towards ending homelessness, support affordability and address the housing needs of people as they progress through life. In partnership with local authorities, the LDA and AHBs, the Plan will address the needs of the most vulnerable in our communities, make buying and renting homes more affordable and support the development of villages, towns and cities across the country.”*

The four key priorities to activate Pillar 2, are as follows:

1. Focus on ending homelessness, deliver homes for older people and support social inclusion.
2. Deliver an average of 12,000 new social homes every year over the lifetime of the Plan.
3. Promote affordable homeownership, protect renters and make buying and renting homes more affordable.
4. Invest in the built environment of towns, villages and cities across the country to enhance community well-being.

The Plan concludes noting that in order to achieve the objective set out, a “joined-up, long-term national effort” is required, noting that it is a shared responsibility to deliver on these targets. In light of the above, it is considered that the potential development of the lands as currently proposed would be consistent with the requirements of this housing plan.

Under Reg. Ref. LRD0057/S3, permission was granted for the construction of 108 no. residential units, including a mix of housing, duplexes, and apartments to our client, and the applicant of the subject application Golden Port Homes Limited. The applicant is now seeking permission for minor associated amendments to the permitted development, to enhance it’s overall design function and viability, there are no changes to the permitted number of units, 108. The applicant has already begun the process of submitting the relevant pre-commencement compliance submissions relating to application Reg. Ref. LRD0057/S3, and it is the clear intention of our client to implement the permitted development.

1.4 Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

The main objective of the guidelines is to provide policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements. They build on and update previous guidance to take account of current Government policy and economic, social, and environmental considerations. There is a

renewed focus in the Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality urban design and placemaking to support sustainable and compact growth.

The aim of the Guidelines is to set out the key planning principles which should be reflected in development plans and local area plans, and which should guide the preparation and assessment of planning applications for residential developments in urban areas. These Guidelines support higher residential densities particularly for sites within town centre locations and along public transport corridors, as it states: *“To achieve compact growth, it will also be necessary to increase the scale of new buildings in all parts of our cities and towns, with highest densities at the most central and accessible urban locations, particularly in city centres and close to public transport nodes and interchanges.”*

According to Table 3.1 of the Guidelines, the subject site falls within **City – Suburban/Urban Extension of Dublin Metropolitan Area (MASP)**, and thus, it can potentially accommodate a density of 40-80dph with densities of up to 150dph open for consideration at “accessible” suburban/urban extension locations.

The Compact Settlements Guidelines (section 3.4.2) emphasise the importance of a context-based approach when considering higher density development setting out that *“the evaluation of impact on local character should focus on the defining characteristics of an area, including for example, the prevailing scale and mass of buildings, urban grain and architectural language, any particular sensitivities, and the capacity of the area for change. While it is not necessary to replicate the scale and mass of existing buildings, as most urban areas have significant capacity to accommodate change, it will be necessary to respond in a positive and proportionate way to the receiving context through site responsive design”*.

This has been taken into context of the development design and evolution upon project commencement. More recently, under Reg. Ref. LRD0057/S3, permission was granted by Fingal County Council for 108 no. residential units on site, which equates to a net density of 51 units per hectare. This has been accepted by Fingal County Council and deemed compliant, and as such, within the subject amendment application, there is no change proposed to the overall number of units or to the density of the development.

The Guidelines also sets out 4 no. SPPR’s to assist in the delivery of new development.

“SPPR 1 – Separation Distances:

It is a specific planning policy requirement of these Guidelines that statutory development plans¹⁵ shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a separation distance of at least 16 metres between opposing windows serving habitable rooms¹⁶ at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows

servicing habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.

There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.”

It is submitted that the proposed development through proposed built form and siting has met with and exceeds the requirements of SPPR 1 in regard to sufficient separation distances, with further details provided in the architectural pack prepared by Crawford Architecture and submitted under separate cover.

“SPPR 2 – Minimum Private Open Space Standards for Houses:

It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:

- 1 bed house 20 sq.m
- 2 bed house 30 sq.m
- 3 bed house 40 sq.m
- 4 bed + house 50 sq.m

A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1 below). The planning authority should be satisfied that the compensatory semi-private open space will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves.

Apartments and duplex units shall be required to meet the private and semi-private open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).

For building refurbishment schemes on sites of any size or urban infill schemes on smaller sites (e.g. sites of up to 0.25ha) the private open space standard may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and proximity to public open space.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.”

As per the relevant drawings and documentation submitted by Crawford Architecture, all proposed house designs meet and exceed the above requirements for private open space.

Public Space is also noted of import, for which refers to open spaces that form part of the public realm within a residential development. All residential developments are required to make provision for a reasonable quantum of public open space, with a need to focus on overall quality, amenity value and biodiversity value of said public open spaces. Notably, these spaces should integrate and protect natural features of significance and green and blue infrastructure corridors within the site and should support the conservation, restoration and enhancement of biodiversity. The public open spaces should also form an integral part of the design and layout of a development and provide a connected hierarchy of spaces, with suitable landscape features, including seating and provision for children’s play.

It is submitted that the proposed development has met with and exceeds the requirements of SPPR 2 in regard to all proposed units availing of suitable private open and communal spaces, with further details provided in the architectural pack including the HQA prepared by Crawford Architects, submitted under separate cover.

“SPPR 3 – Car Parking:

It is a specific planning policy requirement of these Guidelines that:

- (i) In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling.*
- (ii) In accessible locations, defined in Chapter 3 (Table 3.8) car- parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling.*
- (iii) In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling. Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays*

assigned for use by a car club, designated short stay on-street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.

This SPPR will not apply to applications made in a Strategic Development Zone until the Planning Scheme is amended to integrate changes arising from the SPPR. Refer to Section 2.1.2 for further detail.”

Accordingly, the permitted development under Reg. Ref. LRD0057/S3, permission was granted for an overall total of 96 no. car parking spaces. The level of parking is just below the maximum requirement that would be set by the Guidelines and the subject amendment application is not seeking permission for any change in the total number of car parking spaces.

“SPPR 4 – Cycle Parking & Storage:

It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors.

The following requirements for cycle parking and storage are recommended:

- (i) *Quantity – in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/ enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers.*
- (ii) *Design – cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.”*

It is submitted that the proposed development has met with and exceeds the requirements of SPPR 4. The subject amendment application is not seeking any changes to the total bicycle parking spaces permitted under Reg. Ref. LRD0057/S3. Further details are provided in the Traffic and Transport Assessment by Barrett Mahony Consulting Engineers (BMCE) and submitted under separate cover.

As set out above, it is respectfully submitted that the proposed development complies with each of the SPPR’s set out in the Compact Settlement Guidelines.

Furthermore, as outlined in **Policy & Objectives 5.1** of the Compact Settlement Guidelines:

“It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10%

of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances.

Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.

In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led basis, having regard to the overall approach to public park provision within the area.

In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas."

The proposed development includes a total of 2,673sq.m. of public open space, distributed across 2 key areas throughout the residential zoned part of the site. This represents 12% of the developable site area, exceeding the requirements set out in both the Development Plan and the Compact Settlements Guidelines. This excludes the large Class 1 public park, 23,107 sq. m. in size, that will be located on the Greenbelt zoned part of the site to the south of the access road.

From a qualitative standpoint, the proposed public open spaces have been strategically sited and designed so to integrate with one another through pedestrian paths, creating an active network of green spaces. This design not only enhances the connectivity within the development but also allows for the development to tie in with that of the surrounding area.

This approach toward the subject site's green spaces, significantly contributes to and promotes green infrastructure, reinforcing the broader environmental and community objectives of Swords.

With respect to the above, DOWNEY are of the considered opinion that the proposed development represents a development that has been carefully considered and appropriately designed through a collaborative process with the Council and giving full considerations to relevant planning policy while being mindful of its wider context. For further details on the proposed development's consistency with the Criteria Assessment, please refer to the Architects Plans, Design Statement and HQA prepared by Crawford Architecture and submitted under separate cover of the application.

1.5 Planning Design Standards for Apartments 2025

The 'Sustainable Urban Housing: Design Standards for New Apartments' build on the content of the 2015 and 2020 apartment guidance. The Guidelines constitute Ministerial Guidelines under Section 28 of the Planning and Development Act 2000 (as amended) and all planning authorities are to have regard to these Guidelines as they take precedence over any conflicting policies. The Guidelines state that it is "critical to ensure that apartment living is an increasingly attractive and desirable housing option for a range of household types and tenures."

The Guidelines state that Ireland is a long way behind European averages in terms of the numbers of households living in apartments, especially in our cities and larger towns. Given the gap between Irish

and European averages in numbers of households living in apartments and the importance of addressing the challenges of meeting the housing needs of a growing population in our key cities and towns and by building inwards and upwards rather than outwards, apartments need to become the norm for urban housing solutions.

The Guidelines also have specific planning policy requirements (SPPRs), which include:

“Specific Planning Policy Requirement 1 – (a) With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.

(b) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.”

Specific Planning Policy Requirement 2 – The following minimum apartment floor areas shall apply, and statutory plans shall not specify minimum floor areas that exceed the minimum floor areas set out below:

- Studio apartment (1 person) 32 sq. m
- 1-bedroom apartment (2 persons) 45 sq. m
- 2-bedroom apartment (3-persons) 63 sq. m.
- 2-bedroom apartment (4 persons) 73 sq. m
- 3-bedroom apartment (4-persons) 76 sq. m.
- 3-bedroom apartment (5 persons) 90 sq. m

Specific Planning Policy Requirement 3 -

“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 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.

(ii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.”

DOWNEY note that the subject amendment application is not seeking permission for any changes to the permitted apartment development under Reg. Ref. LRD0057/S3, with amendments only being sought to the design of some of the housing units on site. As such is requested that planning permission be granted.

1.6 Childcare Facilities: Guidelines for Planning Authorities 2001

Government policy on childcare seeks to expand the availability of childcare places and facilities while enhancing the overall quality of services provided to the community. The *Childcare Facilities Guidelines for Planning Authorities* offer a structured framework to assist both local authorities in the preparation of development plans and the assessment of planning applications, as well as developers and childcare providers in shaping appropriate development proposals.

In the context of residential development, the *Childcare Facilities Guidelines for Planning Authorities* (2001) set out a general benchmark of one 20-place childcare facility per 75 dwellings. However, the application of this threshold must be informed by the existing distribution of childcare services in the locality and the emerging demographic profile of the area in which new housing is proposed.

These recommendations should also be interpreted in conjunction with the more recent guidance set out in *Sustainable Urban Housing: Design Standards for New Apartments* (2023), which states:

“Notwithstanding the Department’s Planning Guidelines for Childcare Facilities, which are currently subject to review and recommend the provision of one childcare facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision in apartment scheme should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile for the area.”

Importantly, the Apartment Guidelines further clarify that:

“One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms”.

In the case of the subject development, when one-bedroom units are excluded, a total of 71 units remain which could reasonably be expected to accommodate families and, by extension, generate demand for childcare services.

As per Condition 2 attached to the parent permission of the subject site, Reg. Ref. LRD0057/S3, the applicant is required to provide a creche facility on site. As such, the applicant is preparing the necessary compliance submissions for approval, to provide a creche facility within the overall development.

1.7 Design Manual for Urban Roads and Streets (DMURS)

The Design Manual for Urban Roads and Streets (DMURS) 2013 and as updated in 2023 sets out design guidance and standards for constructing new and reconfiguration of existing urban roads and streets. It also sets out practical design measures to encourage more sustainable travel patterns in urban

areas. The transport drawings and documentation prepared by Barrett Mahony Consulting Engineers (BMCE) and submitted under separate cover, provide further details in respect of the compliance of the proposed development with the provision of DMURS. The subject application is not seeking permission for any changes to the key road network and design already permitted under Reg. Ref. LRD0057/S3 and as such it is requested that permission be granted.

1.8 Smarter Travel: A Sustainable Transport Future

The Smarter Travel: A Sustainable Transport Future states that *“to achieve the vision of a sustainable transport system, individual lifestyles will have to change and collectively we will have to work progressively on a range of solutions which deal with apparently conflicting goals: economic growth, reduced emissions, less use of motorised transport and better accessibility.”*

The five key goals of this transport policy are as follows:

- *Improve quality of life and accessibility to transport for all and, in particular, for people with reduced mobility and those who may experience isolation due to lack of transport.*
- *Improve economic competitiveness through maximising the efficiency of the transport system and alleviating congestion and infrastructural bottlenecks.*
- *Minimise the negative impacts of transport on the local and global environment through reducing localised air pollutants and greenhouse gas emissions.*
- *Reduce overall travel demand and commuting distances travelled by the private car.*
- *Improve security of energy supply by reducing dependency on imported fossil fuels.*

It is considered that the proposed development complies with Smarter Travel: A Sustainable Transport Future. The proposed development provides sustainable housing within the Swords area and is located close to numerous Dublin Bus services (routes 102, 41B, 41C, 505 series), and is located approximately 1.5km from the future Fosterstown Metrolink Station, with additional connectivity planned via the BusConnects L81 route. It is also worthy of mention that the proposed scheme will facilitate permeability from the subject site into that of the northern lands, further facilitating the connectivity of Swords.

In light of the above, it is considered that the proposed development is consistent with this national transport policy and will assist in its implementation.

1.9 Cycle Design Manual 2023

Published in September 2023, the new Cycle Design Manual supersedes the National Cycle Design Manual, 2011. The Cycle Design Manual draws on the experience of delivering cycling infrastructure across Ireland over the last decade, as well as learning from international best practice, and has been guided by the need to deliver safe cycle facilities for people of all ages and abilities.

The manual includes a number of new types of infrastructure such as protected junctions, Dutch style cycle-friendly roundabouts, and parallel crossings which are commonly used in other countries and will now become an option for cycle infrastructure in Ireland. It should be noted that some newer features will require amendments to supporting Regulations and the Traffic Sign Manual so designers should consult with the relevant approving authority prior to installing any of the newer features to

ensure applicability of designs/solutions. It is intended that manual will be a live document which will be updated and expanded as required to reflect emerging best practice and feedback from user experience of the manual.

As outlined in the Cycle Design Manual, for cycle infrastructure to cater for the needs of people who currently cycle and to also attract new cycle users to the network, there are five main requirements which designs should fulfil under the headings of:

- i. Safety
- ii. Coherence
- iii. Directness
- iv. Comfort
- v. Attractiveness

It is submitted that the proposed scheme has been thoughtfully designed with a strong emphasis on providing high-quality cycling infrastructure that prioritises safety, coherence, directness, comfort, and attractiveness. The proposed street network and open space provision have been designed with consideration to cycle use and so to ensure for a coherent and direct cycling experience throughout the development. This infrastructure not only enhances the safety and comfort of cyclists but also adds to the overall attractiveness of the scheme, encouraging greater use of cycling as a mode of transport. Additionally, appropriate cycle parking spaces have been strategically located to serve both the residential and non-residential components of the development, further supporting a safe and convenient cycling environment.

For more detailed information on the cycling infrastructure and its design principles, please refer to the enclosed Traffic and Transport Assessment prepared by Barrett Mahony Consulting Engineers (BMCE), along with the proposed Site Layout prepared by Crawford Architecture, both of which are included within this LRD application, as well as the information submitted and deemed acceptable under the previously permitted development, Reg. Ref. LRD0057/S3.

1.10 Birds and Habitats Directive – Appropriate Assessment

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 Ecological Consultant has prepared a report for Screening for Appropriate Assessment together with an Ecological Impact Assessment for the proposed development. For further information in this regard, please refer to both documents for which have been submitted under separate cover.

1.11 The Planning System and Flood Risk Guidelines 2009

These Guidelines require the planning system at all levels to avoid developments in areas at risk of flooding, particularly floodplains, except where there are no suitable alternative sites available in areas at lower risk that are consistent with the objectives of proper planning and sustainable development. Where such development has to take place, in the case of urban regeneration for example, the type of development has to be carefully considered, and the risks should be mitigated and managed through location, layout, and design of the development to reduce flood risk to an

acceptable level. Applicants are advised to carefully examine their development proposals to ensure consistency with the requirements of these Guidelines including carefully researching whether there have been instances of flooding or there is the potential for flooding on specific sites and to carry out a site-specific flood risk assessment.

In accordance with these Guidelines, a flood risk assessment has been carried out at the subject site by Barrett Mahony Consulting Engineers (BMCE) to support the parent permission, Reg. Ref. LRD0057/S3 which confirms that as a result of the proposed mitigation measures, the residual risk of flooding from any source is low. Therefore, it is considered that the proposed development is consistent with the requirements of this national flood risk management policy.

For further information in this regard, we respectfully invite the Council to refer to the Flood Risk Assessment report prepared by Barrett Mahony Consulting Engineers and submitted with the previously permitted application, Reg. Ref. LRD0057/S3.

1.12 National Adaption Framework: Planning for a Climate Resilient Ireland 2024

The National Adaptation Framework: Planning for a Climate Resilient Ireland (2024), prepared by the Department of the Environment, Climate and Communications, serves as a comprehensive guide for Ireland's approach to climate change adaptation. This framework outlines the national strategy for integrating adaptation measures across various sectors and local authorities, aiming to reduce the nation's vulnerability to the adverse effects of climate change while capitalising on potential positive outcomes. It emphasises a pathway planning approach to accommodate various future warming scenarios and promote resilience in infrastructure, ecosystems, and communities. The framework underscores the importance of smarter, faster, and transformative adaptation actions, encouraging a proactive and coordinated response to the challenges posed by climate change.

As outlined in the National Framework, new developments in Ireland are subject to stringent policies to mitigate their potential impact on the climate, ensuring they align with the goals of reducing greenhouse gas emissions and enhancing climate resilience. The planning policy emphasises the necessity for all new developments to integrate climate adaptation and mitigation strategies, recognising that the construction and operation of new infrastructure can significantly contribute to emissions and environmental degradation if not carefully managed.

The policy highlights the importance of "Just Resilience", ensuring that adaptation measures not only address climate change but also do so in a way that is equitable and inclusive, particularly for vulnerable populations. This approach mandates that new developments must consider the socio-economic impacts of climate change and avoid exacerbating existing inequalities. The framework also encourages developments to employ nature-based solutions and sustainable practices that contribute to both mitigation and adaptation, fostering long-term sustainability and resilience in the face of climate change.

It is submitted that the proposed development has been meticulously planned with careful consideration of its potential environmental and climate impacts. The design aims to balance the urgent need for housing in the area with an environmentally sensitive approach, ensuring that development proceeds in a sustainable and responsible manner. Additionally, the proposed

development is accompanied by an AA Screening, which we respectfully urge the Council to review for a comprehensive understanding of the measures taken to mitigate environmental impacts.

1.13 Climate Action Plan 2025

In accordance with the Climate Action and Low Carbon Development Act 2015, this Climate Action Plan, specifies the national strategy for the application of adaptation measures in different sectors and by local authorities in their administrative areas in order to reduce the vulnerability of the State to the negative effects of climate change and to avail of any positive effects that may occur. This Plan and its successors will set out the context to ensure local authorities, regions and key sectors can assess the key risks and vulnerabilities of climate change, implement climate resilience actions, and ensure climate adaptation considerations are mainstreamed into all local, regional, and national policy making.

The Climate Action Plan 2025 recognises that Ireland is making steady progress on our climate, however, it is also notes that significant improvements are needed to ‘*change Ireland for the better*’. The Plan highlights the ‘Six Vital High Impact Sectors’, which are as follows:

1. Powering Renewables.
2. Building Better.
3. Transforming how we travel.
4. Making family farms more sustainable.
5. Greening business and enterprise.
6. Changing our land use.

The Plan warns that it is ‘*essential that we act now to increase the rate of decarbonisation activities across all sectors of the economy.*’ This will only be achieved through a change in lifestyles and business models, along with building effective and efficient neighbourhoods.

2.0 REGIONAL PLANNING POLICY

The key provisions of the regional planning policy as it relates to the proposed development are now set out in the following sections. The key regional policy of relevance includes:

- Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031; and,
- Transport Strategy for the Greater Dublin Area 2022-2042.

2.1 Regional Spatial and Economic Strategy Eastern and Midland Regional Assembly (2019-2031)

The ‘Regional Spatial and Economic Strategy’ hereafter referred to as RSES was published on the 26th of June 2019. Contained within this document are policies for which contribute to the economic growth of the region over the life of the plan to 2031.

Specifically, the RSES identifies regional assets, opportunities, pressures, and constraints and provides a framework for investment to better manage spatial planning and economic development throughout the Eastern and Midland Region. The RSES is thus tasked with the development of planning policy for future housing needs in the region upon consideration of land, resources, environment, and infrastructure capacity.

Notably, many of the policies and objectives of the RSES complement those of the NPF, notably in respect of sustainable growth and consolidated development. Further to this, the RSES also notes the following Regional Policy Objective (RPO's) that pertain to NPF targets for which are considered applicable in regard to that of the proposed development:

- *“RPO 3.2: Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built-up area of Dublin city and suburbs and a target of at least 30% for other urban areas.”*
- *“RPO 3.3: Local authorities shall, in their core strategies, identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for new Apartments Guidelines’ and the ‘Urban Development and Building Heights Guidelines for Planning Authorities’.”*
- *“RPO 5.4: Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing: Design Standards for New Apartments’ Guidelines and ‘Urban Development and Building Heights Guidelines for Planning Authorities’.”*
- *“RPO 5.5: Future residential development supporting the right housing tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin City and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall settlement strategy for the RSES. Identification of suitable residential sites shall be supported by a quality site selection process that addresses environmental concerns.”*
- *“RPO 9.10 In planning for the creation of healthy and attractive places, there is a need to provide alternatives to the car and to prioritise and promote cycling and walking in the design of streets and public spaces. Local authorities shall have regard to the Guiding Principles for ‘Healthy Placemaking’ and ‘Integration of Land Use and Transport’ as set out in the RSES and to national policy as set out in ‘Sustainable Residential Development in Urban Areas’ and the ‘Design Manual for Urban Roads and Streets (DMURS)’.”*
- *“RPO 10.15: Support the relevant local authorities (and Irish Water where relevant) in the Region to improve storm water infrastructure to improve sustainable drainage and reduce the risk of flooding in the urban environment and in the development and provision at a local level of Sustainable Urban Drainage solutions.”*

The proposed development will provide amendments to the permitted 108 no. residential units within the area of Swords, granted under Reg. Ref. LRD0057/S3. Notably, the proposed development will assist the government in achieving its objectives in terms of the creation of new appropriately located,

sustainable residential dwellings. While also complying with all relevant policies and guidelines for which can be defined by three key principles: 1) targeted development within or in close proximity to established urban areas, 2) facilitating the transition to more sustainable modes of transportation such as walking, cycling, and public transport, and 3) enabling urban infill development. The current planning policy paradigm actively encourages the optimal use of underutilised land to accommodate higher-density housing, thereby leveraging existing infrastructure and public transport networks.

The subject application is seeking permission for changes to the house types of some houses within the scheme, and also for the provision of a new underground pumping station. Following the granting of permission under LRD0057/S3, engagement took place with Uisce Eireann regarding the connection agreements. At this point, it became evident that a pumping station will be required to connect the permitted housing development to the existing foul water system on Forest Road. As such, this application is being brought forward to allow for the delivery of the required housing within the subject site.

2.2 Transport Strategy for Greater Dublin Area 2022-2042

This transport strategy provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA). The purpose of the Strategy is: *“To contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods.”*

The core of the strategy seeks the better integration of land use planning and transport planning. This can be achieved through the consolidation of development into higher order centres. In terms of the provision of housing, the strategy seeks to directly enable the sustainable development of strategically important residential sites, particularly in Metropolitan Dublin, where demand is highest.

The proposed development seeks to develop a strategic site within close distance of multiple bus networks, as well as actively encouraging the modal shift towards more sustainable and active modes of transport, including cycling and walking. It is therefore requested that planning permission be granted for the subject application.

3.0 LOCAL PLANNING POLICY

The subject site is located in the southern part of Fingal County and, as such, is guided by the policies and objectives set out in the **Fingal County Development Plan 2023–2029**. This section of the report outlines the relevant local planning policy framework applicable to both the site and the proposed development, with reference to the provisions contained within the current Development Plan.

3.1 Fingal County Development Plan (2023-2029)

The **Fingal County Development Plan 2023–2029** serves as the overarching spatial planning framework for the Fingal area within the Dublin region. The Plan sets out a comprehensive vision for the sustainable development of Fingal. It seeks to enhance the county’s social, economic, environmental, and cultural assets in an integrated and balanced manner.

3.1.1 Land Use Zoning

Under the current Fingal Development Plan, the site is subject to 2 no. land use zoning:

1. The northern portion of the site is zoned as RS – Residential.

The objective of RS zoned land is to: *“Provide for residential development and protect and improve residential amenity.”*

While the vision for RS zoned land is to: *“Ensure that any new development in existing areas would have a minimal impact on and enhance existing residential amenity.”*

Within this zoning, the following uses are considered Permitted in Principle:

*“Bed & Breakfast, Childcare Facilities, Community Facility, Education, Guest House, Office Ancillary to Permitted Use, Open Space, **Residential**, Residential Care Home/ Retirement Home, Retirement Village, Sheltered Accommodation, Traveller Community Accommodation, Utility Installations.”*

As per the parent permission of this application, Reg. Ref. LRD0057/S3, all residential development shall be located on the RS zoned land, and as such this is considered acceptable.

2. It is noted that the portion of the lands is zoned as “GB – Greenbelt”.

The objective of GB zoned land is to: *“Protect and provide for a Greenbelt”*

While the vision for GB zoned land is to: *“Create a rural/urban Greenbelt zone that permanently demarcates the boundary (i) between the rural and urban areas, or (ii) between urban and urban areas. The role of the Greenbelt is to check unrestricted sprawl of urban areas, to prevent coalescence of settlements, to prevent countryside encroachment and to protect the setting of towns and/or villages. The Greenbelt is attractive and multifunctional, serves the needs of both the urban and rural communities, and strengthens the links between urban and rural areas in a sustainable manner. The Greenbelt will provide opportunities for countryside access and for recreation, retain attractive landscapes, improve derelict land within and around towns, secure lands with a nature conservation interest, and retain land in agricultural use. The zoning objective will have the consequence of achieving the regeneration of undeveloped town areas by ensuring that urban development is directed towards these areas.”*

Within this zoning, the following uses are considered Permitted in Principle:

*“Agricultural Buildings, Agri-Tourism, Bed and Breakfast, Boarding Kennels, Burial Grounds, Childcare Facilities, Community Facility, Farm Shop, Golf Course Guest House, Health Practitioner, Holiday Home/Apartments, Office Ancillary to Permitted Use, **Open Space**, Recreational/Sports Facility, Research and Development, Residential, Restaurant/Café, Veterinary Clinic, Campsite”*

Within the subject amendment application, as per the parent permission, the lands zoned GB – Green Belt are included within the application boundaries to provide for Class 1 Open Space provision, including SuDS provisions, as well as the proposed underground pumping station

As such, it is therefore submitted that the subject application is considered acceptable and compliant with the land use zoning.

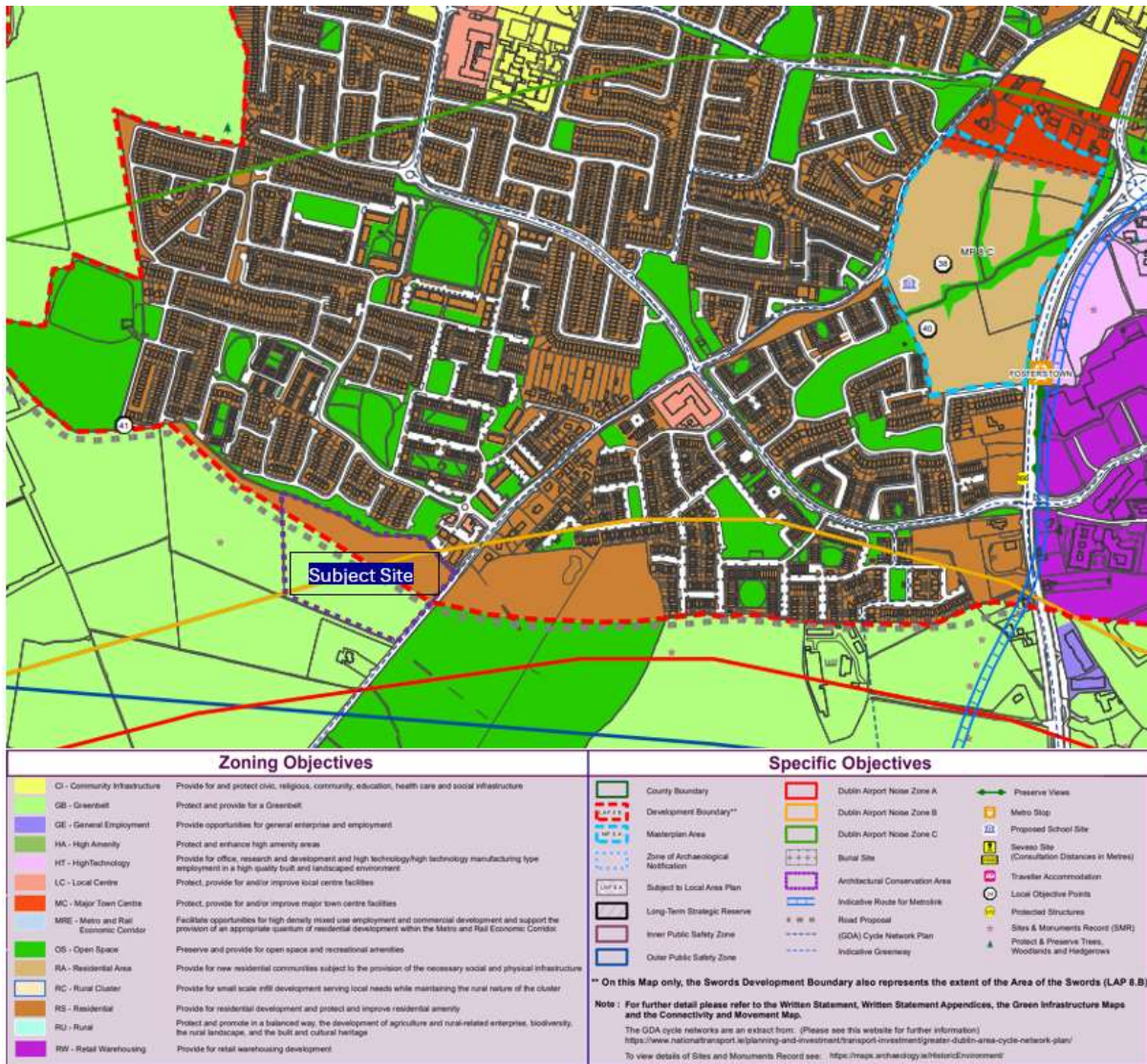


Figure 14. Land Use Zoning Map Extracted from the Development Plan (application site outlined in purple).

3.1.2 Core Strategy & Settlement Strategy

The purpose of the Core Strategy is to guide the spatial direction of future development and regeneration in the County in line with the principles of compact growth with a key objective to ensure that the quantum and location of development is consistent with National and Regional policy.

The vision of the Fingal Development Plan is to grow the county in a long-term sustainable way to ensure the County continues to develop as a series of well-served, well-connected towns and communities and a low carbon economy. The Plan states that, “in addressing the manner in which the County will grow, we must be ever cognisant of climate change impacts and ensure that Fingal’s growth strategy is underpinned by sustainable land management practices which result in the compact and consolidated development of existing urban and rural settlements. Adhering to a clearly focused settlement hierarchy which is in line with a wider regional strategy will ensure we can achieve balanced

growth within Fingal and provide for a network of settlements which are resilient, people focused and sustainable into the future.”

As outlined in the Development Plan, *“Fingal County Council will continue to pursue the goals of the NPF of consolidation of Dublin City through the compact development of the Dublin City and Suburbs area within Fingal”*.

The proposed development will form the continued natural extension to Swords Towns development boundary ensuring sustainable development on land well serviced and connected. The subject amendment application will not provide any increase in the number of units permitted under Reg. Ref. LRD0057/S3 (108 no. units) and as such remains compliant with the core strategy of the Development Plan

3.1.3 Sustainable Placemaking and Quality Homes

In terms of sustainable communities and urban design in residential developments, the Development Plan states that, *“healthy placemaking seeks to promote quality of life through the creation of healthy and attractive places to live, work, visit, invest and study in.”* In this regard, Objective SPQHO1 of the Development Plan aims for creations of sustainable communities, whereas the Council seeks to:

“Ensure that proposed residential development contributes to the creation of sustainable communities and accords with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG 2009 (and any superseding document) and companion Urban Design Manual – A Best Practice Guide, DEHLG 2009 and the Design Manual for Urban Roads and Streets (DMURS) (as revised).”

Moreover, Objective SPQHO2 of the Development Plan sets the Key Principles, seeking to:

“Support development which enhances the quality of the built environment, promotes public health, and supports the development of sustainable, resilient communities. In particular development which supports the following key principles will be supported:

- *Demonstrates compliance with the Guiding Principles for the creation of healthy and attractive places as set out in Healthy Placemaking, Regional Spatial and Economic Strategy (RSES) 2019–2031.*
- *Promotes the development of healthy and attractive places to live, work, socialise and recreate through the delivery of high-quality public realms and open spaces which encourage physical activity and support wellbeing.*
- *Is inclusive of all members of society, all genders, non-binary, or none, irrespective of age, or levels of mobility.*
- *Advocates a universal design approach and is socially inclusive.*
- *Prioritise sustainable, active transport modes by e.g., providing safe cycle lanes and by facilitating public transport services in conjunction with State agencies to meet the needs of the community and to provide access to local services.*
- *Encourages the development of car free neighbourhoods and streets, where appropriate.*
- *Contributes to our climate goals.”*

A Community and Social Infrastructure Audit and a Childcare Provision Assessment had previously been prepared by DOWNEY and deemed acceptable in the application parent permission, Reg. Ref. LRD0057/S3. This assessment provided detailed information and assessment on the existing infrastructure currently serving the Forest Road lands all of which was deemed acceptable. The subject application is seeking permission for change to some house type design within the development, and a new underground pumping station, and as such it is submitted that the development remains compliant with the Sustainable Placemaking and Quality Homes policies of the Fingal County Development Plan.

3.1.4 Climate Action

As outlined in the Development Plan and in order to ensure that all future development aligns with the principles of energy efficiency and the use of efficient and renewable sources of energy, all applications for significant new developments, or for significant refurbishment projects, shall be required to submit a Climate Action Energy Statement as part of any overall design statement for a proposed development. Chapter 14 Development Management Standards refers in further detail. In this regard, **Policy CAP12** of the Development Plan states:

“All new developments involving 15 residential units and/or more than 1,000 sqm of commercial floor space, or as otherwise required by the Planning Authority, will be required to submit a Climate Action Energy Statement as part of the overall Design Statement to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development.”

A Climate Action and Energy Report had previously been prepared by Fallon Design and was submitted under the parent permission application, Reg. Ref. LRD0057/S3, and deemed acceptable. Fingal County Council are invited to refer to this assessment submitted with the previous application, for further details in this regard.

3.1.5 Connectivity and Movement

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 prioritises the following measures:

“Land use policies which reduce demand for travel by bringing people and the activities they need to access closer together.

Improved transport options such as walking, cycling and public transport, designing roads and streets to improve conditions for sustainable modes and encouraging behavioural change to more sustainable modes whilst maintaining appropriate levels of access for general vehicular and freight traffic as required.

Control Measures such as mobility management, parking management and traffic management.”

The Plan notes that the integration of new housing, employment, and services with high-capacity public transport corridors in conjunction with attractive walking and cycling networks and permeable

links to rail and bus stations can reduce the need to travel and support the functioning of a connected and sustainable transport system. This also has the benefit of extending the catchment of sustainable modes to more people and places to support investment in public transport infrastructure. This will enable the implementation of Transit Oriented Development whereby development is consolidated around existing or planned public corridors at a scale or density that supports the viability of high-capacity public transport infrastructure. Notably, the adopting of this approach allows for the facilitation of compact growth, for which is a recurring theme in this Plan and allows for maximising of the opportunities presented by MetroLink, LUAS, and DART+ proposals, as well as the existing and planned bus improvements under BusConnects.

The Development Plan supports high-density, mixed-use development and trip intensive uses integrated with high-quality walking and cycling infrastructure around high-capacity public transport corridors and nodes, through plan frameworks, in order to generate and reinforce sustainable patterns of growth and development in the County. 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 policies and objectives as set out within the Development Plan, for which includes:

- **Policy CMP3:** *“Provide for an integrated approach to land-use and transportation aimed at minimising the demand for travel and prioritising sustainable modes of transport including walking, cycling and public transport.”*
- **Policy CMO3:** *“Support and facilitate high-density, mixed-use development and trip intensive uses along public transport corridors and to ensure the integration of high-quality permeability links and public realm in conjunction with the delivery of public transport services through plan frameworks to generate and reinforce sustainable patterns of compact growth and development in the County.”*
- **Policy CMP31:** *“Prioritise new road developments that underpin new development areas that support sustainable local development.”*
- **Objective CMO43:** *“Ensure that all new roads and streets are designed to enhance insofar as feasible, the County’s Green Infrastructure network by ensuring adequate replacement and additional planting of native species and pollinators and to ensure that SuDS approaches are used to treat surface water run-off.”*
- **Objective CMO44:** *“Roads and Street Proposals and Nature-Based Solutions Incorporate sustainable drainage features and wildlife crossings including bridges and underpasses into the designs for new road infrastructure and where possible, incorporation of such measures into the existing road network.”*
- **Objective CMO45:** *“Design new streets and roads within urban areas in accordance with the principles, approaches and standards contained within DMURS.*
 - *Junctions will be designed with corner radi that reduce pedestrian crossing distances to the minimum allowable by DMURS wherever possible.*
 - *The narrowest carriageway widths allowable by DMURS will be the default standard in Fingal wherever possible.”*

It is submitted that the proposed development is consistent with these policies and objectives. The development of this suitably zoned land within Swords represents a sequential approach to

development for which will ensue connectivity and sustainability which was deemed acceptable by Fingal County Council under Reg. Ref. LRD0057/S3.

3.1.6 Development Management Standards

Chapter 14 of the Fingal 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:

Criteria	Development Plan Requirement & Compliance of the Proposed Development
14.1 Introduction	
<p>14.1.1 Pre-Planning</p>	<p><i>Section 247 of the Planning and Development Act, 2000 (as amended) provides a formal procedure for applicants to seek Pre-Planning guidance from the Planning Authority in relation to their proposed development.</i></p> <p>As outlined within Part A, section 3 of this statement, in line with Section 247 Pre-Planning Consultation of the Planning and Development Act, 2000 (as amended), correspondence took place between Fingal County Council and the Design Team on 30th March 2026 at 11:00 via an Microsoft Teams call.</p> <p>This meeting discussed the principle of the proposed development. Following this meeting, Fingal County Council issued a Section 247 (7) determination letter, confirming the applicant could proceed to application lodgement.</p>
14.2 Key Principles for all Planning Applications	
<p>14.2.1 Universal Access</p>	<p><i>The Council recognises the need for universal equality of access to all aspects of the built and external environment as an essential prerequisite of equal opportunity and the development of an inclusive society. Development proposals, including all new large-scale developments, whether they relate to new buildings, public realm works, changes of use or alterations to existing buildings, must be designed to meet the mobility needs and convenience of all, and incorporate inclusive design principles particularly for vulnerable groups such as the elderly and persons with disabilities.</i></p> <p>It is noted that the design of the proposed development has taken cognisance of people with reduced mobility through the provision of universally accessible dwelling units as well as readily adaptable dwellings. It is submitted that inclusivity and access have fully influenced the design of the scheme, as follows:</p> <ul style="list-style-type: none"> - Building for Everyone, a Universal Design Approach (National Disability Authority) - Universal design Guidelines for Homes in Ireland (National Disability Authority)

	<p>- Technical Guidance Document Part M 2010 (Department of the Environment & Local Government).</p> <p>The proposed scheme is developed with respect to the above-mentioned Guidelines and criteria. For further information in this regard, please refer to the Urban Design Statement prepared by Crawford Architecture and submitted with this LRD application as well as the supporting documentation provided with Reg. Ref. LRD0057/S3.</p>
<p>14.2.2 Healthy Placemaking</p>	<p><i>Healthy placemaking is a combined approach to planning, design and management of public spaces. Good placemaking design will ensure the success of local areas and spaces which will promote activity and provide vitality to an area, positively contributing to public health and wellbeing. It is essential that new developments have regard to good healthy placemaking principles to create climate resilient environments in which people want to engage, resulting in sustainable, well designed, and strong communities.</i></p> <p>The subject application offers a distinct residential development, providing a range of unique environments for residents to enjoy within different areas of the subject site, from play areas, open space, walkways and a multi-purpose pitch for play. Further to this, the development is appropriately lit and overlooked creating safety onto these areas.</p>
<p>14.2.3 Sustainable Design and Climate Action</p>	<p><i>Outlined in the Development Plan, "Design shall optimise natural ventilation and minimise glare and excess solar gain, avoiding large areas of glazing and providing an appropriate balance between solid and void elements... Measures which will allow occupants to adapt to the impacts of climate change are promoted within developments and include natural ventilation, summer shading, openable windows, the incorporation of living roofs and walls, planting and trees, as well as the inclusion of sustainable urban drainage systems (SuDS) and permeable surfaces in adjoining spaces. Measures to mitigate and adapt to the impacts of climate change shall be appropriate to the special and architectural character of an area."</i></p> <p>Efficiency through design has been achieved in the macro scale in terms of layout and site configuration with good attention to detailing of the individual dwelling plan forms providing energy efficiency and reduced lifetime running costs of the overall scheme.</p> <p>Further, efficient planning and design has been brought into the layouts of the individual dwelling units planned, along with the duplex units. For further information, please refer to the Architectural Drawings and Urban Design Statement prepared by Crawford Architecture along with Landscape Drawings prepared by RMDA Landscape Architecture, as well as the Climate and Energy Report, prepared by Fallon Design provided with Reg. Ref. LRD0057/S3.</p>
<p>14.2.4 Safety and Security</p>	<p><i>All residential developments shall refer to Design for Safety and Security guidance contained in the DEHLG Quality Housing for Sustainable Communities – Best Practice Guidelines for Delivering Homes Sustaining Communities 2007.</i></p>

	<p>It is submitted that the arrangement of the dwellings in relation to the road network and public open spaces, creates for ready views onto the public realm, for which in turn ensures passive surveillance and minimisation of exposed blank façades and walls. In addition, the public open spaces are designed in such a way to encourage and support outdoor activities. This is facilitated by appropriate landscape design, providing for permeability of the open spaces, introducing water element in communal spaces, and provision of playground areas within these spaces. For detailed information in this regard, please refer to the Architectural Drawings and Urban Design Statement prepared by Crawford Architecture along with landscape drawings prepared by RMDA Landscape Architecture, all enclosed under separate cover of this LRD application pack.</p>
<p>14.3 Assessments Required for Particular Projects</p>	
<p>14.3.2 Screening for Appropriate Assessment</p>	<p><i>Under Article 6 of the Habitats Directive there is a requirement to establish whether, in relation to plans and projects, if Appropriate Assessment (AA) is required. If, following screening, it is considered that AA is required, the proponent of the plan or project must prepare a Natura Impact Statement.</i></p> <p>Appropriate Assessment has been carried out by Altemar Environmental Consultants. For further information in this regard, please refer to this report prepared by Altemar for which is enclosed under separate cover with this application.</p>
<p>14.4 Sustainable Placemaking and Quality Homes</p>	
<p>14.4.1 Healthy Placemaking: Design Criteria</p>	<p><i>All applications will be required to exhibit high-quality sustainable and inclusive design characteristics, promoting healthy placemaking and wellbeing. This will require that proposed developments demonstrate the manner in which they contribute to active travel, their connectivity to sustainable travel modes, proximity to community infrastructure including recreational facilities and measures to reduce car use, particularly for short journeys. According to Objective DMSO4 of the Development Plan, the Council seeks to ensure:</i></p> <ul style="list-style-type: none"> - <i>The design and layout of a development, the public realm and supporting infrastructure should incorporate Universal Design insofar as is feasible.</i> - <i>Development should be well-designed and attractive to all users including children, people with disabilities, the elderly as well as accommodating cyclists and pedestrians.</i> - <i>The relationship between the proposed scheme and its site context, including between proposed buildings and the adjoining streets, existing site features, pedestrian, and cycle paths, as well as levels of active and passive surveillance should be carefully considered.</i> - <i>There must be meaningful interaction between individual units within the scheme and the public realm.</i> - <i>Creation of areas of distinction where communities can foster a sense of identity, irrespective of scale. " Importance of the public realm as an area for passive and active use where the community can congregate.</i>

	<ul style="list-style-type: none"> - <i>High quality finishing materials to proposed buildings and to the public realms, including seating, lighting, landscaping, tree planting, and green infrastructure.</i> - <i>Consideration of shelter, sunlight/daylight, and shadowing.</i> - <i>The provision of safe environments for all users where the principles of DMURS are utilised and active travel modes such as walking and cycling are favoured over car use.</i> <p>It is submitted that the proposed scheme has been designed and revised with reference to the following:</p> <ul style="list-style-type: none"> - <i>Building for Everyone, a Universal Design Approach (National Disability Authority)</i> - <i>Universal design Guidelines for Homes in Ireland (National Disability Authority)</i> - <i>Technical Guidance Document Part M 2010 (Department of the Environment & Local Government).</i> <p>In addition, the design of public realm is in accordance with the standards and requirements of Design Manual for Urban Roads and Streets (DMURS) whereby priority is given to pedestrians and cyclists. All surfaces within the application boundary will be level to ensure the spaces are accessible for everyone. The footpath will be provided along road network, appropriately designed for all users from parents with buggies to the elderly. Further, universal design requirements have been incorporated within the dwellings design, to ensure lifetime living. For detailed information in this regard, please refer to the Architectural Drawings and Urban Design Statement prepared by Crawford Architecture along with Landscape Drawings prepared by RMDA Landscape Architecture, all of which are enclosed under separate cover of this LRD application as well as the supporting documentation provided with Reg. Ref. LRD0057/S3.</p>
<p>14.4.2 High Quality Urban Design</p>	<p><i>Design principles shall be based on the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009 and Urban Design Manual – A Best Practice Guide 2009. These guidelines set out twelve design principles that are to be applied in future development schemes. Outlined in Objective DMSO5 of the Development Plan, the Council seeks to ensure:</i></p> <p><i>All medium to large scale planning applications (in excess of 5 residential units or 300sqm of retail/ commercial/office development in urban areas) or as otherwise required by the Planning Authority shall be accompanied by a Design Statement to address the contextual and design issues which have been taken into consideration as part of the scheme. A Design Statement shall:</i></p> <ul style="list-style-type: none"> - <i>Explain the design principles and design concept of the scheme.</i> - <i>Demonstrate how the twelve urban design criteria (as per the Urban Design Manual – A Best Practice Guide) have been considered when designing schemes in urban areas.</i>

	<p><i>Each of the twelve criteria is of equal importance and must be considered in an integrated manner.</i></p> <ul style="list-style-type: none"> - <i>Outline how the development meets the Development Plan Objectives, and the objectives of any Local Area Plan, Masterplan, Framework Plan, or other similar Plan affecting the site.</i> - <i>Include photographs of the site and its surroundings.</i> - <i>Include other illustrations such as photomontages, perspectives, sketches.</i> - <i>Outline detailed proposals for open space and ensure the provision of open space is designed in from the beginning when designing a new scheme.</i> - <i>Outline a detailed high quality open space and landscape design plan including specifications, prepared by suitably qualified professionals.</i> - <i>Outline how Green Infrastructure integrates into the scheme.</i> - <i>Demonstrate how the proposed scheme contributes in a positive manner to the public realm and to the local context.</i> - <i>Provide detail in relation to all intended finishing materials to be applied throughout the scheme, including an overall materials palette demonstrating suitability for the scheme, its context and the streetscape.</i> <p>An Urban Design Statement has been prepared by Crawford Architecture which we respectfully invite the Council to refer to for further details, for which addresses that of the above points, including the design statement previously approved under Reg. Ref. LRD0057/S3.</p>
<p>14.4.3 Ensuring Accessibility for All</p>	<p><i>In order to ensure that all new development is inclusive and accessible, the Council will have regard to the Universal Design Guidelines for Homes in Ireland and Housing Options for our Ageing Population-Policy Statement and the National Disability Authority’s Building For Everyone: A Universal Design Approach 2012 and will seek best practice standards in terms of accessibility. Developers will be required to comply with Part M of the Building Regulations – Access and Use.</i></p> <p>It is submitted that the proposed scheme has been designed cognisant of Section 28 Guidelines, including Universal Design Guidelines and requirements of Part M of the Building Regulations. For further details in this regard, please refer to the Urban Design Statement prepared by Crawford Architecture, enclosed under separate cover of this application including the design statement previously approved under Reg. Ref. LRD0057/S3</p>
<p>14.6 Design Criteria for Residential Development in Fingal</p>	
<p>14.6.1 Design and Layout</p>	<p><i>As outlined in the Development Plan, “applications for residential development are required to demonstrate compliance with room sizes, dimensions and overall floor areas set out in national guidance documents including:</i></p> <ul style="list-style-type: none"> - <i>Quality Housing for Sustainable Communities – Best Practice Guidelines, 2007,</i>

	<ul style="list-style-type: none"> - <i>Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009 and Urban Design Manual – A Best Practice Guide 2009,</i> - <i>Sustainable Urban Housing: Design Standards for New Apartments 2020.</i> <p><i>To demonstrate compliance with the housing and apartment standards as set by policy and guidance, all planning applications shall be accompanied by a ‘Schedule of Accommodation’ in line with the requirements of the Sustainable Urban Housing: Design Standards for New Apartments 2020.</i></p> <p>A Schedule of Accommodation/Housing Quality Assessment has been prepared by Crawford Architecture as part of the Architectural Pack, enclosed with this LRD submission. The Council is respectfully invited to review and refer to this. Accordingly, it should be noted that all housing and apartment units meet with and/or exceed the minimum standards of room sizes, dimensions, and overall floor areas set out in the relevant planning and development policy and guidelines.</p>
<p>14.6.2 Mix of Dwellings</p>	<p><i>Stated in the Development Plan, “all residential schemes are required to provide for a mix which reflects existing, and emerging household formation, housing demand patterns and trends identified within the specific area of the site and/or within the County as a whole. Applications shall include”:</i></p> <ul style="list-style-type: none"> - <i>A dwelling mix providing a balanced range of dwelling types and sizes to support a variety of households.</i> - <i>A detailed breakdown of the proposed unit type and size including a percentage split between one-, two-, three- and four-bedroom units.</i> - <i>A statement outlining how the scheme has been designed to meet the needs of older people/or persons with a disability and/or lifetime homes.</i> - <i>On smaller infill sites, a mix of dwellings which contribute to the overall dwelling mix in the locality.</i> <p>It is submitted that the proposed residential scheme on lands at Forest Road, provide for a mix of houses, duplex units and apartments, with the overall proposed residential unit total proposed at 108 no. units, as per the scheme permitted under Reg. Ref. LRD0057/S3.</p>
<p>14.6.3 Residential Density</p>	<p><i>In general, the density and number of dwellings to be provided within residential schemes should be determined with reference to Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009. Development should also be consistent with the policies and objectives set out in Chapter 3 Sustainable Placemaking and Quality Homes and should promote appropriate densities, having regard to factors including the location of the site, accessibility to public transport and the principles of sustainability, compact growth and consolidation.</i></p>

	<p>It is submitted that the proposed development provides for 108 no. dwellings on a site of 2.14ha (developable area), which facilitates a net density of 51 units per hectare which is deemed acceptable, as per the scheme permitted under Reg. Ref. LRD0057/S3.</p>
<p>14.6.4 Residential Standards</p>	<p>The minimum size of habitable rooms for houses/apartments/and flats shall conform with appropriate National guidelines/ standards in operation at the date of application for planning permission. Outlined in Objective DMSO19 of the Development Plan, the Council seeks to:</p> <p><i>“Require that applications for residential developments comply with all design and floor area requirements set out in:</i></p> <ul style="list-style-type: none"> - <i>Quality Housing for Sustainable Communities – Best Practice Guidelines 2007,</i> - <i>Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas 2009, the companion Urban Design Manual – A Best Practice Guide, DEHLG 2009,</i> - <i>Sustainable Urban Housing: Design Standards for New Apartments 2020.”</i> <p>In addition; as stated in:</p> <p>Objective DMSO20 of the Development Plan, <i>“All planning applications for residential development shall be accompanied by a Schedule of Accommodation to demonstrate compliance with housing and apartment standards.”</i></p> <p>Objective DMSO21 of the Development Plan, <i>“Require that all planning applications for residential development include floor plans for each room indicating typical furniture layouts and door swings.”</i></p> <p>The proposed scheme has been designed cognisant of relevant planning and development policy, as well as Section 28 Guidelines. For further details in this regard, please refer to the Architectural Drawings, Housing Quality Assessment, and Urban Design Statement prepared by Crawfords Architecture and enclosed under separate covers with this application.</p>
<p>14.6.5 Open Space Serving Residential Development</p>	<p><i>As stated in the Development Plan, “All applications for residential development are required to demonstrate the provision of private open space to serve the future requirements of the occupants of a residential unit. All multi-unit residential schemes are in addition, required to indicate all communal and public open space which will serve the scheme. Further, applicants shall at planning application stage provide a written schedule of all open space and shall submit a colour-coded drawing clearly indicating all areas of private, communal and public open space. The drawing should indicate (i) areas to be taken in charge by the Local Authority (ii) areas which will be within the private management of the homeowner and (iii) areas which will be the responsibility of a private management company. Full details of any short fall in provision shall also be stated.”</i></p>

	<p>It is submitted that the architectural drawings and landscape architecture drawings have set out the areas of open space. A Taken In Charge Drawing has also been prepared by Crawford Architecture, which would include the main roads and areas of open space which has previously been accepted under under Reg. Ref. LRD0057/S3.</p> <p>For further details in this regard, please refer to the Architecture drawings and documents prepared by Crawford Architecture, together with the Landscape Drawings prepared by RMDA Landscape Architecture, all enclosed with this application.</p>
<p>14.6.6 External Factors for Consideration</p>	<p><i>Outlined in sub-section 14.6.6.1 of the Development Plan, “All applications for residential development must ensure that the layout and design of individual units and accompanying public realms are designed in a manner which maximises daylight and sunlight.” According to Objective DMSO22 of the Development Plan:</i></p> <p><i>“Require Daylight and Sunlight analysis for all proposed developments of 50+ units or as required by the Planning Authority, depending on the context of the site and neighbouring property as well as the design of the development.”</i></p> <p>The proposed development complies with the principles of Site Layout Planning for Daylight and Sunlight, A Guide to Good Practice – (Building Research Establishment Report) 2011 and any updated guidance. 3D Design Bureau had previously a Daylight Sunlight Analysis report, enclosed with the parent permission LRD application (LRD0057/S3) which we respectfully invite the Council to refer to, as the subject application is not seeking any amendments to the permitted apartment units.</p> <p><i>Stated in sub-section 14.6.6.3, “All proposals for residential development, particularly apartment developments, over three storeys high, shall provide for acceptable separation distances between blocks to avoid negative effects such as excessive overlooking, overbearing and overshadowing and to provide sustainable residential amenity conditions and open spaces.” As per Objective DMSO23, the Council seeks:</i></p> <p><i>“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 three-storeys in height, minimum separation distances shall be increased in instances where overlooking or overshadowing occurs.”</i></p> <p>Notably, the Compact Settlement Guidance (2024) discusses suitable separation distances at 16m. The proposed development achieved various levels of separation distance between opposing windows with no amendments being proposed from the separation distances permitted under Reg. Ref. LRD0057/S3 and as such it is requested that permission be granted.</p>

<p>14.7 Apartment Development/Standards</p>	<p><i>Outlined in Objective DMSO24 of the Development Plan, the Council seeks to ensure:</i></p> <p><i>“All applications for apartment development are required to comply with the Specific Planning Policy Requirements (SPPRs), the standards set out under Appendix 1 and general contents of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities 2020 (or updated guidance as may be in place at the time of lodgement of the planning application).”</i></p> <p>The subject amendment application is not seeking permission for any changes to the apartment units permitted under Reg. Ref. LRD0057/S3. As such Fingal County Council are invited to refer to the Architectural Drawings and Urban Design Statement prepared by Crawford Architecture, along with that of the Energy & Sustainability Report prepared by Fallon Design, all enclosed and deemed acceptable within this LRD parent permission, Reg. Ref. LRD0057/S3.</p>
<p>14.7.1 Apartment – Unit Size and Mix</p>	<p><i>As reiterated in the Development Plan an according to Table 14.7 of the Plan, Specific Planning Policy Requirement 3 (SPPR 3) sets out the minimum floor areas for apartments – see extract below.</i></p> <p>The proposed scheme provides for the same apartment/duplex unit and house type(s) as per the application Reg. Ref. LRD0057/S3. All proposed units within the proposed scheme meet and/or exceed the minimum requirements of the aforesaid standards. For full details, please refer to the Schedule of Accommodation prepared by Crawford Architecture along with provided plans prepared by them also and all submitted under separate cover with this application.</p>
<p>14.7.2 Floor to Ceiling Heights</p>	<p><i>Outlined in the Development Plan and in line with SPPR 5 of the Apartment Guidelines, “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. 3.0m should be considered in such instances.”</i></p> <p>The proposed floor to ceiling heights of the units within the scheme are as per the parent permission which have been designed in accordance with SPPR 5 of the Apartment Guidelines. For full details in this regard, please refer to the Architectural Drawings prepared by Crawford Architecture, enclosed under separate cover of this application.</p>
<p>14.7.3 Internal Storage</p>	<p><i>The Development Plan notes, “Internal storage within an apartment unit shall be provided in accordance with the Sustainable Urban Housing Design Standards for New Apartments as set out in Appendix 1 and Section 3.30 to 3.34 of the Apartment Guidelines.”</i></p> <p>The proposed development provides for convenient and well-designed storage for all accommodation proposed, for which is in accordance with the Sustainable Urban Housing Design Standards for New Apartments as set out in Appendix 1 and Section 3.30 to 3.34 of the Apartment Guidelines. The Council are respectfully invited to refer to</p>

		the Architectural Drawings and Schedule of Accommodation, prepared by Crawford Architecture for further details of this compliance.
14.7.4 Dual Aspect		<p><i>Reiterated in the Development Plan and in line with SPPR 4 of the Apartment Guidelines:</i></p> <ul style="list-style-type: none"> - <i>There shall be a minimum of 33% dual aspect units 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 to ensure good street frontage.</i> - <i>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.</i> - <i>For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, the Apartment Guidelines state that Planning Authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.</i> <p>The subject amendment application is not seeking permission for any aspect that will alter the dual aspect units within the parent permission, Reg. Ref. LRD0057/S3 and as such it is requested that permission be granted for the subject development.</p>
14.7.6 Private Open Space		<p><i>Stated in the Development Plan, “Every apartment shall have private amenity space in the form of gardens or patios/terraces for ground floor apartments and balconies at upper levels... The minimum areas for private amenity are set out in Appendix 1 and Section 3 of the Apartment Guidelines.”</i></p> <p>It is submitted that the proposed development is in keeping with the requirements and standards of the relevant guidelines, with no changes proposed under the subject application. For full details in this regard, please refer to the Architectural Drawings and Schedule of Accommodation prepared by Crawford Architecture.</p>
14.7.8 Public Open Space		<p><i>As set in Chapter 4 and Section 14.13 of the Development Plan, whereas in Chapter 4 it is stated that “For all developments with a residential component, the overall standard for public open space provision is a minimum 2.5 hectares per 1000 population. In general, this shall be provided at a ratio of 75% Class 1 and 25% Class 2.”</i></p> <p>The proposed development comprises 12% of the RS zoned part of the site as public open space, as per the parent permission LRD0057/S3. However, a large public park is also proposed on the GB zoned part of the site. This extends to 23,107sq.m. in area and greatly exceeds the minimum requirement of 2.5 hectares per 1000 population which has already been accepted under Reg. Ref. LRD0057/S3.</p>
14.7.9 Communal Facilities		<p><i>Outlined in the Development Plan, “Applicants are encouraged to provide for a range of communal facilities for residents of a scheme, particularly as part of larger apartment developments.”</i></p>

	<p>The majority of units in this development are own-door units, with 41 apartments being proposed. Areas of communal open space were deemed acceptable under Reg. Ref. LRD0057/S3, as well as a large public park.</p>
<p>14.7.11 Security and Surveillance</p>	<p><i>Stated in the Development Plan, “Within the scheme, the design should include for the maximisation of natural surveillance of all common areas, streets, and parking areas and for active frontage to the building facades. Particular attention should be paid to the location of entrance doors and lobbies to ensure that such areas are well lit, have high levels of active surveillance and are overlooked. The design should also give due consideration to the security and privacy levels afforded to ground floor apartments.”</i></p> <p>It is submitted that passive surveillance and security are an integral part of the permitted and proposed scheme. All dwelling units are sited so to allow for active surveillance in areas of open space in proximity to the proposed dwellings and so provide an element of security as per guidance. For full details in this regard, please refer to the Architectural Drawings prepared by Crawford Architecture.</p>
<p>14.8 Housing Development/Standards</p>	
<p>14.8.1 Floor Areas</p>	<p><i>Outlined in the Development Plan, “The minimum size of habitable rooms for houses shall conform with dimensions as set out in Quality Housing for Sustainable Communities: Best Practice Guidelines for Delivering Homes Sustaining Communities 2007 or the appropriate National Guidelines standards in operation at the date of lodging the application for planning permission.”</i></p> <p>DOWNEY notes that all residential units within the proposed scheme comply with habitable room requirements of the Development Plan. For further details, please refer to the Architectural Drawings, Housing Quality Assessment, and Urban Design Statement prepared by Crawford Architecture.</p>
<p>14.8.2 Separation Distances</p>	<p><i>Set out in Objective DMSO26 of the Development Plan, the Council seeks to:</i></p> <p><i>“Ensure a separation distance of at least 2.3 metres is provided between the side walls of detached, semi-detached and end of terrace units. (Note: This separation distance may be reduced on a case-by-case basis in relation to infill and brownfield development which provides for the regeneration of under-utilised lands and subject to the overall quality of the design and the schemes contribution to the streetscape. A statement demonstrating design mitigation and maintenance arrangements shall be submitted in such cases).”</i></p> <p>In this regard, the proposed development archives various levels of separation distance between opposing windows, with no changes being proposed from what was previously accepted within Reg. Ref. LRD0057/S3. For further details in this regard, please refer to the Architectural Drawings and Housing Quality Assessment for further details in this regard.</p>

<p>14.8.3 Private Open Space</p>	<p><i>Outlined in Objective DMSO27 of the Development Plan, the Council seeks to:</i></p> <ul style="list-style-type: none"> - <i>“Ensure a minimum open space provision for dwelling houses (exclusive of car parking area) as follows:</i> - <i>3-bedroom houses or less to have a minimum of 60sqm of private open space located behind the front building line of the house.”</i> <p><i>In addition, Objective DMSO28 of the Development Plan:</i></p> <p><i>“Allow a reduced standard of private open space for one- and two-bedroom townhouses only in circumstances where a particular design solution is required such as to develop small infill/corner sites. In no instance will the provision of less than 48sqm of private open space be accepted per house.”</i></p> <p>For full details in this regard, please refer to the Architectural Drawings and Housing Quality Assessment prepared by Crawford Architecture and that of the landscaping pack prepared by RMDA Landscape Architects.</p>
<p>14.9 Residential Development – General Requirements</p>	
<p>14.9.3 Roads and Footpaths</p>	<p><i>According to the Development Plan, “The design of streets in urban areas is guided by the Design Manual for Urban Roads and Streets (DMURS) and the DMURS Interim Advice Note – Covid 19 Pandemic Response 2020. This Plan will support the implementation of DMURS principles for all new transportation and public realm schemes within the County.”</i></p> <p>It is submitted that the proposed development has been made cognisant of the DMURS and the DMURS Interim Advice Note – Covid 19 Pandemic Response 2020. The Council are invited to refer to the Engineering Pack prepared by Barrett Mahony Consulting Engineers (BMCE) for further information. It is also noted that the subject application will not provide for any changes to the road layout previously accepted within Reg. Ref. LRD0057/S3.</p>
<p>14.9.4 Open Plan Estates</p>	<p><i>Outlined in the Development Plan, “It is important to maintain the openness of residential development, particularly schemes where openness is a defining feature of the development. This can be achieved through the removal of the exempted development rights with regard to the provision of boundary walls, railing or other features to the front of houses.”</i></p> <p>The design and layout of the subject application is as per the development permitted under Reg. Ref. LRD0057/S3. It is submitted that the scheme provisions for a large area of open space with, with permeability and movement key features of the development. Future connectivity to adjoining lands has also been carefully considered, including an indicative design/layout for a pedestrian connection to the adjoining residential area to the north. For further details in this regard, please refer to the Architectural Drawings and Urban Design Statement</p>

		prepared by Crawford Architecture and the landscaping pack prepared by RMDA Landscape Architecture.
14.9.5 Communities	Gated	<p>According to the <i>Objective DMSO30 of the Development Plan</i>, the Council seeks to:</p> <p><i>“Prohibit proposals that would create a gated community for any new residential developments.”</i></p> <p>The subject scheme is not a gated development and will integrate with the area, with permeability and movement key features of the development.</p>
14.9.6 Companies	Taking in Charge and Management	<p>Outlined in the <i>Development Plan</i>, “In residential developments which are not proposed to be taken in charge by the Council, evidence will be required that Private Management Companies are to be established to manage developments on completion with a requirement for compulsory membership for all purchasers of property within the scheme. If a development (or part thereof) is to be Taken in Charge by the Council, the applicant shall agree at planning application stage those areas to be taken in charge by the Local Authority with such areas clearly delineated on a layout plan.”</p> <p>The proposed development will in the main be taken in charge by the Planning Authority and a Taken in Charge Drawing is included in the application.</p> <p>For parts of the scheme that would be privately managed, a Management Company shall be established following receipt of Planning Permission.</p> <p>The proposed access road to the proposed pumping station will be Taken in Charge by Uisce Éireann, as per the Taken in Charge drawing submitted under separate cover of this application.</p>
14.13 Open Space		
14.13.1	Hierarchy and Accessibility	<p>As per Objective DMSO49 of the <i>Development Plan</i>, the Council seeks to:</p> <p><i>“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.”</i></p> <p>It is submitted that the public open spaces envisaged within the scheme are designed to be permeable and accessible; the hierarchy of these open spaces are in keeping with requirements of Table 14.11 of the <i>Development Plan</i>. For further details in this regard, please refer to the Architectural Drawings and Urban Design Statement prepared by Crawford Architecture and the landscaping pack prepared by RMDA Landscape Architecture all of which has been deemed acceptable under Reg. Ref. LRD0057/S3.</p>
14.13.2	Quantity	<p>According to Objective DMSO51 of the <i>Development Plan</i>, the Council:</p> <p><i>“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.”</i></p>

The Development Plan set the thresholds for open space provision as below:

Table 14.12: Recommended Quantitative Standards (Sustainable Residential Developments in Urban Areas, Guidelines for Planning Authorities 2009)

Land use	Minimum public open space standards
Overall standard	2.5 hectares per 1000 population
New residential development on greenfield sites/LAP lands	12% - 15% of site area
New residential development on infill/ brownfield sites	12% of site area

The proposed development comprises 12% of the RS zoned part of the site as public open space.

However, a large public park is also proposed on the GB zoned part of the site. This extends to 23,107sq.m. in area and greatly exceeds the minimum requirement of 2.5 hectares per 1000 population all of which has been deemed acceptable under Reg. Ref. LRD0057/S3.

*According to **Objective DMSO56** of the Development Plan, the Council seeks to:*

“Ensure every home within a new residential scheme is located within 150 metres walking distance of a pocket park, small park, local park, urban neighbourhood park or regional park.”

In response to this, the public open space envisaged in the scheme, is provided in several locations of the subject site, providing close proximity to all proposed developments. This is suggested to provide for a balanced spread of public open spaces and an enhanced accessibility to these spaces. For further details in this regard, please refer to the Landscape Drawings prepared by RMDA Landscape Architecture.

14.13.3 Quality

The most relevant Objectives from the Development Plan with regard to the proposed scheme are as follows:

Objective DMSO63: *“Ensure open spaces are not located to the side or the rear of housing units.”*

Objective DMSO64: *“Ensure open space provision is suitably proportioned and inappropriate narrow tracts are not provided.”*

In response to this, the scheme is submitted to provide for quality open spaces, proposed in various locations within the subject site. Large areas of open space are primarily located centrally and on the southern areas of the subject lands. Notably the overall landscape plan ties into the established landscape hierarchy of the residential area of Rathingle, with the proposed design allowing for sympathetic reflection and linkage. This also promotes integration of the proposed development and movement of residents of both the proposed and existing area.

For further details in this regard, please refer to the Architectural Pack. Prepared by Crawford Architecture, together with the landscaping pack prepared by RMDA Landscape Architecture, for further information.

	<p>In addition, Objective DMSO68 seeks to: “Provide appropriately scaled children’s playground facilities within residential development. Playground facilities shall be provided at a rate of 4sqm per residential unit. All residential schemes in excess of 50 units shall incorporate playground facilities clearly delineated on the planning application drawings and demarcated, built and completed, where feasible and appropriate, in advance of the sale of any units.</p> <p>And Objective DMSO69 seeks to: “Ensure that in the instance of an equipped playground being included as part of a specific facility, it shall occupy an area of no less than 0.02 hectares. A minimum of one piece of play equipment shall be provided for every 50sqm of playground.”</p> <p>It is submitted that a Play Strategy had been incorporated within the landscape design of the scheme, comprising of provision for formal play area within the open spaces. For further details in this regard, please see Landscape Drawings and Rationale report prepared by RMDA Landscape Architecture, which was deemed acceptable under the parent permission, Reg. Ref. LRD0057/S3</p> <p>The Development Plan outlines the requirements for private open space provision for apartments and duplexes as below:</p> <p>Table 14.14: Open Space requirement for Apartment and Duplex Units</p> <table border="1" data-bbox="568 1016 1353 1240"> <thead> <tr> <th>Unit type</th> <th>Private amenity space</th> <th>Communal amenity space</th> </tr> </thead> <tbody> <tr> <td>Studio</td> <td>4 sq. m.</td> <td>4 sq. m.</td> </tr> <tr> <td>One bed</td> <td>5 sq. m.</td> <td>5 sq. m.</td> </tr> <tr> <td>Two bed</td> <td>7 sq. m.</td> <td>7 sq. m.</td> </tr> <tr> <td>Three bed</td> <td>9 sq. m.</td> <td>9 sq. m.</td> </tr> </tbody> </table> <p>It is noted that each residential unit benefits from the provision of adequately sized private open space in the form of gardens, balconies, or patios/terraces (designed in accordance with quantitative and qualitative standards), with the units at ground floor level provided with appropriate boundary treatments to ensure privacy and security whilst also providing visual interest and distinction between spaces.</p> <p>For further information on the private open space proposed as part of this application, please refer to the architectural plans and Urban Design Statement prepared by Crawford Architecture, and the landscaping pack prepared by RMDA Landscape Architecture.</p>	Unit type	Private amenity space	Communal amenity space	Studio	4 sq. m.	4 sq. m.	One bed	5 sq. m.	5 sq. m.	Two bed	7 sq. m.	7 sq. m.	Three bed	9 sq. m.	9 sq. m.
Unit type	Private amenity space	Communal amenity space														
Studio	4 sq. m.	4 sq. m.														
One bed	5 sq. m.	5 sq. m.														
Two bed	7 sq. m.	7 sq. m.														
Three bed	9 sq. m.	9 sq. m.														
<p>14.14 Community Infrastructure</p>																
<p>14.14.1 Community Facilities</p>	<p>According to Objective DMSO78 of the Development Plan, “Planning applications for large scale residential and mixed-use developments, of 50 or more residential units, shall include a Community and Social Infrastructure Audit. This audit shall assess the provision of community and social infrastructure within the vicinity of the site and shall identify existing shortcomings in terms of these facilities and assess whether there is a need to provide additional facilities to cater for the proposed development. A Community and Social Infrastructure Audit shall include the following:</p>															

	<ul style="list-style-type: none"> - An assessment of existing community and social infrastructure facilities within 1 km of the subject site. - An assessment of the need in terms of necessity, deficiency, and opportunities to enhance/share existing facilities based future population projections for the area. - A justification as to whether or not a new community facility will be provided as part of the proposed development, based on the findings of the audit.” <p>In response to this, A Community and Social Infrastructure Audit and a Childcare Provision Assessment were both undertaken by DOWNEY and are submitted as part of the parent permission application and deemed acceptable under Reg. Ref. LRD0057/S3. Further to this, the subject amendment application is not seeking any increase in the number of units permitted, however, under the conditions attached to Reg. Ref. LRD0057/S3 the scheme shall now provide a creche facility.</p>
<p>14.17 Connectivity & Movement</p>	
<p>14.17.2 Bicycle Parking</p>	<p>Outlined in Objective DMSO109 of the Development Plan, the Council seeks to: “Ensure that all new development provides high quality, secure and innovative bicycle parking provision in accordance with the bicycle parking standards set out in Table 14.17 and the associated design criteria for bicycle parking provision set out in this Plan, where feasible, practical and appropriate, having regard to local, national and international best practice.”</p> <p>The proposed development provides considerable secure, covered bicycle parking for the houses, duplex units and apartments as part of the development proposal. This facilitates and will encourage future residents and visitors to use sustainable modes of transportation. It is considered that the bicycle parking provision as part of the proposed development is consistent with Table 14.17 - Bicycle Parking Standards of the Development Plan, and Section 4.15 of the 2022 guidelines Design Standards for Apartments.</p> <p>For further details, please refer to the Architectural Drawings prepared by Crawford Architecture together with that of the and Traffic and Management Plan and drawings prepared by Barrett Mahony Consulting Engineers (BMCE).</p>
<p>14.17.3 Mobility Management Plans</p>	<p>As per Objective DMSO111 of the Development Plan, “For all new developments which are likely to generate a significant demand for travel, require the preparation and submission of a Mobility Management Plan as part of the development management process. This requirement includes existing developments that are expanding or intensifying their use.”</p> <p>Barrett Mahony Consulting Engineers (BMCE) have prepared a Transport and Mobility Statement and Mobility Management Plan, submitted as part of this LRD application, which we respectfully invite the Council to refer to under separate cover.</p>
<p>14.17.4 Traffic and Transport Assessment</p>	<p>Outlined in Objective DMSO113 of the Development Plan, the Council, “Require the provision of a Traffic and Transport Assessment where new</p>

	<p><i>development is likely to have a significant effect on travel demand and the capacity of the surrounding transport network including the road network and public transport services network.”</i></p> <p>Barrett Mahony Consulting Engineers (BMCE) had previously prepared a Traffic and Transport Assessment for which was submitted as part of the parent permission LRD application and deemed acceptable. The subject application is not seeking any changes to the number of units and as such will not increase the total units granted.</p>												
<p>14.17.7 Car Parking</p>	<p><i>The Development Plan defines 2 Car Parking Zones to ensure adequate residential parking provision and the control of destination car parking with regard to access to public transport services. It also outlines standards for car parking provision as per the Table below.</i></p> <p>Table 14.19: Car Parking Standards</p> <table border="1" data-bbox="536 725 1382 981"> <thead> <tr> <th>Land Use Category</th> <th>Zone 1: Developments within 800m of a high-quality bus service, or 1600m of an existing or planned Luas/DART/Metro Rail station or in lands zoned Major Town Centre***</th> <th>Zone 2: All other areas</th> </tr> </thead> <tbody> <tr> <td colspan="3">Residential</td> </tr> <tr> <td>Residential (1-2 Bedroom)</td> <td>0.5</td> <td>Max. 1 plus 1 visitor space per 5 units</td> </tr> <tr> <td>Residential (3-3+ Bedroom)</td> <td>1</td> <td>Max. 2 plus 1 visitor space per 5 units</td> </tr> </tbody> </table> <p>It is proposed to provide 96 No. car parking spaces for the development, which was deemed acceptable under Reg. Ref. LRD0057/S3, and as such, given there is no change to the number of units proposed, there is no change to the number of car parking spaces.</p>	Land Use Category	Zone 1: Developments within 800m of a high-quality bus service, or 1600m of an existing or planned Luas/DART/Metro Rail station or in lands zoned Major Town Centre***	Zone 2: All other areas	Residential			Residential (1-2 Bedroom)	0.5	Max. 1 plus 1 visitor space per 5 units	Residential (3-3+ Bedroom)	1	Max. 2 plus 1 visitor space per 5 units
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<p>14.17.8 Accessible Car Parking</p>	<p><i>Outlined in the Development Plan, “Provision for designated Age Friendly car parking and Parent and Child car parking provision is encouraged. Disabled car parking spaces should be provided as close as reasonably possible to building entrance points and allocated and suitably sign posted for convenient access.”</i></p> <p>The proposed development is served with an appropriate level of accessible car parking bays as per the parent permission, Reg. Ref. LRD0057/S3. The Council are respectfully invited to refer to the Architectural Drawings prepared by Crawford Architecture along with the Traffic and Transport Assessment prepared by Barrett Mahony Consulting Engineers (BMCE).</p>												
<p>14.17.10 Electric Vehicle Parking</p>	<p><i>Set out by the Development Plan, “All multi-unit residential developments shall incorporate EV charging points at 20% of the proposed parking spaces and appropriate infrastructure (e.g. ducting) to allow for future fit out of a charging point at all parking spaces.”</i></p> <p>All parking bays are provided with EV charging and as such is acceptable.</p>												
<p>14.18 Green Infrastructure and Natural Heritage</p>	<p><i>According to Objective DMSO124 of the Development Plan, the Council “Require the submission of an Integrated Green Infrastructure Plan as part of planning applications for residential developments over 50 units and all commercial developments over 2000sqm.</i></p>												

	<p>A Green Infrastructure Plan has been incorporated within the Landscape Drawings prepared by RMDA Landscape Architecture, enclosed with this application, which we respectfully invite the Council to refer to.</p>
<p>14.8.1 Tree Policy</p>	<p><i>The most relevant Objectives of the Development Plan in relation to the proposed scheme are as below:</i></p> <p>Objective DMSO127: <i>“Require the use of native species where appropriate in new developments in consultation with the Council.</i></p> <p>Objective DMSO128: <i>“Ensure trees, hedgerows and other features which demarcate townland boundaries are preserved and incorporated where appropriate into the design of developments.”</i></p> <p>Objective DMSO131: <i>“Street tree planting plans shall accompany developments over 50 units. Constructed tree pits will be required where trees are planted in hard surfaces and grass verges less than 1.2m wide. These plans will include the location of each constructed tree pit of a minimum rooting volume of 16 cubic metres, lamp standards and underground services. The location of tree planting in proximity to built features including footpaths must refer to BS5837:2012 Trees in Relation to Design, Demolition and Construction – Recommendations. The width of grass verges where tree planting is proposed must be labelled on landscape plans.”</i></p> <p>Objective DMSO133: <i>“Where new trees are being planted, these will be located so they do not cause future interference to streetlights, typically trees shall be located so there is a distance of no less than 7m from the centre of the main stem to the lighting pole.”</i></p> <p>Objective DMSO134: <i>“Regardless of development size or type, applicants must submit an overall site summary quantifying and detailing the following:</i></p> <ul style="list-style-type: none"> - tree and hedgerow removal; - tree and hedgerow retention; and - new tree and hedgerow planting. <p>The permitted scheme in terms of planting and overall landscaping has been designed with consideration of the above points which has been accepted under Reg. Ref. LRD0057/S3. The Planning Authority are respectfully requested to refer to that of the landscaping pack, prepared by RMDA Landscape Architects for which illustrated compliance with the aforementioned guidance and objectives.</p>
<p>14.18.2 Natural Heritage</p>	<p>14.8.2.1 Biodiversity</p> <p>The most relevant Objectives of the Development Plan in relation to the proposed scheme are as following:</p> <p>Objective DMSO138: <i>“Ensure all development and infrastructure proposals include measures to protect and enhance biodiversity leading to an overall net biodiversity gain.”</i></p> <p>Objective DMSO139: <i>“Ensure that an ecological study is carried out for the development site covering habitats and flora, breeding birds, bats and amphibians to identify existing ecological valuable features and the species composition of the site.”</i></p>

Objective DMSO140: *“Protect existing landscape features such as scrub, woodland, large trees, hedgerows, meadows, ponds and wetlands which are of biodiversity or amenity value and/or contribute to landscape character and ensure that proper provision is made for their protection and management.”*

Objective DMSO141: *“Incorporate habitat features (new or existing) and other conservation measures for species of conservation interest (e.g., legally protected species or Amber and Red listed bird species) in the Integrated Green Infrastructure Plan.”*

Objective DMSO143: *“Require all new developments to incorporate habitat facilities for wildlife species as appropriate including Kestrel, Peregrine, Swifts, House Sparrows, Swallow, Starling, Bats and insects in or on buildings facades.”*

It is submitted that the aforesaid Objectives have all been fully addressed in the landscape drawings prepared by RMDA Landscape Architecture and Ecological Pack prepared by Altemar, which we respectfully invite the Council to refer to, including the relevant reports submitted and accepted under Reg. Ref. LRD0057/S3.

14.18.2.2 Biodiversity Conservation in Fingal

The most relevant Objectives of the Development Plan in relation to the proposed scheme are as following:

Objective DMSO144: *“Ensure Screening for Appropriate Assessment and, where required, full Appropriate Assessment is carried out for all plans and projects in the County which, individually, or in combination with other plans and projects, are likely to have a significant direct or indirect impact on any European site or sites.”*

Objective DMSO145: *“Ensure that sufficient information is provided as part of development proposals to enable Screening for Appropriate Assessment to be undertaken and to enable a fully informed assessment of impacts on biodiversity to be made.”*

Objective DMSO146: *“Ensure that Natura Impact Statements (NIS) and any other ecological impact assessments submitted in support of proposals for development are carried out by appropriately qualified professionals and that any necessary survey work takes place in an appropriate season.”*

Objective DMSO147: *“Ensure planning applications for proposed developments likely to have significant direct or indirect impacts on any European Site or sites are accompanied by a Natura Impact Statement prepared in accordance with the Guidance issued by the Department of the Environment, Heritage and Local Government (Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, 2009).”*

Objective DMSO148: *“Ensure ecological impact assessment is carried out for any proposed development likely to have a significant impact on proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves, Refuges for Fauna, Habitat Directive Annex I sites and Annex II species contained therein, or rare and*

	<p><i>threatened Flora Protection order and Red Data Book species and their habitats. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment."</i></p> <p>A Screening for Appropriate Assessment and Ecological Impact Assessment have both previously been prepared by Altemar and permitted under Reg. Ref. LRD0057/S3. Altemar have prepared an updated Appropriate Assessment to accompany the subject application, and this is submitted under separate cover.</p>
<p>14.19.2 Archaeological Heritage</p>	<p>Objective DMSO169 – Archaeological Impact Assessment</p> <p><i>" All development proposals which may have implications for archaeological heritage shall be accompanied by an Archaeological Impact Assessment. This assessment will consist of the following: "</i></p> <p><i>Site inspection/walk-over survey,</i></p> <p><i>" Archaeological heritage of the receiving area, "</i></p> <p><i>Examination of upstanding or visible features or structures, "</i></p> <p><i>Topographical assessment including historic townland boundaries, "</i></p> <p><i>Physical description and photographic record of the archaeological feature, site or object, "</i></p> <p><i>Examination of existing or new aerial photographs or satellite or other remote sensing imagery, "</i></p> <p><i>Geophysical survey, archaeological test excavation, where appropriate, which should be carried out by suitable qualified professionals (geophysicists and archaeologists),</i></p> <p><i>" Identification of potential direct and in-direct impacts of the proposed development on archaeological remains, "</i></p> <p><i>Identification of climate change vulnerability,</i></p> <p><i>" Mitigation measures to ameliorate any such impacts of the proposed development on the definition of the buffer area surrounding the monument which will preserve the setting and visual amenity of the site,</i></p> <p><i>"</i></p> <p><i>Provision of details on protection measures to be used on site.</i></p> <p>An Archaeological Impact Assessment (Geo Physical Report) had previously been prepared by ACSU, following a desktop survey, all of which was submitted with the parent permission, Reg. Ref. LRD0057/S3.</p>
<p>14.20 Infrastructure and Utilities</p>	
<p>14.20.1 Water Services Infrastructure</p>	<p><i>Outlined in Objective DMSO196 of the Development Plan, the Council seeks to: "Ensure that all new developments in areas served by a public foul sewerage network connect to the public sewerage system, to comply with the requirements of the Uisce Éireann Foul Sewer specification (where applicable)."</i></p> <p><i>Also, as per Objective DMSO197 of the Development Plan, the Council "Require all new development to provide separate foul and surface water drainage systems and to prohibit the connection of surface water outflows to the foul drainage network and vice versa (prohibit foul to surface water) where separation systems are available."</i></p>

	<p>It is submitted that all details regarding above-mentioned Objectives can be found in the Engineering Pack prepared by Barrett Mahony Consulting Engineers (BMCE). This includes information on the foul water network, surface water network and water supply.</p>
<p>14.20.3 Sustainable Urban Drainage Systems (SuDS)</p>	<p><i>Outlined in Objective DMSO205 of the Development Plan, the Council “Require the preparation of a Surface Water Management Plan as part of all new developments which shall include the following:</i></p> <ul style="list-style-type: none"> - <i>Identify and assess the existing surface water movements through the development before considering and developing a surface water management system using SuDS, having regard to our Fingal Guidance Document – Green/ Blue Infrastructure for Development, as amended. (Appendix 11).</i> - <i>Incorporate SuDS along the route of the water movement to enhance the water quality effects of nature-based systems at the different stages – Treatment Train approach from source to discharge.”</i> <p>It is intended to utilise SuDS within the proposed scheme, and this has been fully accepted within the parent permission. Fingal County Council are invited to refer to the engineering drawings, all prepared by Barrett Mahony Consulting Engineers (BMCE) and submitted with the parent permission (Reg. Ref. LRD0057/S3), and the subject amendment application.</p>
<p>14.20.6 Flood Risk Management</p>	<p><i>Outlined in Objective DMSO212 of the Development Plan, the Council seeks to: Have regard to the OPW Flood Risk Management Guidelines 2009, as revised by Circular PL 2/2014, when assessing planning applications and in the preparation of statutory and non-statutory plans and to require site specific flood risk assessments be considered for all new developments within the County. All developments must prepare a Stage 1 Flood Risk Analysis and if the flooding risk is not screened out, they must prepare a Site-Specific Flood Risk Assessment (SSFRA) for the development, where appropriate.”</i></p> <p>A Site-Specific Flood Risk Assessment, prepared by Barrett Mahony Consulting Engineers was provided with the permitted LRD application and deemed acceptable under Reg. Ref. LRD0057/S3</p>
<p>14.20.12 Waste Management</p>	<p><i>The following provides an overview of the most relevant Objectives of the Development Plan in relation to the proposed development.</i></p> <p><i>Objective DMSO236: “Ensure all new large-scale residential and mixed-use developments include appropriate facilities for source segregation and collection of waste.”</i></p> <p><i>Objective DMSO237: “Ensure all new residential schemes include appropriate design measures for refuse storage areas, details of which should be clearly shown at pre-planning and planning application stage. Ensure refuse storage areas are not situated immediately adjacent to</i></p>

	<p><i>the front door or ground floor window, unless adequate screened alcoves or other such mitigation measures are provided.”</i></p> <p><i>Objective DMSO238: “Ensure the maximum distance between the front door to a communal bin area does not exceed 50 metres.”</i></p> <p>It is submitted that the scheme has been made cognisant of the aforesaid Objectives of the Development Plan with all relevant details can be found within the provided Operational Waster Management Plan prepared by Wave Dynamics which was accepted under Reg. Ref. LRD0057/S3.</p>
<p>14.20.15 Construction Noise</p>	<p><i>According to Objective DMSO243 of the Development Plan, “Where development sites adjoin residential properties, the Planning Authority shall restrict the operation of equipment or machinery (to include pneumatic drills, construction vehicles, generators, etc.) on or adjacent to the site before 07.00 hours on weekdays and 09.00 hours on Saturdays, after 19.00 hours on weekdays and 13.00 hours on Saturdays and at any time on Sundays, Bank Holidays or Public Holiday.”</i></p> <p>In response to this, and as previously noted, demolition works were not required for the proposal, notwithstanding a Construction, Environmental Management Plan has been prepared by Barrett Mahony Consulting Engineers (BMCE) and submitted as part of the permitted LRD application LRD0057/S3, which the Planning Authority is respectfully invited to review.</p>
<p>14.21 Climate Action</p>	
<p>14.21.3 Climate Action Energy Statement</p>	<p><i>According to Objective DMSO261 of the Development Plan, the Council seeks, “All new developments involving 15 residential units and/or more than 1,000 sqm of commercial floor space, or as otherwise required by the Planning Authority, will be required to submit a Climate Action Energy Statement as part of the overall Design Statement to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development.”</i></p> <p>The Planning Authority are respectfully directed to refer to the Climate and Energy Report prepared by Fallon Design and submitted under separate cover of the parent permission, Reg. Ref. LRD0057/S3 which has already been accepted.</p>

4.0 CONCLUSION

DOWNEY, Chartered Town Planners, 29 Merrion Square, Dublin 2, D02 RW64, have prepared this Planning Statement and Statement of Consistency with Planning Policy on behalf of our client and the applicant, Golden Port Homes Limited, to accompany a proposed Large-Scale Residential Development (LRD) amendment application on lands at Forest Road, Swords, Co. Dublin.

The proposed development subject to this LRD application provides for amendments to the permitted 108 residential units, granted under Reg. Ref. LRD0057/S3. The proposed development will consist of amendments to previously permitted House Type B, House Type C, and House Type E, as well as

amendments to the permitted Duplex units, all of which will improve the overall viability of the units, and enhance the residential amenities for the future residents. The subject application is also seeking permission for the provision of a new underground pumping station. This requirement has been raised following engagement with Uisce Eireann regarding the connection agreements for the application permitted under Reg. Ref. LRD0057/S3. It is important to note that the overall nature of the development and the changes are related to some changes to house types, and the provision of a new foul water pumping station. The same road layout and location of open space areas are not proposed to be changed. There is no change to the overall number of units being proposed.

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 represents a high-quality residential development. DOWNEY trust that the enclosed plans and particulars pertaining to this application are in order and look forward to a favourable decision from Fingal County Council in due course.