

**D C W N E Y**

**STATEMENT OF RESPONSE TO AN BORD PLEANÁLA  
PRE-APPLICATION CONSULTATION OPINION**

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

**Applicant: Gerard Gannon Properties**

**April 2022**

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## 1.0 INTRODUCTION

This Statement of Response accompanies a planning application to An Bord Pleanála for a proposed Strategic Housing Development on lands to the south of Rathbeale Road and to the north and south of Main Street and to the east and southeast of Mooretown Distributor Road (Western Distributor Link Road), Mooretown, Swords, Co. Dublin, with associated engineering works on lands locally known as the Celestica/Motorola site, junction of Glen Ellan Road and Balheary Road, and at/on Balheary Road, Swords, Co. Dublin.

Following consultation with Fingal County Council under Section 247 of Planning and Development Act, 2000 (as amended), a request to enter into pre-application consultation with An Bord Pleanála was submitted on 16<sup>th</sup> September 2021, with An Bord Pleanála subsequently accepting the Section 5 pre-application consultation request. The pre-application consultation meeting was then held virtually via Microsoft Teams on 19<sup>th</sup> October 2021. On 29<sup>th</sup> October 2021, An Bord Pleanála issued the notice of pre-application consultation opinion for the proposed development, under case reference ABP-311441-21.

Having regard to the above, the opinion states that *“An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.”* and notes 2 no. items to be submitted with any application. The opinion further states that *“Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified that, in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission”* and notes 7 no. items to be submitted with the application.

The statement now sets out a response to An Bord Pleanála’s pre-application consultation opinion. This statement of response should be read in conjunction with all drawings and documentation submitted as part of this Strategic Housing Development application.

## 2.0 ITEMS FOR FURTHER CONSIDERATION & AMENDMENTS

### 2.1 Item No. 1 – Development Strategy

#### ABP Opinion

*“Further consideration and/or justification of the documents as they relate to the urban design response of the proposed development along the proposed Western Distributor Link Road (WDLR). The documentation should demonstrate how the design, scale and massing of the proposed development takes into consideration the indicative building blocks/line illustrated in the Oldtown Mooretown LAP and complies with the 12 Criteria of the Urban Design Manual – A best practice guide (in particular Criteria No. 1). The further consideration and/or justification may require an amendment of the documentation to*

*ensure the proposed development can ensure a high-quality design response to the permitted WDLR.”*

### **Applicant’s Response**

Prior to responding the items above and demonstrating the rationale behind the design of the proposed scheme, it is noted that an Urban Design and Architectural Statement has been prepared by CCK Architects and is submitted under a separate cover. This provides the design approach utilised within the proposed scheme with respect to the 12 criteria set out in the Urban Design Manual, DMURS, and Development Management Standards of the current County Development Plan, which we invite the Board to refer to. This is suggested to be read in conjunction with the engineering pack prepared by Waterman Moylan Consulting Engineers as part of this SHD application. The following provides a synopsis of the LAP approach, on-going development of the lands, relevant guideline policy and in particular Urban Design Manual, and how these elements have shaped the design of the proposed development, and specifically the design response to the permitted Western Distributor Link Road (WDLR). It is submitted that another significant element contributing to the scheme is the pre-application consultation process and off-line consultation meetings with the Board, Local Authority, and its relevant departments.

#### ***i) Oldtown-Mooretown Local Area Plan***

The Oldtown-Mooretown LAP shows indicative building blocks along the edge of the indicative line of the WDLR, coupled with pedestrian/cycle connections and a green buffer strip. The indicative road alignment is very straight where it runs by the subject lands. Long, straight distributor roads are not compatible with residential development, even on the fringes of a neighbourhood, and it is considered that the shown alignment is very much indicative and that a detailed design would introduce some means of traffic-calming and principles of DMURS. Within the Mooretown lands, the WDLR has been granted permission and constructed up to Main Street and the village centre (F12A/0270). The constructed section of road does not follow the indicative line and a large curve was introduced for traffic calming on the advice and suggestion of Fingal Transportation Section. Where this curve occurs, the central Watermill Park billows out to meet the road. The second section of WDLR within the Mooretown lands was granted planning permission in May 2021 (F20A/0096). In a similar manner to the constructed section, a large curve was introduced to slow traffic speed. The permitted alignment moves away from the RA zoning line and creates a large tract of GB zoned greenbelt land between the road and future development.

#### ***ii) Urban Design Manual: Context ‘How does the development respond to its surroundings?’***

The western development boundary has been defined by the position of the WDLR, the RA zoning line and the greenbelt lands between them. The design solution needs to respond to these conditions by creating a defined and active building edge, plenty of own-door access, passive surveillance from taller buildings, connections for permeability and an attractive public realm. The design solution will need to make a positive contribution to the character of the new neighbourhood and also the WDLR itself. The WDLR has been constructed within the Oldtown part of the Oldtown-Mooretown LAP lands and through the northern section of the Mooretown LAP lands. Its character changes as it moves from one neighbourhood to the next: in Oldtown there is residential development on both sides of the WDLR.

Various design tools are used to calm and enhance what is essentially a distributor road. Buildings are brought close to the kerb line, parallel parking and street trees line the edges, multiple junctions, major and minor, are provided, dwellings have active frontages and front doors facing onto the road and slip roads are avoided. Slip roads only occur where a trunk watermain wayleave precludes any built development from occurring close to the road. The character of the WDLR changes from a busy double-sided 'street' to a single sided 'link' road when it enters the Mooretown LAP lands. Permitted development is generally set back from the kerb line (in part due to the same trunk watermain wayleave) and the large 'Watermill Park' interrupts the building edge for some distance. Planning permission has been granted for 'Phase 2' of the Mooretown lands, the permitted development provides for 4-5-storey apartment blocks overlooking the Watermill Park and the WDLR before scaling back to 2 and 3-storey housing set closer to the kerb, but at some distance as direct access, multiple junctions and parallel parking were not permissible at the time of application (F16A/0505).

### ***iii) Design Response***

Further consideration has been given to the form, height and grain of the building line to the WDLR. The proposed development has been brought tight to the zoning line which for the greater part follows the edge of the WDLR. Buildings closest to the Main Street junction are taller and denser, with a 3-5 storey apartment block (Apartment Block A) proposed on the north side of the junction and 3-storey own-door duplex buildings on the southern side. The north wings of Apartment Block A comprise own-door triplex units with a distinctive gabled elevation and ease the transition from the 5-storey element of the building to the permitted 2-storey houses behind this block (F16A/0505). The site falls towards the southeast and it was considered appropriate to place taller buildings on the north side of the street and at a slightly lower level, thereby mitigating against overshadowing of the public realm and ground/first floor dwellings from buildings on the southern side.

South of the junction, 3-storey terraces of duplex units continue tight to the road and zoning line, ending with a 3-storey pavilion block, which acts as a punctuation stop for this main street character area.

From this point, the permitted WDLR curves west towards the townland boundary before swinging due south to the Applicant's southernmost boundary, leaving a large expanse (up to 40m wide) between the kerb and zoning line. It is proposed to create a large nature park on these lands, fronted by two long terraces of 3-storey houses and two pavilion buildings closing the development at either end, Duplex Block N and Apartment Block F. Blocks need to 'step' with the slope and in this regard fine-grained duplex units and houses work well, and better than a single-entrance 'flat' slab apartment block could.

The proposed nature park takes its cue from the landscape plan permitted with the WDLR (F20A/0096). This is a very natural and native planting scheme that will reinforce the townland boundary running along the western edge of the Mooretown lands. It is proposed to continue this theme into the nature park, effectively wrapping the southern part of Mooretown in a green wall that hugs the building line. The permitted cycle and pedestrian link from Abbeyvale (F20A/0095) are now proposed the curve through the park, with options to join an off-road 2-way cycle track aligned to the WDLR or to continue through the park setting. Further consultation between Fingal Parks Section and

the landscape architect has led to the inclusion of playground areas and a MUGA, all carefully and sensitively placed into the nature park. This park will be one small part of a series of green spaces and links forming an arc around western Swords from the Broadmeadow Linear Park to the Ward River Valley. For further details in this regard, please refer to the Section 4.1 of the Architectural and Design Statement prepared by CCK Architects.

It is considered that the proposed development complies with the objectives of the Oldtown-Mooretown LAP for a defined, built edge to the WDLR where the WDLR runs tight to the RA zoning line. Taller, fine-grained buildings with a variety of typologies (own-door triplex units, apartments, own-door duplex units and terraced houses) provide enclosure, activity and variety in elevation and roofscape. Where the building line cannot contravene the RA zoning and 'follow' the road, a large nature park will provide an attractive, active and bio-diverse amenity for residents and for those travelling through the site on foot or by bike.

For further details in this regard, please refer to the enclosed Architectural Statement and drawings prepared by CCK Architects. Also, please refer to the drawings and report prepared by Doyle O'Troithigh Landscape Architecture.

## 2.2 Item No. 2 – Irish Water

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### ABP Opinion

*“Further consideration and/or justification of the documents as they relate to the proposed treatment of the wastewater. In particular, the consideration/clarification should address the contents of the submission from Irish Water (dated 18th of October 2021) concerning the need to deliver a storage tank to facilitate an increase in the capacity of the wastewater infrastructure. Clarity is required at application stage as to what upgrade works are required, who is to deliver these works, when are the works to be delivered relative to the completion of the proposed housing development and whether such upgrade works are to be the subject of separate consent processes.”*

### Applicant's Response

Waterman Moylan Consulting Engineers have addressed this response within their engineering pack, and in particular the additional engineering assessment enclosed within the pack, which the Board are invited to refer to. The following provides an overview of the findings.

As a result of known constraints (due to stormwater ingress) within the existing Irish Water gravity foul network, Irish Water have modelled the catchment, and indicated that they require a storage tank of 2,250 m<sup>3</sup> volume to be located, ideally near the outfall sewer on the Balheary Road. In this regard, it is proposed to provide a stormwater storage tank and outfall utilising lands on the Celestica site to alleviate these constraints, as further developed within the accompanying Additional Engineering Assessment Report (21-011r.008), submitted under a separate cover. These critical wastewater infrastructure works will be developer led through the planning process. Delivery/Construction of this critical piece of infrastructure will occur in advance of the subject proposed housing development, by either the Applicant or Irish Water, still to be determined. The planning

submission for this infrastructure forms part of this SHD application. For further details in this regard, please refer to the enclosed engineering pack prepared by Waterman Moylan as part of this SHD application.

### 3.0 SPECIFIC FURTHER INFORMATION

#### 3.1 Item No. 1 – Breakdown of Public Space Provision

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##### ABP Opinion

*“A quantitative and qualitative assessment which provides a breakdown of the public and communal open space areas. This assessment should include a detailed landscape plan including the provision of communal amenity spaces and play facilities in line with the Sustainable Urban Housing: Design Standards for New Apartments (2020) and the requirements of Fingal County Council Parks Department.”*

##### Applicant’s Response

Doyle O'Troithigh Landscape Architects have addressed this response within their landscape pack, which the Board are invited to refer to. This demonstrates the landscape proposals, including hierarchy of public open space provision, hard and soft landscaping, equipped open spaces, and playgrounds. This is suggested to be read in conjunction with the enclosed Urban Design and Architectural Statement prepared by CCK Architects. The following provides an overview of the rationale to the proposed public open space, communal open space, and playground within the scheme, and the qualitative aspect of this provision.

outlined in the Development Plan, providing sufficient quantities of open space and recreational facilities. For all developments with a residential component, the overall standard for public open space provision is a minimum 2.5 hectares per 1000 population. Set out under **Objective PM52** of the Development Plan, the Council seeks to:

*“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.”*

With regards to the above, it is submitted that the public open space is provided at a rate of 25 sqm per bedspace. Accordingly, the total number of bedspaces is calculated at 1,737 which provides for a total of 43,425 sqm public open space (incl. Class 1 and 2 open space). This is 11.9% of the net development lands calculated at 14,474 hectares.

It is submitted that this exceeds the 10% threshold defined as the requirement of the Development Plan, and therefore, the scheme complies with the planning policy in terms of open space provision. The location and area of each plot of public open space is depicted on the Figure 1 on the next page.

Table 1. Open Space Requirement

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

Taken together, these demonstrate that of the 43,425 sqm of public open space required, 17,232 sqm is to be provided within the proposed scheme. It is important to note that the balance of 26,193 sqm is to be provided on OS zoned lands as part of the regional park. The public open space is designed to provide a clear definition of open space as public and communal, as distinct from private, and the organization of pocket parks define sub-character places within the scheme; For instance, the Central Park is a highly legible triangular space that helps to orientate visitors in the most intensely planned part of the development. For further information in this regard, please refer to the enclosed architecture drawings and Design Statement prepared by CCK Architects.

An overview of the Class 2 Public Open Space provision in the scheme is provided in the Table below.

Table 2. 'Class 2' Public Open Space Provided

Park	Area (sqm)	Description
<b>East Square</b>	1,137	Multi-purpose civic space in front of the primary school and linked to East Square by a wide path
<b>West Square</b>	416	Smaller, more intimate west-facing civic space with 'spill-out' from the shop/café and linked to East Square by a wide path
<b>Pocket Park 01</b>	735	Small amenity park buildings close to the edges on two sides
<b>Pocket Park 02</b>	500	Small active space on the eastern nature walk.
<b>Central Park</b>	5,647	Large park with space for active play and kick-about
<b>Ringfort Park</b>	8,588	Large Park with space for active play and kickabout. Links directly into the eastern nature walk.
<b>Abbeyvale</b>	209	New open space to be contiguous with the existing park in Abbeyvale
<b>Total</b>		<b>17,232</b>

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

In terms of play areas and opportunities within the scheme, it is stated in the Development Plan that all residential schemes in excess of 50 units should incorporate playground facilities which should be

provided at a rate of 4 sqm per residential unit. According to the **Objective DMS75** of the Development Plan, the Council seeks to:

*“Provide appropriately scaled children’s playground facilities within residential development. Playground facilities shall be provided at a rate of 4 sqm per residential unit. All residential schemes in excess of 50 units shall incorporate playground facilities clearly delineated on the planning application drawings and demarcated and built, where feasible and appropriate, in advance of the sale of any units.”*

In line with the foregoing requirements, the playground provision in the scheme is proposed at a rate of 4 sqm per dwelling, which amounts 2,600 sqm. Thus, it is submitted that the scheme complies with the Development Plan in terms of playground provision. Doyle O’Troithigh Landscape Architects have developed a proposal to provide 14 different play areas throughout the scheme, along with a multi-use game area (MUGA), which was requested by the Parks Department of Fingal County Council.

The play provision includes natural play, incidental play, formal playgrounds, callisthenics units and then play areas designed for the needs of very small children and their parents and guardians within the communal open space provided for apartments and duplex units. Formal play equipment is provided where appropriate as well as along the perimeter nature walk and likely to be an asset rather than a nuisance as play equipment in smaller spaces can be a problem in terms of noise for nearby houses. A local playground is to be provided in the Central Park and the Archaeology Park. Pocket parks offer generous spaces to accommodate an informal kick-about area. A much larger playground with different zones for younger and older children is to be developed in the regional park. This playground is co-located with the playing pitch, MUGA and a trail of fitness stations.



Figure 1. Location of ‘Class 2’ public open space within and adjacent to the development CCK Architects)

Furthermore and from a tree/hedgerow preservation point of view, it is proposed to retain and reinforce the existing hedgerow along the eastern boundary and to complement this with a linear walk set back from the kerb and separated from the hedge by a new herb layer. Halfway along this nature walk is a small pocket park that bellows out forming a loose circle on plan and provides a small informal play space for the nearest residents. The hedge along the southern boundary is in poor condition and has deteriorated very quickly over the last couple of years, whereby existing residents have removed practically all of the vegetation leaving boundaries exposed and vulnerable. It is now proposed that the development backs on to Abbeyvale and Berwick, and that their boundaries are secured by new concrete post and timber panel fences.

Consideration was also given to the retention of the two north-south hedgerows that divide the subject lands into 3 fields south of Main Street. The Landscape Architect consulted the Parks Section of Fingal County Council on the feasibility of retaining and managing these hedgerows within new open spaces: post the Tripartite meeting, 'Central Park' was revised so it might incorporate a 120m stretch of hedgerow and 'Pocket Park 01' was revised to retain two mature ash trees. However, the Parks Section have instructed that the hedgerow be removed and also the two ash trees due to concerns regarding ash die-back. The new public open spaces proposed for Mooretown will compensate for the loss of bio-diversity, in particular the new nature park on the west and southwest boundaries. For further details in this regard, please refer to the Landscape Architects report prepared by Doyle O'Troithigh Landscape Architects.

### 3.2 Item No. 2 – Preparation of a Phasing Plan

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#### ABP Opinion

*"A phasing plan for the proposed development which includes the phasing arrangements for the delivery of the WDLR, public open spaces, surface water management proposals and Part V provision."*

#### Applicant's Response

In terms of delivery of the WDLR and surface water management proposals, Waterman Moylan Consulting Engineers have addressed these items in their engineering pack, which we invite the Board to refer to. However, an overview of these arrangements has been provided below.

It is submitted that a construction programme has not been developed at this stage, however, the development of WDLR, as submitted under Reg. Ref. F20A/0096, is to be constructed in two stages. Accordingly, this will include, in broad terms, the following: -

- **Stage I:** Site clearance and preparation work for the construction;
- **Stage II:** Site development and construction. The development includes all associated site works and infrastructure which includes roads, utilities, foul, and surface water drainage.

The construction programme is intended to be a 4-month programme. It is submitted that the applicant currently proposes to construct the remainder of the WDLR to the southern boundary of his lands in tandem with the proposed Mooretown SHD development

In relation to the stormwater storage tank on foul water network at Balheary Road, it is anticipated that the total construction period for the development will be approximately 3-4 months. Also, the proposed development is likely to be constructed in one phase, which in broad terms, it includes the following: -

- **Stage I:** Site clearance and construction of associated tank infrastructure including drainage, water supply.
- **Stage II:** Construction of drainage outfall to the Broadmeadow.

In terms of delivery of the public open space, it is submitted that this would be completed in tandem with the phased construction of residential units, which is shown on the Figure below. For further details in this regard, please refer to the Allocation of Public Open Space in the Regional Park (drawing 1830-SHD-S-134), Public Open Space (drawing 1830-SHD-S-139), and Architects Phasing Plan (drawing 1830-SHD-S-131) prepared by CCK Architects as part of this SHD application. These drawings are suggested to be read in conjunction with the Architectural and Design Statement prepared by CCK Architects as well.

In relation to delivery of Part V, it is important to note that Part V dwellings are “pepper-potted” across the overall scheme and the Architects Phasing Plan (drawing 1830-SHD-S-131) captures a proportion of the 130 no. proposed Part V dwellings in each phase. Therefore, it is submitted that phase 1 will deliver 53 no. dwellings, Phase 2 will deliver 69 no. dwellings, and Phase 3 will deliver 8 no. dwellings. For further details in this regard, please refer to the Proposed Part V (drawing 1830-SHD-S-130), and Architects Phasing Plan (drawing 1830-SHD-S-131), prepared by CCK Architects. These drawings are suggested to be read in conjunction with Fingal County Council Part V Validation Letter, Part V Indicative Costings, and Planning Statement prepared by Downey as part of this SHD application.

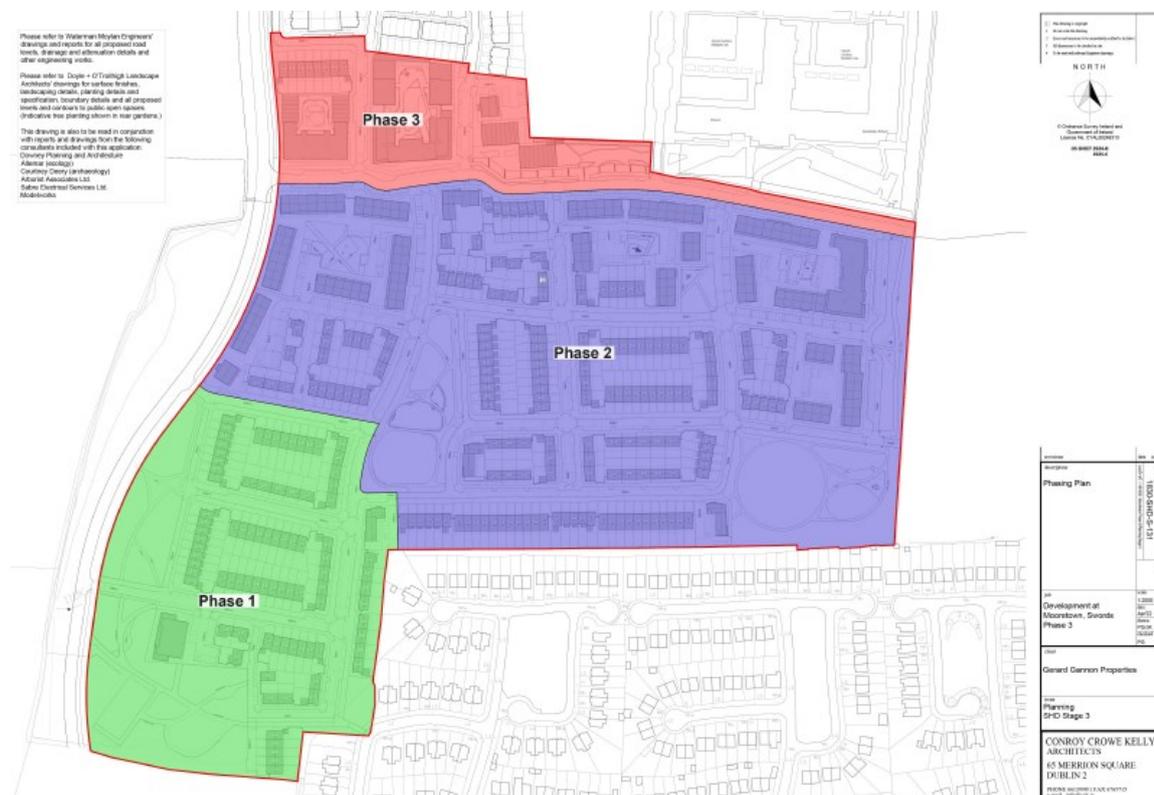


Figure 2. Phasing of the Development (source: CCK Architects)

### 3.3 Item No. 3 – Traffic and Transport Assessment

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#### ABP Opinion

*“Traffic and Transport Assessment including, inter alia, a rationale for the proposed car parking provision should be prepared, to include details of car parking management, car share schemes and a mobility management plan.”*

#### Applicant’s Response

Waterman Moylan Consulting Engineers have fully addressed this response within their engineering pack enclosed with this SHD application, which the Board are invited to refer to. It is worthy to mention that all items noted within the written opinion of the Council’s Transportation Planning Section have been addressed. Also, off-line meetings have been held after the Tripartite meeting with the Council’s Transportation Section (Linda Lally 04/03/22) and the Active travel section (Breen Doris 16/03/22) as required to facilitate appropriate closure on each raised item. As per, a summary of the Fingal County Council’s transportation report items and actions taken is supplied below: -

#### ***i) Parking:***

- Access arrangements to the podium parking and layouts for Blocks A & B, noted as being unclear. Following discussions held with Linda Lally of Fingal County Council’s Transportation Section, the accesses have been updated on plan to reflect clear priority to the pedestrian, creating a shared pedestrian crossing and maintaining concrete path finish at entry points to reenforce this priority to the vulnerable road user (VRU).
- Similarly, access arrangements to parking courts E has been updated on plan to reflect clear priority to the pedestrian, creating a shared pedestrian crossing and maintaining concrete path finish at entry points to re-enforce this priority to the vulnerable road user (VRU).
- Parking Provision - A breakdown on parking provision and the standards applied has been supplied under section 13 of the Traffic and Transport Assessment.

#### ***ii) Road Hierarchy and Layout:***

- FCC noted concerns with respect to pedestrian priority. A review of the layout has been undertaken and following discussions with both Linda Lally and Breen Doris of Fingal County Council Active Travel Section, the line-marking, and signage, junction and entrance priorities have been adapted to ensure priority is with the vulnerable road users, as far as is practical throughout the scheme. In this regard, we refer you to the updated road layout, hierarchy, and line-marking drawings accompanying the submission (drawing P1100-P1104).
- Fingal County Council noted particular concern the installed junction layouts to the 2-way cycle track connecting the school campus and the Western Distributor Link Road. These junctions were installed by the applicant as part of planning permission F14A/0012. In this regard, as part of this submission these junction layouts have been revised and is in keeping with the design details within the NTA’s Cycle manual. We refer you to the updated road layout, hierarchy, and line-marking drawings accompanying the submission (drawing P1100-P1104) and typical example supplied on details

drawing P1100-P1120. Cycle track and footpath at these junctions shall continue through the junction at grade with vehicles required to ramp up to cross the VRU priority zone. Recommendation for further measures to enforce lower speeds. In this regard, a one-way system has been introduced along with raised ramp VRU priority tables at junctions, “slow zone” signage at development entry points and natural speed reducing features (curvature, 1-way proposals and junctions every 70-80m). Also included is on-street parking, which further reinforces a slow speed environment, in accordance with the recommendations of DMURS. In this regard, we refer you to the updated road layout, hierarchy, and line-marking drawings accompanying the submission (drawing P1100-P1104). One way road layout proposals have been presented to Linda Lally of Fingal County Council’s Transport Section and have been welcomed in principal 9 July 2021. Details surrounding self-regulation of speeds were taken on board and nodal points, transitional zones including ramps and shared surface home-zone areas have been implemented to create a self-regulating speed environment.

- Road 1.1.1 – Following discussion agreements with Linda Lally, the layout has been revised such that the crossing of the east-west cycle track is very clearly vulnerable road user prioritised and that the vehicular crossings of this track are required to ramp up to this shared zone of VRU priority. In this regard, we refer you to the updated road layout, hierarchy, and line-marking drawings accompanying the submission (drawing P1100&P1103).

**iii) Bicycle Parking:**

- Parking Provision - A breakdown on parking provision and the standards applied has been supplied under section 14 of the Traffic and Transport Assessment.

- For bicycle locations and accessibility, we refer you to the accompanying architectural submission drawings prepared by CCK Architects.

**iv) School:**

- Consideration of the adaptation of the constructed Main Street (constructed under F14A/0012) that serves the school campus into a school streets/safe street. In this regard, a meeting was held with Breen Doris of FCC active travel, and the items raised at this meeting have been incorporated into this planning submission to adapt Main Street into a safer and slower “School Street”. In this regard, we refer you to Section 6 of this report. We similarly refer you to the updated road layout, hierarchy, and line-marking drawings (drawings P1100 and P1101) and details drawing P1120 accompanying the submission.

**v) Traffic Impact Assessment:**

- Meetings have been held with FCC Transportation Section (Linda Lally 04/03/22), and the Active travel section (Breen Doris 16/03/22) where the importance of high-quality cycling and pedestrian linkages was discussed. In this regard, over and above the VRU priority focus discussed above, the cycle linkages to the wider network are developed in drawing P1005 accompanying the submission package.

- We further note in this regard, that a Travel Plan has been prepared as part of this package submission and is supplied under separate cover. This Travel Plan presents how the proposed

development will seek to reduce demand for and use of cars by increasing the attractiveness and practicality of other modes of transport.

**vi) Taking-in-charge:**

CCK Architects have addressed this in their Architecture Pack, in particular Taking in Charge Layout (drawing 1830-SHD-S-129), which identifies all areas proposed to be taken in charge by the local authority.

**vii) Swept Path:**

We refer you to the refuse vehicle swept path layout drawing 21-011-P1110 prepared by Waterman Moylan Consulting Engineers.

**viii) EV Charging:**

Waterman Moylan Consulting Engineers have addressed this in section 13 of the accompanying Traffic and Transport report, which is suggested to be read in conjunction with the Car Parking Key (drawing 1830-SHD-S-132) prepared by CCK Architects. These are submitted to demonstrate the EV parking provision figures and their locations throughout the scheme.

All residential house parking spaces shall include EV charging provision in the form of cable ducting and capacity on distribution boards, in accordance with current building regulation. Ducting and services provided as part of the proposed development shall be installed to facilitate non-disruptive retro fitting of EV charging points in accordance with the requirements of current Building regulation. It is proposed to supply 72 communal charging spaces, in excess of the 10% minimum identified in FCC's Stage 2 opinion.

**ix) Oldtown Mooretown LAP, Phasing, and associated infrastructure requirements**

Extent and Delivery requirements of the Applicant to be agreed. In this regard, a meeting was held with Linda Lally of the Fingal County Council Transportation Department with respect to the wider transportation infrastructural works outlined within the expired Oldtown/Mooretown LAP, on the 4<sup>th</sup> of March 2022. We refer you to section 6 of this report, identifying:

- Works complete to date by the applicant,
- Works to be undertaken by the applicant, or
- Works outside of the development boundary and remote from the site have been identified as not under the applicant's remit.

### **3.4 Item No. 4 – Sunlight, Daylight, & Overshadowing Analysis**

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**ABP Opinion**

*“A Sunlight/Daylight/Overshadowing analysis showing an acceptable level of residential amenity for future occupiers and existing residents, which includes details on the standards achieved within the proposed residential units, in private and shared open*

*space, and in public areas within the development and in adjacent properties. This report should address the full extent of requirements of BRE209/BS2011, as applicable.”*

### **Applicant’s Response**

Waterman Moylan Consulting Engineers have addressed this response by preparing a standalone report on Daylight, Sunlight, and Overshadowing Assessment, which we invite the Board to refer to. However, the following provides an overview of the results and findings of this assessment.

#### ***i) Average Daylight Factor - Proposed Development***

It is submitted that the average daylight analysis for the proposed the development evaluated the living/kitchen/dining space and bedrooms across all apartment blocks A to F and duplex blocks A to V. The results of the ADF analysis demonstrate the following:

- Combined living/kitchen/dining areas across the scheme demonstrate levels of daylight above the BRE recommended 2% average daylight factor with 100% of the kitchen/living/dining spaces achieving compliance.
- The living areas across the scheme demonstrate levels of daylight above the BRE recommended 1.5% average daylight factor with 100% of the kitchen/dining spaces achieving compliance
- The bedrooms across the entire scheme demonstrate levels of daylight above the BRE recommended 1% average daylight factor with 100% of the bedrooms achieving compliance.
- Overall, across the scheme, 100% of the spaces analysed demonstrate compliance with the BRE daylighting levels.

#### ***ii) Sunlight to Proposed Communal Spaces & Pocket Parks***

The results of the sunlight analysis to the communal amenity areas and pocket parks are as follows:

- The communal amenity areas demonstrate levels of sunlight above the recommend 2 hours over 50% of the area on the design test day 21st March. The communal amenity areas in blocks A and B were deemed to be the worst performing spaces due to communal area enclosure within each apartment block and due to shading on three sides, however these spaces are shown to be fully compliant with the BRE requirements of more than 50% sunlight > 2 hours on March 21<sup>st</sup>.
- All other communal amenity areas and pocket parks identified receive significantly more direct sunlight due to their positioning within the development and less obtrusive shading from surrounding apartment blocks.

#### ***iii) Overshadowing Impact on the Proposed Development***

The results of the overshadowing impact analysis on the proposed development are as follows:

- The overshadowing analysis of the proposed properties illustrates the various shadows cast at four key dates (March 21<sup>st</sup>, June 21<sup>st</sup>, and December 21<sup>st</sup>) and the impact the proposed development may have on these properties at particular times of the day illustrated in Figures 34 to 67.

- The overall shadowing analysis identifies negligible impact on the properties in the proposed development.

#### **iv) Impact on Surrounding Properties**

The Visible Sky Component (VSC) and Annual Probable Sunlight Hours (APSH) analysis that was completed for three existing properties adjacent to the subject site demonstrate full compliance with the BRE guidance. The results of this analysis are as follows:

- The VSC analysis demonstrates that the proposed development has no significant daylight impact to existing adjacent dwellings.
- The APSH analysis demonstrates that the loss of sunlight will not be noticeable as both the annual and winter results (when the modelled with the proposed development included) will meet the recommended BRE Guidelines.

### **3.5 Item No. 5 –Materials & Finishes**

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#### **ABP Opinion**

*“Report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, pathways, entrances, boundary treatment/s and Village Centre. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development. The documents should also have regard to the long-term management and maintenance of the proposed development and a life cycle report for the apartments in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2018).”*

#### **Applicant’s Response**

CCK Architects have addressed this response within their Architecture Pack and a standalone report submitted as Materiality and Finishes, which the Board are invited to refer to. This report specifically addresses the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, pathways, entrances, boundary treatment(s) and Village Centre. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development. It is also submitted that with respect to the requirements of long-term management and maintenance of the scheme and in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (Dec. 2020), a Life Cycle report has also been prepared by CCK Architects, which we invite the Board to refer to for further details and information. The following provides a synopsis on the general finishes and material palette proposed as part of the scheme. These are suggested to be read in conjunction with the plans, sections, and elevation drawings, and Urban Design and Architectural Statement prepared by CCK Architects, and CGI’s and Photomontages prepared by Digital Dimensions for further details on the designs, materials, and finishes

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

It is submitted that the proposed material and finishes to the scheme will be of the highest quality. Care has been taken for the design of the private and public realm to ensure high quality and sustainable finishes and details which will create a distinctive character for the development. The proposed development will form a sustainable design solution for this site. Achieving design quality is key to ensuring this residential development provides both durability and performance throughout the duration of its life. The quality of the private and public realm of this development is key to having a successful neighbourhood. High quality design and a clear green infrastructure will be applied to all perimeters of the proposed building, with particular attention to the materials and façade design used in all parts which overlook the street frontages and public realm. The detailing and specification for materials and finishes has taken into account the micro-climate of sunlight, daylight, wind to ensure a design solution that is robust, fit-for-purpose and will be of the highest quality over its design life. This development has been designed in order to ensure that robust and long-life materials and products with low maintenance are selected as much as possible. Material selection has gone through a selection process to ensure the proposed materials will meet the highest lifecycle value. Equality the sustainability credentials of the selected materials has been reviewed thoroughly to ensure optimum design solutions. The use of robust high quality landscaping materials for this site is intended to provide materials that reduce the need for ongoing maintenance costs. Materials have been selected based on the value they bring in terms of low maintenance and easy cleaning and their aesthetic value. The chosen cladding materials will be robust and good detailing shall ensure minimal staining on façades. Hard wearing internal finishes are selected to ensure the buildings remain robust. Resilient materials have been selected for balconies, paving areas, and for all external accessible areas. The selection of external materials will minimise maintenance as all materials are self-finished, robust, and long lasting.

### 3.6 Item No. 6 – Visualisation & CGI's

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#### ABP Opinion

*“Additional Computer-Generated Images (CGIs) and visualisation/cross section drawings showing the proposed development in the context of the existing residential properties surrounding the site and the proposed development at key landmark views.”*

## Applicant's Response

Digital Dimensions and Model Works have addressed this request within their respective packs which include CGI's and Photomontages, which the Board are invited to refer to. This is suggested to be read in conjunction with the plans, sections, and elevation drawings, and Urban Design and Architectural Statement prepared by CCK Architects.

### 3.7 Item No. 7 – Community & Social Infrastructure Audit

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#### ABP Opinion

*“An updated Community & Social Audit indicating the likely additional demand for community facilities and the available capacity to accommodate this demand.”*

#### Applicant's Response

In response to the foregoing item requested by the Board, Downey have prepared an updated Community & Social Infrastructure Audit enclosed with this SHD application. The report outlines the range of services and facilities that are available within the immediate vicinity of the subject lands and discusses their capacities to accommodate the proposed scheme. This includes early childcare and educational facilities, leisure and recreational amenities, community and religious services, healthcare, and retail provision. It also provides an overview of the demographic profile of the area where the subject site is located at.

Based on these detailed assessments, the audit reveals that there is a suitable quantity and available capacity of early childhood care and educational facilities in the surrounding area to cater for the needs of the future residents of the scheme. There is also a good level of accessibility to both primary and secondary schools, with the Swords Campus College and Broadmeadow National School located to the northern boundaries of the subject lands. In addition to this, the proposed scheme provides for a childcare facility (512 sqm) capable of accommodating c. 102 pre-school children, and this is further supported by the proposed childcare facilities provisioned as part of the live application on developing Oldtown lands (by the same applicant - Case Ref. ABP-307498-20), which provides for 1 no. childcare facility of 519 sqm capable of accommodating circa 102 children. Therefore, it is considered that there is sufficient available capacity within Mooretown and surrounding environs to cater for the proposed scheme.

It is noteworthy to mention that a School Demand Assessment and Childcare Provision Assessment have also been prepared by Downey as part of this SHD application, which the Board are invited to refer to. This is to provide a detailed indication of current childcares and schools' capacities and available demographic data in the assessment area, together with the emerging demand of the proposed development to ensure there is sufficient capacities catering the cumulative demand arising from the scheme and its wider community.

In terms of recreational amenities, there is a significant array and variety of indoor and outdoor recreational facilities and amenities within close proximity of the site. Broadmeadow and Ward River Linear Parks are located in the proximity of the site and provide for a wide range of activities that include recreational walks, community gardens, and generous parklands. As part of the overall

scheme, there are several pocket parks, and public green spaces within the proposed development. Moreover, the future Swords Regional Park is in the vicinity of the subject lands.

In relation to retail offerings, there is a wide range of commercial and retail shops within accessible distances of the subject lands, including the new Miller's Glen retailer centre providing a convenience store, retailer shops and café, as well as the creche and plaza pertaining to the 'Village Centre' character area of the Oldtown LAP lands. In addition to this, the proposed scheme provides for a number of retail units and café, which would cater for the influx of new population into the area as well as current residents. The new population will further support the existing shops and will assist in the consolidation of the retail core and surrounding areas.

In light of the foregoing, Downey are of the considered opinion that there is generally sufficient capacity of community and social infrastructure to cater for the proposed development. The proposed development will also help to sustain the existing facilities, assist in the completion of the wider residential scheme for the Mooretown lands, and support a sustainable development of Mooretown within Swords. For further details in this regard, please refer to the enclosed Community and Social Infrastructure Audit prepared by Downey.

#### 4.0 NOTIFICATION OF AUTHORITIES

The Board also requested that, pursuant to Article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the following authorities should be notified in the event of the making of an application arising from this notification in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

- Irish Water
- Transport Infrastructure Ireland
- National Transport Authority
- Minister for Culture, Heritage, and the Gaeltacht (built heritage)
- Heritage Council (built heritage)
- An Taisce - the National Trust for Ireland (built heritage)
- The relevant Childcare Committee
- The Department of Education and Skills

Downey can confirm that the above list of bodies has all been notified of the making of this planning application and copies of the relevant correspondence to them are included under separate cover as part of this application to the Board.

#### 5.0 CONCLUSION

This Statement of Response to An Bord Pleanála's Notice of Pre-Application Consultation Opinion indicates how the specific information requested by An Bord Pleanála has been addressed and identifies the source or location of the response within the accompanying planning submission documentation.

The relevant prescribed authorities identified in the pre-application consultation opinion from An Bord Pleanála have also been notified of the submission of the planning application in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

The proposals incorporated into the final scheme, and in particular, due consideration has been given to the 2 items requiring further review/design amendments which has resulted in a high-quality development being presented to An Bord Pleanála for approval. It is submitted that the further documentation and additional studies undertaken and now being submitted, further support this application for Strategic Housing Development at south of Rathbeale Road, Mooretown, Swords, Co. Dublin.

In light of the foregoing, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with the relevant national, regional and local planning policies and guidelines.