

D C W N E Y

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

Proposed Strategic Housing Development

**Lands at Oldtown, Swords,
Co. Dublin**

Applicant: Gerard Gannon Properties

March 2022

TABLE OF CONTENTS

1.0	INTRODUCTION	3
2.0	ITEMS FOR FURTHER CONSIDERATION & AMENDMENTS	3
2.1	Item No. 1 – Design and Layout.....	3
2.2	Item No. 2 – Height and Density.....	7
3.0	SPECIFIC FURTHER INFORMATION	8
3.1	Item No. 1 – School Demand Assessment	8
3.2	Item No. 2 – Social and Community Infrastructure Audit.....	9
3.3	Item No. 3 – Landscaping Plan.....	11
3.4	Item No. 4 – Visualisation and CGI’s	11
3.5	Item No. 5 – Ecological Surveys	11
3.6	Item No. 6 – Archaeological Assessment.....	12
3.7	Item No. 7 – Waste Management.....	13
3.8	Item No. 8 – Taking in Charge.....	13
3.9	Item No. 9 – Housing Quality Assessment (HQA)	14
3.10	Item No. 10 – Transportation Assessment	14
3.11	Item No. 11 – Drainage Details	17
4.0	NOTIFICATION OF AUTHORITIES.....	18
5.0	CONCLUSION	18

© Downey 2022

Downey Planning Document Control			
	Name	Date	Version
Prepared by	Elahe Saki MIPI Consultant Planner	08/01/2022	DRAFT_V01
	Elahe Saki MIPI Consultant Planner	22/03/2022	DRAFT_V02
Approved by	Eva Bridgeman MIPI Director	12/01/2022	DRAFT_V01
	Eva Bridgeman MIPI Director	31/03/2022	FINAL_V02

1.0 INTRODUCTION

This Statement of Response accompanies a planning application to An Bord Pleanála for a proposed Strategic Housing Development on lands at Oldtown, 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 6th July 2020, with An Bord Pleanála subsequently accepting the Section 5 pre-application consultation request. The pre-application consultation meeting was then held virtually via Microsoft Teams on 30th November 2020. On 16th December 2020, An Bord Pleanála issued the notice of pre-application consultation opinion for the proposed development, under case reference ABP-307498-20.

Having regard to the above, the opinion states that An Bord Pleanála *“following consideration of issues raised during the consultation process, and having regard to the opinion of the planning authority, An Bord Pleanála is of the opinion that the documentation submitted requires further consideration and amendments to constitute a reasonable basis for an application for strategic housing development to An Bord Pleanála.”* and notes 2 no. items to be further addressed prior to submission of 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 11 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 – Design and Layout

ABP Opinion

“(a) Further consideration/justification of the documents as they relate to the layout of the proposed development particularly in relation to the 12 criteria set out in the Urban Design Manual which accompanies the above-mentioned Guidelines and the Design Manual for Urban Roads and Streets. The matters of arrangement and hierarchy of streets; the configuration of the layout; connectivity with adjoining lands; provision of hierarchy of open space and the creation of character areas within a high quality scheme should be given further consideration.

(b) Further consideration/justification of the documents as they relate to the extent of surface parking proposed and arrangement of same and the impact this may have on the vitality of the streetscape and quality of the proposed development.

(c) Further consideration and/or justification of the documents as they relate to the elevational treatment/expression and materials/finishes of the proposed development, having regard to the context of the site and the desire to ensure that the proposed development makes a positive contribution to the character of the area over the long term. An architectural report and urban design statement should be submitted with the application. A Building Lifecycle report should also be submitted in this regard, which includes an assessment of the long term running and maintenance costs associated with the development in accordance with Section 6.13 of the 2018 Guidelines on Design Standards for New Apartments.”

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. For further details regarding the open space provision within the scheme, please also refer to the enclosed drawings and report prepared by Doyle O’Troithigh Landscape Architecture.

In relation to the sub-item (a),

The proposed development is 3km from the centre of Swords, 12km from Ashbourne and just under 5km from the M1 motorway interchange which provides access to Dublin City Centre situated c. 19km or 25-minute driving distance from the subject lands. It is immediately accessible from the Rathbeale Road, from Miller’s Avenue (Western Distributor Link Road) (partly open and also currently used as a construction haul road but ready to fully open in tandem with the proposed scheme), and from the new Meadowbank phase of Miller’s Glen. Miller’s Avenue will ultimately link Lissenhall and the M1 in the northeast to Brackenstown Road and the Ward River Valley in the southwest, giving the proposed development excellent access to the wider environment of Swords.

With respect to the above, the proposed development provided multiple connections to Miller’s Glen across Miller’s Avenue (WDLR), 5 in total. Safe pedestrian crossing points across the avenue have been located by the consulting engineers to tie neatly into the path and street network on the east side of the avenue. From here, it is a 250 metres or 3 minutes walking distance to the civic square, shops, and school campus.

Road 1 of the proposed development connects directly into the existing road (Meadowbank Road) that runs along the perimeter of the regional park from Park Avenue to the northeast extremity of the Oldtown site. Road 1 completes the perimeter road frontage to the regional park to the west boundary before tying back into Miller’s Avenue.

A number of pedestrian and cycle connections into the regional park are proposed along the western edge of the development and through the circular open space at the northeast boundary. As part of a scheme to enhance wider connectivity and especially walking routes, a pedestrian connection is proposed from the Rathbeale Road along the west boundary of Apartment Block C.

In terms of arrangement of the foregoing connections, this is submitted to be in a clear hierarchy of primary, secondary and tertiary streets, all of which are connected, permeable and integrated with the existing urban development, the regional park and the wider area (see Figure below).



Figure 1. Proposed Connection within the Hierarchy of Street Network in the Scheme

It is important to note that the key design principles of DMURS, in the likes of connected networks, multi-functional streets, pedestrian-focus design, and the close collaboration of the design team were foremost in mind when designing the proposed scheme.

The layout is configured to maximise physical and visual connections between the existing/permitted phases of Miller's Glen and the regional park which will run the full length of the subject site's west and north boundaries. The WDLR is a potential barrier in any urban environment but has been traffic-calmed by design, using the principles of DMURS to better integrate into Miller's Glen urban street network. Multiple junctions, both staggered and crossroads, horizontal deflections, parallel on-street parking, active frontage, street trees and soft landscaping contribute to a more pedestrian-friendly street.

Open space proposed within the subject lands has a clear hierarchy ranging from small, intimate pocket parks unique to their character area (Park 2 and the shared surface space linking Roads 1.1 and 2.1), to the large central open space which is ideal for kick-about and active uses (Park 3). Additional open space is provided contiguous to the development and the regional park (Park 1 and Park 4), which provides a natural amenity for the wider neighbourhood as well as the new residents of this development. Linear and buffer spaces unsuitable for active or amenity uses are proposed to be planted for bio-diversity and have not been included in the calculation of open space. Additional open space in the form of active Class 1 open space is to be provided further north as part of the Regional Park. Drawings indicating the location and quantity of open space are provided, and the details of these are described and scheduled in Section 8.0 of the Urban Design & Architectural Statement.

Consideration has been given to greater definition and variation of character areas within the proposed development, and how these relate to the existing Miller's Glen development. There are broadly 3 character areas, within which subtle variations make transitions from one to the other:

- (i) the higher density, taller section to the south,
- (ii) (ii) the mid-density development of 2-3 storey houses and 3-storey duplex clustered around the central open space and
- (iii) (iii) the park-side neighbourhood with its landmark building and organic street pattern tracing the irregular line of the townland boundary. Details of the character areas are described in Section 5.5 of the Urban Design & Architectural Statement.

In relation to the sub-item (b),

The parking strategy for the development has been considered and revised to reduce the extent of surface parking proposed and to mitigate against its visual impact. Basement and podium or covered parking is not economically viable for this development but there are other means of providing sufficient, convenient, and attractive parking courts at ground level, in the likes of undercroft parking for the apartment blocks, high-quality landscaping, a mix of on and off-street parking bays, reduced parking rates and the provision of Go-Car. The proposed layout and streetscape are more varied and attractive as a result of these interventions, and it is considered that the visual impact has been addressed. A parking schedule has been prepared by CCK Architects in the Urban Design & Architectural Statement, which we invite the Board to refer to for further details in this regard.

In relation to the sub-item (c),

The external materials and finishes of the proposed new buildings have been chosen with regard to their maintenance, robustness, life-span and availability. Clay bricks, painted render (through-colour render is very difficult to maintain and repair), concrete tile, and zinc are perfectly matched to these requirements and perform well in the east coast climate. Details and specification at tender and construction stage will have regard to the long-term appearance of the building, particularly where eaves or facade projections must be designed to avoid staining. Consideration is given to the colour and texture of materials specific to building types and to character areas where distinct variations are appropriate. For further details in this regard, please refer to the enclosed Urban Design and Architectural Statement enclosed with the application. Also, in accordance with Section 6.13 of the Apartment Guidelines 2020 and in response to the foregoing item requested by An Bord Pleanála, A Building Lifecycle report has been prepared by CCK Architects as part of the architecture pack submitted within this SHD application, which we invite the Board to refer to.

2.2 Item No. 2 – Height and Density

ABP Opinion

“Further consideration/justification of the documents as they relate to the height and density of the proposed development. This consideration and justification should have regard to, inter alia, the minimum densities provided for in the ‘Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas’ (May 2009) in relation to such sites, together with guidance in relation to height contained in the Urban Development and Building Heights, Guidelines for Planning Authorities (2018). Particular regard should be had to need to develop at a sufficiently high density to provide for an acceptable efficiency in serviceable land usage given the location of the site and its proximity to the Key Town of Swords and with its established social and community services. The further consideration of this issue may require an amendment to the documents and/or design proposal submitted.”

Applicant’s Response

In terms of building height, consideration has been given to create a variety of building heights across the proposed development and the scheme has been revised in this regard. The introduction of 3-storey duplex blocks and new 3-storey house types provide variety, defines important street corners and public spaces, increases the range of residential typologies, and works to define different character areas.

Building heights now range from single storey (the creche wing) to 5-storeys, with taller elements located at the very north of the site overlooking the regional park (Apartment Block A), and in the southern section at the Rathbeale Road crossroads. Apartment Block B1 is located at the T-junction of the Glen Ellan Road and Miller’s Avenue (WDLR), closing the vista with a 4+ penthouse storey apartment block. Apartment Block C1 marks the northwest corner of Miller’s Avenue (WDLR) and the Rathbeale Road which is a new crossroads and will be a busy interchange. Apartment Block C was the subject of discussion in terms of its relationship with the busy crossroads and its role as the “gateway”

building into Swords from the west. Apartment Block C is a small building that steps from 4+ penthouse on the crossroads to 4 and then 3 storeys on the west side. The step-change is in consideration of the row of 12 single storey hip-roofed houses on the Rathbeale Road, known locally as “the 12 apostles”. These houses are to the south and west of the proposed development, and are not directly opposed by Apartment Block C. They would not be overshadowed by the new development, but nevertheless cognisance is made with regard to the transition in building height between them and Miller’s Glen. The height change is aided by another “step” from the 3-storey shoulder to a brick archway and pedestrian path leading to the regional park. It is considered that the revisions to the form and grain of this building address the dual need to mark the beginning of Swords and the entrance to Miller’s Glen while respecting the scale of the existing cottages. For further details regarding the proposed building heights of the development, please refer to the enclosed Building Height drawing, elevations, and Urban Design and Architectural Statement prepared by CCK Architects.

In terms of density, the initial concept of the proposed scheme comprised 339 dwellings (179 houses, 160 apartments, and a creche) on the net development site area of 8.13 hectares. This was a net density of 41.7 dwellings per hectare. The Opinion of An Bord Pleanála has been considered and the scheme has been revised to now provide for 377 dwellings (173 no. houses, 134 no. apartments, and 70 no. duplex units [comprising 35 no. duplex ‘house’ units and 35 no. duplex ‘apartment’ units]) and a creche. This is a new net density of 48.3 dwellings per hectare on a development site area of 7.80 hectares. The Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (May 2009) recommends a net density in the range of 35-50 dwellings per hectare on “Outer Suburban/Greenfield” sites and the proposed development falls comfortably in the higher end of the range. The Oldtown-Mooretown Local Area Plan (2010, expired 2020) requires a net density range of 35-50 dwellings per hectare with higher density in the upper end of this range in pockets around the Local Centres and main streets, and adjoining the Broadmeadow Linear Park. The proposed development generally complies with the objectives of the LAP, albeit now expired. The overall density has been increased by the provision of new 3-storey duplex blocks woven into the urban plan, located on street corners and overlooking public spaces where height and intensification of development is required.

In light of the above, it is considered that this is the appropriate density for the subject lands having regard to their integration and relationship with the existing and permitted pattern of development in Miller’s Glen, their location at the very western edge of Swords and their remove from high-quality public transport nodes and corridors. For further details in this regard, please refer to the drawings and Urban Design and Architectural Statement prepared by CCK Architects.

3.0 SPECIFIC FURTHER INFORMATION

3.1 Item No. 1 – School Demand Assessment

ABP Opinion

“A report identifying demand for school places likely to be generated by the proposal and the capacity of existing schools in the vicinity to cater for such demand.”

Applicant's Response

In response to the foregoing item requested by An Bord Pleanála, Downey have prepared a "School Demand Assessment Report" enclosed with this SHD application. The report provides a detailed assessment of the existing school provision within the subject area, as well as the future demand arising from the proposed development, thus assessing the current capacity of the surrounding environs as well as whether the existing facilities would be sufficient to cater for the proposed development.

This Assessment identifies primary schools and post-primary schools located within the assessment area, which is defined as Swords-Lissenhall, Swords-Glasmore, and Swords Village ED's. It then provides a detailed evaluation of maximum and available capacities of the schools, as well as their catchment area, defined as the walkable distances to these facilities. With respect to the generated demand by the scheme and demographic profile of the area, the combined schooling needs of children from the proposed development is expected to be 174 no. school places. As per the assessment, in terms of primary school needs within the assessment area, there are currently 4,604 school places to cater for primary school population of the area. In 2023, should the population follow the same growth path that 2011-2016 intercensal figures, the demand for primary school places will be 3,277 no. pupils. An additional 110 potential pupils are expected to be derived from the proposed scheme. This suggests an overall of 3,387 pupils by 2023, which falls well below the actual enrolment figures mentioned above. In terms of post-primary school needs within the assessment area, there are currently 3,222 school places to cater for post-primary school population of the area. In 2023, should the population follow the same growth path that 2011-2016 intercensal figures, the demand for primary school places will be 1,686 pupils. An additional 64 potential pupils are expected to be derived from the proposed scheme. This suggests an overall of 1,750 pupils by 2023, which falls well below the actual enrolment figures mentioned above.

In light of the above, it is submitted that the current provision of educational facilities in the area can sufficiently cater for the town's future population and the influx of population arising from the proposed development, and therefore, the scheme is considered to be consistent with the relevant policies and guidelines. For full details regarding the existing capacities and demand projections, please refer to the enclosed School Demand Assessment Report prepared by Downey under a separate cover.

3.2 Item No. 2 – Social and Community Infrastructure Audit

ABP Opinion

"Social Infrastructure Audit."

Applicant's Response

In response to the foregoing item requested by An Bord Pleanála, Downey have prepared a "Community and Social Infrastructure Audit" enclosed with this SHD application. The report outlines the range of services and facilities that are available within the surrounding area of the subject site and discusses their capacity to accommodate the proposed development. This includes a full audit of the existing early childcare and educational facilities, recreational facilities including indoor and

outdoor facilities, retail provision, healthcare facilities, and religious and community provision within the assessment area, defined with 2km radius of the subject lands. Lastly, an overview of the demographic profile of the electoral division where the proposed scheme falls under have been provided.

As per the assessment, 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.

In addition to this, the proposed scheme provides for a childcare facility with an overall area of 519 sqm capable of catering c. 102 pre-school children. With respect to the 2001 policy document of 'Childcare Facilities: Guidelines for Planning Authorities', a benchmark provision of 1 no. 20 space childcare facility per 75 dwellings is required. This would provide for a requirement of c. 100 childcare spaces, however, in the context of the 'Sustainable Urban Housing: Design Standards for New Apartments' (2020), "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". Excluding the 1-bedroom apartment/duplex units from the overall provision for 377 no. residential units, this leaves a total of 279 no. units that can be deemed to accommodate families and that would require c. 74 childcare places as per the Guidelines.

With regard to the aforementioned, the proposed childcare facility stands well above the Guidelines requirements. At this juncture, it is important to note that the proposed development is anticipated to generate a requirement of 63 no. childcare spaces when utilising the demographic trending of the area over 2011-2016. Therefore, the proposed childcare facility would provide more than sufficient capacity to not only serve the emerging community, but also its wider context. For further details in this regard, please refer to the enclosed Childcare Provision Assessment Report prepared by Downey.

In terms of recreational facilities and amenities, there is a significant array and variety of indoor and outdoor amenities within proximity of the subject lands. Also, the subject site is located adjacent to the future Swords Regional Park, and therefore, the design of the proposed development has taken cognisance of the proximity and has created links throughout the lands for improved accessibility to the Regional Park. Additional open space is also provided contiguous to the proposed development and the regional park, which provides a natural amenity for the prospect residents of the scheme, as well as its wider community. In relation to retail offerings, two local centres of Applewood and Rathbeale Road along with the "Village Centre" of Phase 1 development of Oldtown, which is now open and operating, are located within accessible distances of the subject lands. The proximity to this range of accessible retailer shops is expected to 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, and support a sustainable development of lands within Oldtown-Moretown lands, and its wider environs. For further details in this regard, please refer to the enclosed Community and Social Infrastructure Audit prepared by Downey.

3.3 Item No. 3 – Landscaping Plan

ABP Opinion

“A detailed landscaping plan for the site which clearly sets out proposals for hard and soft landscaping including street furniture and play areas where proposed, and which includes detailed proposals for the area of zoned public open space, included within the red line boundary.”

Applicant’s Response

Doyle O'Troithigh Landscape Architecture have addressed this request within their landscape pack, which the Board are invited to refer to. This demonstrates the landscape proposals, including hierarchy of open space provision, hard and soft landscaping, detailed specifications, etc. Please also refer to the enclosed Urban Design and Architectural Statement prepared by CCK Architects.

3.4 Item No. 4 – Visualisation and CGI’s

ABP Opinion

“Additional CGIs, visualisations and cross sections, as necessary, which clearly show the relationship between the proposed development and existing development in the immediate and wider area.”

Applicant’s Response

Model Works have addressed this request within their Verified Photomontages and CGIs booklet, which the Board are invited to refer to. A verified photomontage has also been prepared by Digital Dimensions in relation to the proposed stormwater storage tank works included as part of the proposed development. Please also refer to the enclosed detailed cross sections, and Urban Design and Architectural Statement prepared by CCK Architects.

3.5 Item No. 5 – Ecological Surveys

ABP Opinion

“Ecological Surveys.”

Applicant’s Response

OPENFIELD Ecological Services have addressed this request within their Ecology Pack, which the Board are invited to refer to. Site visits were carried out on the 17th of May 2018, August 27th 2020 and October 21st 2021. The site was surveyed in accordance with the Heritage Council’s Best Practice Guidance for Habitat Survey and Mapping (Smith et al., 2010). Habitats were identified in accordance with Fossitt’s Guide to Habitats in Ireland (Fossitt, 2000). The nomenclature for vascular plants is taken from The New Flora of the British Isles (Stace, 2010) and for mosses and liverworts A Checklist and Census Catalogue of British and Irish Bryophytes (Hill et al., 2009). Both May and August lie within the optimal survey period for general habitat surveys (Smith et al., 2010) and so a full classification of all habitats was possible. May is also within the season for breeding birds, Badgers, Otters, bats and amphibians. August is within the bird breeding season but is suboptimal. OPENFIELD carries out bi-

monthly site visits, which include some of the application lands, and these observations have been used to supplement the data in this analysis. It was possible to classify all habitats on the site to Fossitt level 3. A series of wintering bird surveys were carried out between November 2021 and March 2022 by Hugh Delaney, a freelance Ecologist. On ten dates surveys were undertaken from sunrise to sunset, recording all bird behaviour.

For further information in this regard, please refer to the Appropriate Assessment Screening Report and NIS prepared by OPENFIELD Ecological Services; the wintering birds survey 2021-2022 report prepared by Hugh Delaney, and the EIAR submitted as part of this application.

3.6 Item No. 6 – Archaeological Assessment

ABP Opinion

“Archaeological Assessment.”

Applicant’s Response

Courtney Deery Heritage Consultancy Ltd. have addressed this request within their chapter of the Environmental Impact Assessment Report (EIAR) prepared as part of the application. The non-technical summary for the chapter reads as follows:

The cultural heritage impact assessment was prepared by Courtney Deery Heritage Consultancy as part of the pre-planning of Strategic Housing Development (SHD). The report assesses the impact of the proposed development on the cultural, archaeological, and archaeological heritage environment and proposes measures to safeguard any monuments, features, finds of antiquity or features of architectural or cultural heritage merit. The proposed development, Phase 5, is located within the northwestern section of the Oldtown Mooretown Local Area Plan (LAP) lands. One registered archaeological monument (RMP/SMR site); a large-ditched enclosure, was identified through a programme of archaeological testing in 2013 and is situated in the northeast of the Phase 5 application lands (RMP no: DU011-150). It is being preserved in situ within an open green space. Two additional sites, a probable cereal drying kiln and a pit were discovered within the application lands during archaeological testing in 2017 and additional features were identified during monitoring of topsoil stripping of the area in 2018. These features were all subsequently excavated under licence (17E0446).

The southern portion of the application area has been considerably disturbed due to the construction of a temporary school in that location. It was concluded after the geophysical survey of this area that the archaeological potential of the anomalies it identified was limited and given the shallow depth of topsoil in the test trenches to the north of the school, it is unlikely that archaeological features or material will have survived the construction activity. There are, however, some areas that may remain undisturbed by the construction and given the proximity of subsurface enclosure DU011-135 and the additional archaeological features identified during monitoring to the north of the school, this will require remedial measures.

It is recommended that topsoil removal within the southern portion of the Phase 5 lands be monitored by a suitably qualified archaeologist. After the removal of the existing amenities in this area, the archaeologist will determine if it is necessary to monitor further groundworks. In the event of any archaeological features remaining beneath these structures and surfaces, the area will be cordoned

off and protected until the archaeologist has decided on how best to deal with the remains in consultation with the DHL.

It is recommended that the removal of the Oldtown/Rathbeal townland boundary within the proposed development area be monitored by a suitably qualified archaeologist with the provision that in the event of any further archaeological remains being identified, the area is cordoned off and protected until the archaeologist has decided on how best to deal with the remains in consultation with the DHLGH. It is further recommended that heavy machinery movements related to this phase of development not encroach on the recorded archaeological monuments in the adjacent field to the west and that if construction activities, including soil movements and storage, are to take place in the field to the west, the archaeological monuments should be fenced off for their protection. There are no structures of architectural heritage merit within the application area or in its environs.

For further details in this regard, please refer to the enclosed EIAR.

3.7 Item No. 7 – Waste Management

ABP Opinion

“Waste management details.”

Applicant’s Response

In accordance with the Apartment Guidelines 2020 and in response to this item requested by An Bord Pleanála, Enviroguide Consulting have prepared an Operational Waste Management Plan (OWMP) for the scheme, which the Board are invited to refer to. This provides for waste generation and storage across the scheme by the building type, waste collection, and its management system. As per the Plan, by implementing design and actions outlined in the OWMP, a high level of recycling, reuse and recovery will be achieved at the development in line with European targets. Recyclables and organic waste will be segregated at source to reduce the quantity of residual waste materials requiring off-site recovery or disposal. It is submitted that the source segregation of waste types as detailed in the OWMP report will help to achieve the targets set out in the EMR Waste Management Plan 2015-2021. The design of the waste storage area will meet the requirements as detailed in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities. For further details in this regard, please refer to the enclosed Operational Waste Management Plan prepared by Enviroguide Consulting. In addition, Waterman Moylan Consulting Engineers have prepared drawings demonstrating the swept-path analysis for a refuse vehicle.

Waterman Moylan Consulting Engineers have also prepared a preliminary Construction Demolition Waste Management Plan (pCDWMP) and an additional preliminary Construction Environmental and Waste Management Plan (CEWMP) for the proposed development.

3.8 Item No. 8 – Taking in Charge

ABP Opinion

“A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority. Streets should be shown up to the boundary to facilitate future access.”

Applicant's Response

CCK Architects have prepared a separate drawing titled 'Taking in Charge – Dwg. No. 1736-SHD-S-131' marking the proposed areas to be taken in charge by the local authority. The Board are invited to refer to the submitted drawing within the architectural pack.

3.9 Item No. 9 – Housing Quality Assessment (HQA)**ABP Opinion**

“A housing quality assessment which provides specific information regarding the proposed apartments, and which demonstrates compliance with the various requirements of the 2018 Guidelines on Design Standards for New Apartments, including its specific planning policy requirements. This should also include a schedule of floor areas for all proposed units, clearly setting out the aspect (single, dual, triple) of each unit.”

Applicant's Response

CCK Architects have prepared a detailed Housing Quality Assessment (HQA) that accompanies the architectural pack submitted with this SHD application, which the Board are invited to refer to. This comprises of separate HQA sheets for the proposed houses, apartments, and duplexes, including the provisioned number of bedrooms and bedspaces, floor area, aggregate living area, living/dining width, aggregate bedroom area, storage area, aspect, orientation, and private open space, all compared against the Section 28 Guidelines requirements. For further details in this regard, please refer to the enclosed HQA prepared by CCK Architects.

3.10 Item No. 10 – Transportation Assessment**ABP Opinion**

“Additional transportation details having regard to the requirements of the Transportation Planning Division as contained within Appendix 2 of PA Opinion.”

Applicant's Response

Waterman Moylan Consulting Engineers have addressed this request within their engineering pack, which the Board are invited to refer to. All items noted within the FCC Transportation Planning Section Stage 2 report, dated as being lodged on 7 July 2020, have been noted and addressed. Liaison has been held with Niall Thornton of FCC Transportation, following the Tripartite meeting, initially on 14 January 2020, as required to facilitate appropriate closure on raised items. A summary of the transportation report items and actions taken is supplied below:

- Fingal County Transportation Planning Section noted in their SHD Stage 2 departmental report that the proposed car parking made provision for minimum practical parking requirements and similarly made commentary around the creche parking provision. In this regard, a detailed parking breakdown and assessment has been supplied under section 14 of the accompanying Traffic and Transport Assessment, detailing the provision and standards applied. An allowance of 3 in-curtilage staff parking spaces has been made for the creche building (4 classroom 519sqm), and 5 dedicated and 1 shared parking spaces for drop off have also been afforded.

- Fingal County Transportation Planning Section similarly noted in their SHD Stage 2 departmental report that the proposed bicycle parking was below national standards. In this regard, a detailed bicycle parking breakdown and assessment has been supplied under section 15 of the Traffic and Transport Assessment (TTA), supplied under a separate cover, detailing the provision and standards applied. A Provision/bed allowance has been made in accordance with the “Design Standards for New Apartments” as detailed under sections 15.2 and 15.3 of the TTA.
- For bicycle locations and accessibility, we refer you to the accompanying architectural submission drawings, supplied under separate cover.
- Fingal County Transportation Planning Section similarly noted issues in their SHD Stage 2 departmental report with respect to the parking layout to the apartment street level parking. This area has been fully redesigned to afford appropriate access and a high-quality streetscape, as has been further developed within the architectural and landscape architectural submissions, supplied under separate cover. Appropriate room has been afforded to access parking spaces at the end of the parking bays and allowance has been provided to facilitate all turning movements, including that of fire tender and refuse vehicles, without the need for kerb overhang or parking bay encroachment. In this regard, we refer you to the refuse vehicle swept path layout drawing 17-144-P1105. Similarly, concerns with respect to duplex units facing the ball pitches have been addressed through layout re-design. In this regard, we similarly refer you to the accompanying architectural and landscape architecture submission drawings. Likewise, concern at corner blocks with respect to potential overhang of footpath has been addressed in this final layout submission to ensure sufficient in-curtilage space is afforded for two vehicles.
- Taking in charge – We refer you to the accompanying CCK taking in charge layout identifying all areas proposed to be taken in charge. The watermain wayleave afforded to Irish water over the 800mm trunk water main has been identified on the engineering watermain layouts P1300-P1303. It has been ensured that the wayleave for this critical piece of trunk infrastructure remains within public lands. A section of the 800mm main encroaches into the subject lands and as noted within the pre-connection response, it will be required of the Developer to demonstrate that proposed structures and works will not inhibit access for maintenance or endanger structural or functional integrity of the infrastructure during and after the works. In this regard, the internal layout of the proposed development site has been designed such that the wayleave is within roadway and outside of proposed building lines. Parking areas associated with the duplex Block D/house units fronting Miller’s Avenue are accessed off Road 8 that runs parallel to Miller’s Avenue, separated by a biodiversity open space. This permits an efficient means of integrating the 800mm trunk watermain wayleave that encroaches the Phase 5 site in this location. As regards the secondary road surrounding the creche which is less than 5.5m in width, per prior discussions at the Tri-partite meeting with FCC Transportation Planning, this is a 1-way road which also facilitates safe access/egress to the creche/duplex drop off spaces.
- Swept Path - We refer you to the refuse vehicle swept path layout drawing 17-144-P1105. It has been ensured that vehicle overhang and parking bay overrun has been avoided and suitable turning movements afforded throughout.

- Traffic and Transport – Fingal County Transportation Planning Section noted in their SHD Stage 2 departmental report comments with respect to trip generation calculations and the use of Census data. Per prior liaison with FCC Transportation planning, the following is noted:

- Trip generation has been calculated using TRICS Person trip rates for the Mixed Residential Development ‘Flats and Houses’ category and applying Census 2016 Modal Split to derive the multi-modal trips. One of the concerns raised by FCC noted that the calculated trips might be underestimated as “Flats” trip rates tend to be lower than “Apartments” trip rates. This concern was noted and a new consultation of TRICS Database was undertaken. In this consultation it was observed that TRICS Software does not include an option for “Apartments”, and instead uses the term “Flats”, which has been considered synonymous to “Apartments” – See print screen below.

Vehicle Surveys	
Survey Type	No. of Surveys
Manual Count	341
Directional ATC Count	297

Multi-Modal Surveys	
Survey Type	No. of Surveys
Manual Count	229

- Another raised concern in relation to trip generation calculation, is the Census 2016 Modal Split being applied to the calculated Person Trips to derive the all-mode trips (including car trips). This concern is noted, and the used methodology has been revised. The revised calculation has been based on TRICS Car trip rates as opposed to TRICS Person trip rates. With the car trips calculated, the bus, train, walk and cycle trips will then be estimated based on Census 2016 Surveyed Modal Split and on the 2027 Modal Split for Oldtown/Mooretown area contained in the South Fingal Transport Study – Swords Sub Report (2019) prepared by SYSTRA on behalf of FCC. Note that, the Car trips have been calculated after TRICS Car trip rates and the remaining trips (train, bus, walk, cycle) have been estimated based on the best available Modal Split trends for the area.
- Electric Vehicle Charging – 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. The proposed non-residential development for the creche building includes a total of 9 no. parking spaces so one functioning charging point (capable of serving 2 parking spaces) will be provided and future provision for at least 1 no. other spaces will be required. Since the development will also include Part M compliant accessible spaces, the location of the charging point will be such that it can serve one accessible parking space

and one standard parking space. The proposed multi-unit residential development includes a total of 600 no. parking spaces, so in accordance with current building regulation requirements, future ducting provision for all duplex units and apartment spaces will be required. 30 no. communal EV charging spaces have indicatively been afforded, as broken down within section 14 of the TTA, meeting the 10% EV requirement requested in the FCC Transport Stage 2 opinion. We refer you to the accompanying architectural submission for detail of the indicative locations. 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

- Road Safety Audit – Road Safety Audits shall be carried out at the relevant stages as outlined in the current edition of TII guidelines GE-STY-1027, and we note that a Stage 1 Audit has been carried out and appended as Annex C of the Engineering Assessment Report.

For further information in this regard, please refer to the Engineering Assessment Report and accompanying documentation prepared by Waterman Moylan Consulting Engineers.

3.11 Item No. 11 – Drainage Details

ABP Opinion

“Additional drainage details having regard to the requirements of the Drainage Division as indicated in their report contained Appendix 2 of PA Opinion. Any surface water management proposals should be considered in tandem with any Flood Risk Assessment, which should in turn accord with the requirements of ‘The Planning System and Flood Risk Management’ (including associated ‘Technical Appendices’).”

Applicant’s Response

Waterman Moylan Consulting Engineers have addressed this response within their Engineering pack, which the Board are invited to refer to. The Fingal County Council Water Services Planning Section report deemed the submission acceptable subject to a couple of standard conditions. We supply the following additional information to address the FCC Water Services Stage 2 report items raised:

- Foul Sewer – Upgrade of the network required to facilitate connection. We refer you to section 3.2 of the Engineering Assessment Report in this regard which outlines the proposed foul infrastructure upgrade works necessary to facilitate the subject development
- Foul Sewer - Statement of Design Acceptance - We refer you to section 3.2 of the Engineering Assessment Report in this regard and included as Annex D of that report.
- Water - Statement of Design Acceptance - We refer you to section 5.2 of the Engineering Assessment Report and included as Annex D of that report.
- Surface Water – Opportunity for Green Roofs. Green Roofs shall be supplied to the apartment blocks as noted in Section 4 of the Engineering Assessment Report.

It is noted that a Flood Risk Assessment has been carried out and accompanies this submission package. Surface Water management proposals have been considered in tandem with Flood Risk Assessment. A Flood Risk Assessment has been carried out in accordance with the DEHLG/OPW Guidelines on the Planning Process and Flood Risk Management published in November 2009. This

assessment identifies and sets out possible mitigation measures against potential risks of flooding from various sources. Sources of possible flooding include coastal, fluvial (river), pluvial (direct heavy rain), groundwater, and human/mechanical errors.

For further information in this regard, please refer to the Flood Risk Assessment Report and accompanying documentation prepared by Waterman Moylan Consulting Engineers.

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
- Department of Culture, Heritage and the Gaeltacht
- National Transport Authority
- Transport Infrastructure Ireland
- Irish Aviation Authority
- Dublin Airport Authority
- 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 consideration/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 Oldtown, 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.