

Planning Application: **SHD/020/19**

Case Number: **306771**

Case Name: 172 no. apartments. Site of The Former Lord Mayor's Public House,
Main Street, Swords, Co. Dublin.

Site size: 3.4 acres 1.4 hectares

Submission on Behalf of Cllr Dean Mulligan (Fingal County Council, Dublin Fingal)

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To whom it may concern:

With reference to the above Planning Proposal I wish to object on the following grounds:

Planning Process Complaints:

This is a point regards the process of observation, consultation and how I personally feel it is very poor and not transparent, straight ford nor easily accessible.

- Local authorities have an online element to their respective consultations, which makes access, payment, the process and security of such safer, easier and transparent. The SHD process is in complete contravention to this:

An example of this process regards in my opinion it having clear flaws:

The Strategic Housing Development (SHD) process is a deliberate fast track planning submission process, in this case it was made on the 27th Feb but only appeared on pleanala.ie 10th March although the SHD website was up on date stipulated which is not much use if one had not seen the physical site notice with a deadline of 1st April, therefore only giving just 3 weeks to prepare objections. This was confounded by the error in the first planning permission site notice issued and subsequently rectified a minor typo which appeared in the original site notice which did not stipulate the number of 3 bed units which was corrected. In retrospect the deadline for submissions should have been increased in line with the republication of the accurate site notice. Essentially the site notice should have an accurate 5 week timeline in conjunction with accurate 5 week notice period for observations and or objections. All the above is furthered by the clear lack of care given to public health in the midst of COVID19 outbreak where councillors in Fingal County Council asked for the deadline to be frozen and or pushed out given the social distancing measure which makes it difficult to hand-deliver objections to An Bord Pleanala, 64 Marlborough Street.

Strategic Housing Development (SHD) legislation

From the outside looking in the SHD legislation could be argued as a positive process to fast track much needed housing in the midst of a housing crises, however in my opinion the weak legislation that is the Planning and Development (Housing) and Residential Tenancies Act 2016; Planning and Development (Strategic Housing Development) Regulations 2017 is a mechanism that has proven to manipulated the need for housing into a profit driven mechanism with little to no consideration regards developing housing as part of a sustainable environment and in keeping with local council development plans nationally. The SHD process should not allow developers go above and beyond what would be permitted in this instance by the Fingal County Council Planning Department. We cannot continue to manipulate developments which are in complete contravention to the real need for additional housing and additional apartments for Swords. It is imperative this be done correctly and not in a way that will

cause further problems down the line through lack of amenities and over-development. With the above in mind we need to state clearly that:

- 1. Firstly:** I believe this is a disingenuous attempt to lower expectations for future planning applications
- 2. Secondly:** Any development at this location should adhere to the Fingal Development Plan and be consistent with the Swords Masterplans agreed by Councillors in May 2019. This development should not be permitted to overreach and go beyond the spirit of this Development Plan and these Masterplans.
- 3. Thirdly:** This proposed development is a clear manipulation of one and two beds and sizes 50sq and 80sq (51sq and 79sq) on a site spanning 1.4 hectares or 3.4 acres this represents a serious overdevelopment of the site. These plans far outweigh the pre-existing land use and unit per hectare ratio outlined in the [Sword Master plan May 2019](#). When we compare it to Fosterstown master plan, which would be in close proximity and also have a shared site line to the south of Swords village. Fosterstown key objectives note 105-115 units per hectare ([Fosterstown master plan](#) p.12) where this SHD notes 142 units per hectare ([Architectural Design Statement](#) p.11).

•Furthermore the Architectural Design Statement for this SHD in its Key Design Principles/Design Development notes the Swords Master plan 2009 as being a key document, however this master plan is outdated and current the master plan 2017-2023 specifically the updated [Sword Master plan issued in May 2019](#), should be the keynote reference documents.

The Lord Mayors Building:

Although the site is in private ownership, the people of Swords want a say in how it is developed due to its proximity to the Main Street, the history of the surrounding area and the lasting impact this proposed development would have on the character of the town.

With reference to the Architectural Heritage Assessment:

2.3 The Lord Mayor Public House

The only building currently on the site is the Lord Mayor Public House and its associated outbuildings and carpark. The structure is a two and three-storey white rendered commercial property, finished in a modern thatched roof. The central part of the structure dates from the late nineteenth century with significant late twentieth century modifications and extensions to the north, south and west including a 2-storey structure to accommodate additional retail and storage space (off-licence). The Lord Mayors does not possess sufficient special interest to warrant retention. Extensive interventions, confusion and loss of character are apparent, and no significant historic building fabric remains.

Refer to *Architectural Heritage Assessment Report* prepared by Clare Hogan, Conservation Architect.

The above pays some reference to the age of the structure, when we look at structures in the area that currently have a retention order or are protected structures, in accordance with [Part IV of the Planning and Development Act 2000](#) a protected structure is a structure that

“the planning authority considers a special interest from an architectural, historical, archaeological, artistic, cultural, scientific, social or technical point of view”.

This site has never been evaluated with respect to whether it should be considered a protected structure. It is speculated that there may have been some sort of ‘Sheebeen’ or Mud Hut dating back to 1668, however it is as stated in the assessment as a matter of fact that there was a built structure at this location since the late 19th Century. This assessment stipulates that

‘The Lord Mayors does not possess special interest to warrant retention...’

I fundamentally disagree with this point The Lord Mayors building is not just a landmark, but a symbol of Swords and denotes the entrance way into a heritage town, in line with the local development plan. The building could easily be incorporated into any new build the way the old Dublin City Point Depot building was and feel vindicated given the numbers [See petition results](#) who have subsequently signed the petition asking for this building to be retained. I feel it does warrant special interest on the grounds of **architectural** and **social** point of view, given the clearly expressed lived experience from residents and the age of the building structure and its standing in Swords Main Street within the built environment and surroundings.

Use of the Development:

With reference to the Architectural Heritage Assessment:

1.2 Strategic Context:

The Applicant aims to deliver a high-quality development to accommodate and support a growing community in Swords, providing apartments for young families, people looking to live in close proximity to public transport and the amenities and civic facilities provided in Swords town centre. This statement should be read in conjunction with the application drawings, the Pre-planning Statement of Consistency & Planning Report, and all other material that forms part of this application.

When considering the use of this site and the form of accommodation and residents it will attract we need to take into account the aforementioned size of each unit which is small, this makes them unattractive for downsizing and would appear to be aimed at the private rental sector when Swords needs quality units for downsizing and quality family homes.

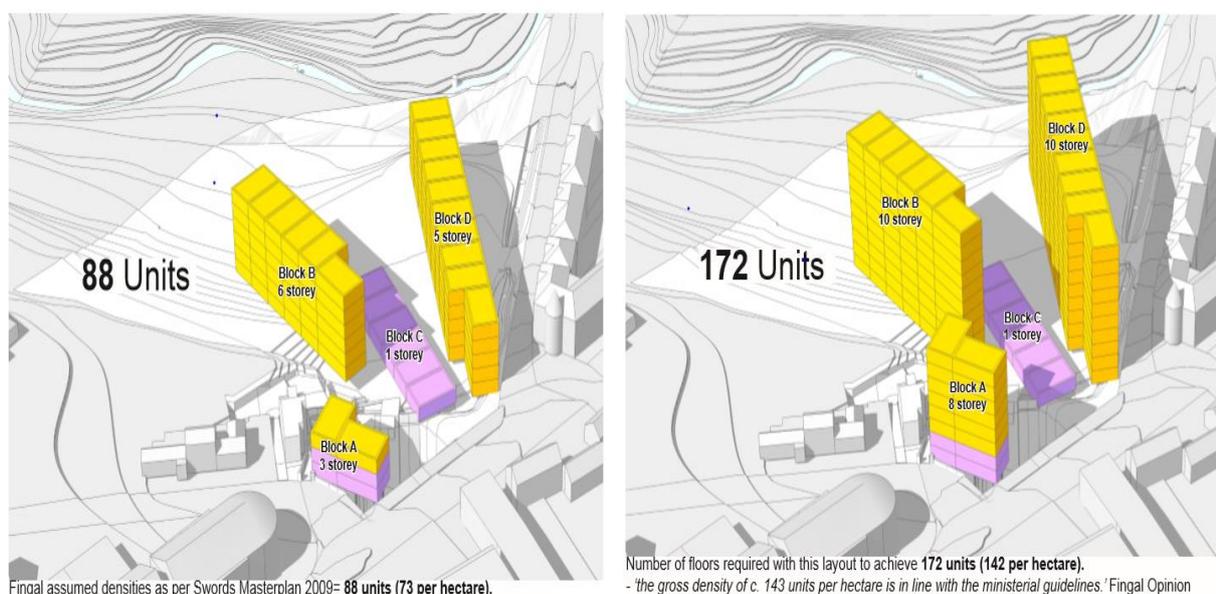
What should or could happen but won't is you have acknowledge that there is a time bomb need for one and two beds to allow older people to downsize and free up three and four bed properties, also for social housing in terms of older citizens who are presently working and paying high rents who won't be able to continue paying high rents in the private sector when they retire. They will not be able to access these developments either, as the number of social and affordable units is going to be too small along with the actual size of the units. With that said these units are as quoted in the above '*strategic context*' intended for '*young families*' they are not suitable for such, but it is what they are '*considered*' for, therefore it further reiterates the actual lack of real understanding of the housing need in the area in which the SHD process nationally has failed to consider as it is essentially profit and developer lead.

Density and Size of Development:

The recommended and stated maximum net density in the [Swords Masterplan](#) (p.2) issued in May 2019 is 110 units per Ha. There is a slight variation in that the Fosterstown developed may exceed this number to reach a maximum of 115 per Ha but could be anywhere between 105 and 115 ([Fosterstown master plan](#) p.12). The aforementioned [Architectural Design Statement](#) (p.11) notes densities per Ha as being 142 and states that "*this in keeping with ministerial guidelines in 'Fingals opinion*" in any of the documented correspondence I cannot find any minuted or written communication from Fingal County Council or any member of its executive or relevant departments which supports this claim?

It is however, as noted earlier in complete contravention to the Swords Master Plan of 2019. The design statement uses the 2009 Swords Master plan as a key objective which is far from the most up to date document with respect to the current environment.

See Diagram used below used as part of [Architectural Design Statement](#) (p.11).



The vast differences with respect to each diagram is a clear indicator of the overdevelopment proposed even if the masterplan alluded too is out of date. This proposed SHD would see a 35% increase on the units per Ha ratio stated as a maximum in the Swords Master plan 2019, this is simply not acceptable, it is not in keeping with the environment, need or character of the area.

The idea put forward and argued is that high density development is warrant or as noted in the density strategy 3.6 of the [Architectural Design Statement](#) “*lends itself towards high density development*”. It alludes to public transport as a factor to warrant such density that will be discussed further within the observation. Much of the site is zoned “Major town centre” and this is taken into account in the Swords Master plan so why are the densities proposed in such completely ignored? Not only does this SHD not accurately take into consideration the views of a rigorous consultation process that took place in the master plans development. It also disregards the framework proposed by a panel of expert planners, along with experts from all relevant sectors as well as public reps who developed this master plan. The results of which our completely contravened by the views of one architect employed by Jacko Development to do just that, attempt to falsely justify and manipulate the need, use and requirements for such overdevelopment.

Access and Circulation

The development will improve the approach and access from Main Street through to Ward River Valley Park and create a welcoming entrance. The landscaped communal garden and openness to the park beyond provides the opportunity to create a rich transitional experience inviting residents and visitors into the heart of the development. The positioning and form of the buildings should amplify this experience. Car access is via Church Road to the north east of the site, and cars are directed to the basement parking lot via ramp access.

As per consultations with Fingal County Council (FCC) several issues were raised in regards the densities and building alignment, particularly relating to space between building, size and orientation. The sentence “*creating gateway access to the Ward River Valley...*” is used to describe this proposals plan to develop and fit within the environment in keeping with the views and surroundings of the greater Ward Valley Park. In this regard I feel “words look great on paper” but when we look at “additional visualisations” as requested by the FCC we see 3D views of the ‘open space’ and ‘gateway’ to the Ward Valley Park. These views show just how out of touch this plan really is with reality



([Architectural Design Statement](#) P.31)



([Architectural Design Statement](#) P.27)

I feel these 3D views speak for themselves more like a “[concrete jungle](#)” as described by Dublin Live newspaper article. The site as displayed in imagery, is set in a beautiful greenspace surroundings, which is prime land to develop as both accommodation and public amenity, however this SHD is a clear manipulation and overdeveloped with the only goal being profit.

4.7 Elevation Strategy and Materials

As described earlier, the site slopes down from Main Street towards the river. The stepping roof line helps to negotiate this topography. It allows the building to present a lower, active edge to [Church Road](#), while maximising the potential for density on the site.

Road Access: Movement and Transportation

The issue regards roads and access is highlighted in many aspects of this planning development from [Consistency & Planning Report](#) the [Architectural Design Statement](#) and [Statement and response to pre planning consultation](#):(p.3-7). The central issue is surrounding the “church road”. It is mentioned over 55 times in reports relating to this SHD. The SHD site as per ‘*site notice*’ and section ‘2.2 Development site: Location and Access’ ([Architectural Design Statement](#) p.6) is located directly between the aforementioned Ward River Valley Park and Church Road. Access to the ward valley was noted above, however access to and from Church Road, notwithstanding the pre-existing difficulties with the road at present is a major concern with respect to this SHD.

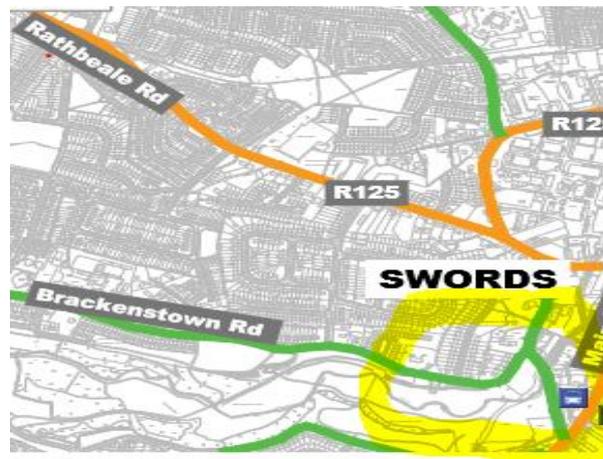
It must be stated as a matter of fact and clearly noted that the **only vehicular access and exit point for this proposed site is that of Church Road**. Some observations relating to church road in its present form that this SHD has not or fails to acknowledge include:

• **Firstly**, The junction of church road and main street is already at max capacity and heavily backed up during peak times. Church Road is a major thoroughfare for Swords Manor, and all estates off the Brackenstown Road to get to and from Swords Village. To develop 172 new units, exiting and entering this site at peak times is lunacy. This is noted in the [Swords Masterplan](#) (2019, p.15-17)

Road Improvements

The Development Plan seeks to implement the following:

- Swords Western Relief Road
- Swords Western Distributor Road
- R125 Rathbeale Road Improvements
- Swords-Brackenstown Link
- Completion of Airside to Feltrim Link Road
- Fosterstown Link Road
- Forest Road Improvements
- Green Link across the Ward River Valley



The area highlighted in yellow is the bottle neck which the Swords- Brackenstown link intended on dealing with along with the initiative cycleway proposed.

• **Secondly**, Cooldriona court apartments which are the apartments directly opposite the site on the church road as you exit the current Lord Mayors car park. From Cooldriona carpark you enter onto one way road left of fork on church road only turning right, which makes these apartments viable. However when you add the addition of this SHD and main Swords Manor and Brackenstown traffic which will access church road which predominantly take the right of fork on church road. This is as stated above directly opposite the site entrance proposed, in so doing you are adding to the two lanes of traffic already oversubscribed and all vehicles exiting site to exit and/or enter swords will have to cross one lane on church road which is already a traffic backlog at peak

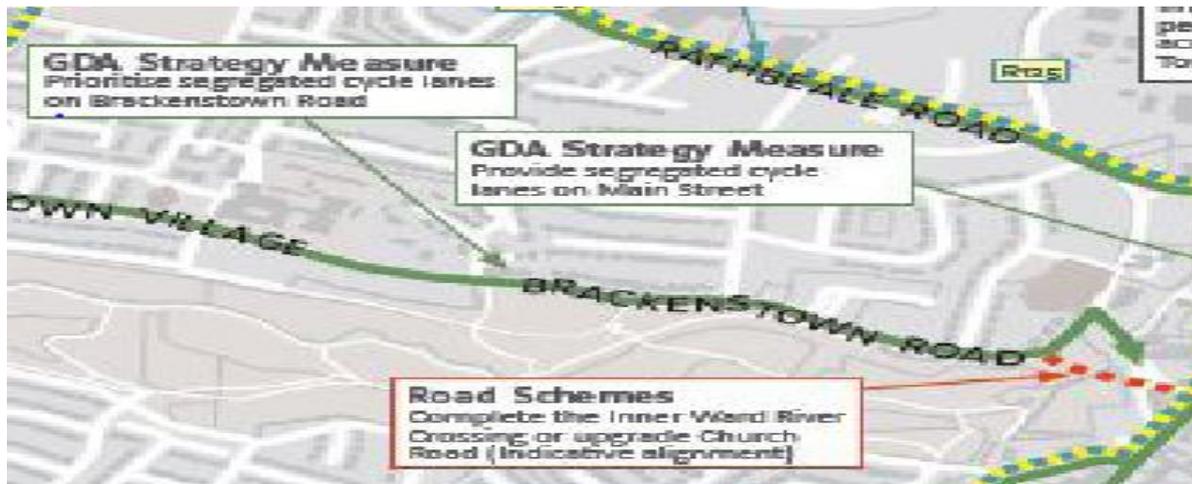
times, this makes no sense. The argument that the Lord Mayors had a constant traffic flow bares no weight as it was mainly in late evening and not during peak times which will be the prime use for this and any housing development on this site going forward.

- **Thirdly**, the addition of the newly developed 'care choice' nursing home has added to the traffic on church road, causing a further back log on what is a narrow and dangerous road.

- **Fourthly**, the question must be asked how all construction vehicles and workers plan on attain site access during the development phase, with a particular emphasis on HGVs, and the viability of them ascertaining access to and from church road. It has to be stressed there must be no vehicular access to this development from the Bells lane at the entrance to Highfields.

- **Fifthly**, how is it proposed delivery trucks for these 172 new apartments can stop, to retro fit and provide furniture etc for the homes. As it will not be viable to enter the basement car park. Where will they stop?

Finally, I note cycle spots in excess of 408, however cycle routes to and from site aren't clear? Well particularly vague, if you intend on using the church road with the above taken into account it is laughable and the Ward River Valley Park does not have the appropriate entrance and exits at present for it to accommodate such cyclist traffic. Essentially there must be a much wider footpath (and potentially a cycle-way as provided for in masterplan) all the way around from the current Lord Mayor's Pub boundary on the Forest Road, wider footpath around the corner on to Dublin Road and then a wide footpath and cycle-way on the southern side of Church Road, where there is no path at present. It is imperative that the Forest Road / Dublin Road / Church Road junctions need to be made safer. Safe walk-way cycle way from Forest Road traffic lights through, around this development towards Brackenstown Road, without having to cross traffic (Church Road). Removal of sharp corner at Forest Road, wider corner & footpath to be provided with safer pedestrian path in mind. We cannot have the new developments right up to the boundary. Meanwhile the indicative cycle track in the [Swords Masterplan](#) (p.17) is obliterated by the proposal. See below:



The above is taken from the [Swords Masterplan](#) and it clearly indicates the intention to “prioritise segregated cycle lanes on Brackenstown road and main street using church road”. Most importantly as this SHD completely ignores the “completion of inner Ward River Valley Crossing or upgrade Church Road (indicative alignment)” essentially meaning it would cut across a sub section of this SHD lands to create a more sustainable and appropriate road link from Brackenstown to Swords Main street.

The only point in any of the documents, which notes or gives credit to the difficulties on regards access on church road relates to ‘Bin Storage’. It describes how weekly bin collections “...will be facilitated via ramp without disturbing traffic on church road” ([Architectural Design Statement](#) p.21). In gives little or no more info on this topic, one would assume access to and from the site is via Church Road, as reiterated above the likelihood of bin trucks and HGVs having easy access via church road in its present state is lunacy.

A simple example with respect to difficulties of church road is the considerable illegal parking which is a constant theme which enforcement of fines has not eradicated. See below:



This picture taken from a location to the rear of the proposed site, currently a vacant car park as an example of the issues and lived experience of people residing in the area regards access on church road. The footpath is narrow and with the addition of cars can not facilitate buggies, wheelchairs etc. Narrow footpaths on this section of church road mean that people can not walk two a breast in most instances so with the addition of cars illegally parked it further reiterates the dire need for upgrade of this road as outlined in the Swords Masterplan 2019, which is completely ignored in this report.

Therefore, I firmly believe that any proposed development utilising church road must complete the objectives outlined above from the Swords Master plan. The road in its present form is not fit for purpose and any development allowed to go ahead without significant remediation and upgrade to church road is an absolute disgrace and is a risk to public safety.

Car Parking

The reservation of 408 bike spaces but only 132 car spaces does not make any sense. It will lead to surplus parking on nearby streets. As expressed above (N.B. parking on church roads illegally on pathway is major issue for warden and Gardaí alike at present).

132 (6 of which are disability) car spaces is insufficient. Developers claim 500+ residents will occupy this site, which is:

- 0.264 car parking spaces per person
- 0.6 spaces per unit
- 1 for every 4 occupants

The idea that this is sustainable or viable is ridiculous, as noted in the [Consistency & Planning Report](#) (p.6). The Fingal County Council state that “a *minimum of 1 car parking spot per unit*”. Whatever way this proposal wants to frame it particularly emphasising the public transport links proposed as grounds for having such a small parking facility, this is Ludacris. We need to promote other modes of transport, but the current environment does not have the appropriate public transport and infrastructure to facilitate anything less than 1 space per unit. On this ground alone this SHD should not be granted in its present form.

Public Transport

The issue regards public transport is discussed in many aspects of this planning development from [Consistency & Planning Report](#) the [Architectural Design Statement](#) and the [Statement and response to pre planning consultation](#):

“...Given the existing and proposed (the metro?) public transport network serving Swords, the subject site constitutes a Central and/or Accessible Urban Location and the car parking provision proposed is appropriate in this instance.”
([Architectural Design Statement](#), p.46)

It further states;

“this is a unique development...given its prime...central village location”

This statement refers to accessibility of public transport. This is phrased in my opinion to justify the serious lack of car parking spaces and the inadequacies that the accessibility via church road offers. A few observations in this regard include:

- **Firstly**, this is not a unique development. There is a bus stop 3 mins from any point in swords and surrounding areas.
- **Secondly**, what is required is investment in real public transport, metro-link phase one should be a precondition to this central village location being utilized for a much-needed housing development. If we want to meet the brief to attract young families to the area, we need appropriate accommodation in a sustainable environment which this SHD is not.
- **Thirdly**, living close to Swords village increases the number of buses passing but may not increase frequency to your desired location.
- **Finally**, a development of this scale should be contingent on MetroLink getting final planning permission in 2021.

With due consideration to the public transport arrangements that this location offers, I feel it is integral that the car park spaces are increased in line with the Swords master plans. Furthermore, any large-scale development in a central village location should in order to create a sustainable environment be contingent on phase one of MetroLink going ahead prior to any construction or development on site (i.e. money been drawn down and utilised to start the development of metro, not simply agreed in principle).

The Ward River Valley Park

As briefly noted in terms of densities and the impact such high rise will have on the greenway proposed in the Swords Masterplan 2019. To reiterate the sentence “*creating gateway access to the Ward River Valley...*” this is accurate but more like gated community bordering the Ward River Valley as noted in [Architectural Design Statement](#) (p.24). This development is not exposing the Valley park as is proposed in the local development plan or masterplans but instead creating a narrow access point, hidden behind a seven-story apartment complex. This will adversely affect the views & ambience in the park.

In my opinion developers are exploiting this substantial public amenity conveniently on their doorstep for their own gain. There is no doubt that apartments which are essentially inside the park, will have increased value. The views and surroundings particularly in building A & B which are proposed 6 & 7 stories would be beautiful, ideal for profit, whilst destroying the environment it surrounds.

It is interesting when it is considered that part, of the north western portion of the site that is Zoned HA (High Amenity) is needed by the Council, if it is to implement the plans for longer term development of the park and related cycleways. The planning application is silent as to how that parcel of land is to be treated; apart from its inclusion as part of the landscape planting proposal, somehow justifying it is in keeping with the greenway strategy proposed by FCC. This is not the case and paying lip service is not a justifiable condition to rail road this SHD through.

As described in the [Architectural Design Statement](#) (p.6) the site slopes 8 metres from the Main Street end, down to the north western end. The apartment blocks are designed to increase in scale; 4 floors on Block D, 6 floors on Blocks A & C and 7 floors on Block B. It is argued that this hierarchy of scale is designed to reduce the visual impact of the development as it is viewed from Main Street. However, what the application fails to deal with is the stark visual impact of the apartment blocks when viewed from the Ward River Valley Park. From there, the nearest elements of the scheme will be Block A (6 floors) and Block B (7 floors). Added to that, we have to factor in that the park itself continues to slope away towards the Ward River. So, most visitors to the Park will, in future, find the Blocks towering over them at the point where they first begin to engage with nature; the first area of traversable grassland nearest to Swords Main Street. The image provided on [Architectural Design Statement](#) (p.31) of the Architectural Design Statement fails to show the full impact that these blocks are going to have on the Park.

One of the biggest selling points proposed is in reference to the to both [Architectural Design Statement](#) and [Consistency & Planning Report](#) emphasises that the blocks of

apartments are laid out in such a way as to minimise the developments impact on neighbouring residential areas, e.g. “no buildings to the south of the site, to preserve the amenity of the small scale houses on Forrest Road”. It has to be expressed clearly that the angle of the building and the layout was changed based on initial talks with FCC, even so this proposal still disregards the natural landscape of its surroundings. Furthermore, no allowance has been made for the need to preserve the amenity of the small scale housing on Bells Lane; which will clearly be dwarfed by Blocks A & B (see image below as seen on -[Architectural Design Statement](#) p.27).



In my opinion as stated above this development contradicts the longstanding objective of FCC to open the entrance to the Ward River Valley Park for the benefit of everyone in Swords. Instead, it creates a narrow access point, hidden behind an apartment complex, which is not acceptable.

Heritage & Surrounding Aesthetic

It is quite surprising that in the [Consistency & Planning Report](#) (p.35) that the report asks the question:

“How do the proposals create a sense of place?”

The answer being they do not which I will elaborate on below.

(vi) Distinctiveness - How do the proposals create a sense of place?

The proposed development, through contemporary design will create a positive addition to the identity of the locality, which will serve as a high-quality distinct development of moderate scale on a brownfield site which is presently severely underutilised.

The proposed building at this location on Main Street and Church Road will have a strong identity and become a distinctive and recognisable place. The proposed building adopts a generous setback from the site’s south-eastern corner to create a plaza which will provide a direct link to Ward River Valley Park to the north of the site. This plaza features a totem sign which provides a clear indication of the newly created through route to the Ward River Valley Park.

The Ward River Valley Park is far from the only high-quality heritage or significant aesthetic feature that this proposed development intends on overlooking. What this SHD is right about is that it would be a “*distinctive and recognisable place*” because it

is a concrete jungle not in keeping with the surroundings. There are a few considerable observations to be made in this regard:

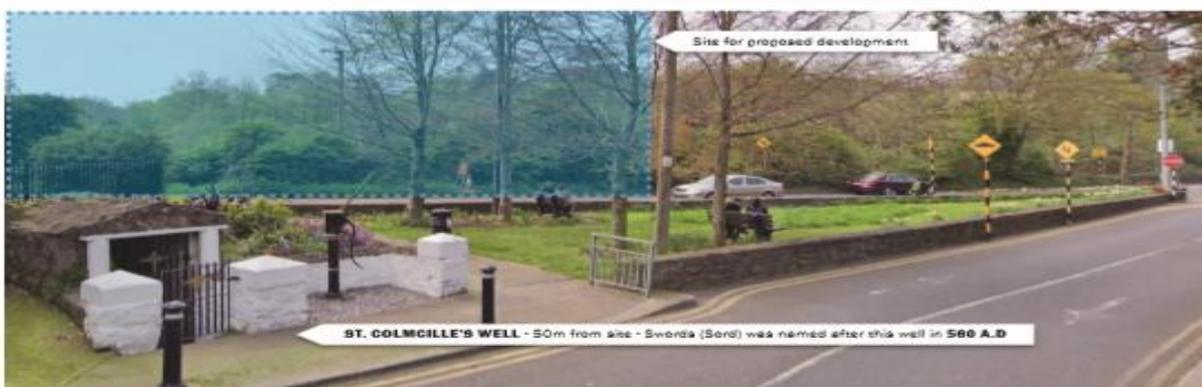
Firstly, one of the most significant features is the heritage sites in the immediate surroundings. Stark modern tower block looks absurd so close to the heritage site - round tower & well, after which Swords was named in 6th century. The [Consistency & Planning Report](#)(p.69) states:

- *View corridors from Main Street to the Park and to St. Columba's Church are to be fully considered and as per Objective SWORDS 4 Promote the development of lands within Swords town centre in accordance with the principles and guidance laid down in the Swords Master Plan (January 2009). Viewpoint assessments from and to the Church (Protected Views) will be required.*

It is funny how the statements and justification used for this development uses past plans from 2009 and current plans from 2019 so loosely or simply to suit their agenda on a given topic. It is clear these protected views will be hindered. The heritage sites will all have visible site lines to this SHD. This is not protecting their views in the best possible manner.

Secondly, a prominent feature of the Lord Mayors and surrounding areas is the old stonework, as seen below on photos of church street, such beautiful aesthetics are destroyed and ignored by this SHD proposal. It is a matter of fact in this instance this SHD is not in keeping with the style of the surroundings. See Chalk bar building completed in 2019 which fits in nicely. [See attachment](#)

The following photos show the aesthetic treatment of structures within **200m** of the proposed development.





THE CHALK BAR - OPPOSITE SITE - completed 2019, matches surrounding aesthetic



CHURCH ROAD - 100m FROM SITE



CHURCH ROAD - 150m FROM SITE



PARISH CENTRE - 150m FROM SITE



THE OLD VICARAGE - 200m FROM SITE

The above photos are collated to show clearly on a scale of 200m from the SHD site and its surrounding areas, just how apparent and in keeping the local infrastructure is with the beautiful stonework which support the ambiance of the area. It is argued in the [Architectural Design Statement](#) (p.9) that the pleasing view is kept with this SHD when stated

“...the Second vista (pleasing view) is one of historic core...round tower...the form and orientation of the buildings should be arranged to take best advantage of these views and orientation while knitting in with the urban grain of the town”.

It is scandalous to say that the form, orientation is in anyway fitting in with the environment while having the urban grain of the town. If you look at the chalk bar you will see a real example of a modern facility that is in keeping with its surroundings, this SHD does not do that in anyway. The stonework needs to be kept in any development as an integral feature for this site. However the SHD does note the “ 1 metre high stone work which continues along the front edge of the car park” [Architectural Design Statement](#) (p.6), so it is fair to say the stone work is acknowledged it just is not deemed to have any significant impact on the area according to this proposal. I think the photos above show quiet clearly that this could not be further from the truth. The stonework needs to be retained and incorporated into any ongoing developments in this vicinity.

Thirdly, to further elaborate on the views of the site in keeping with the surroundings. Seven stories are significantly too high and will ruin sight lines from the Ward Valley park and of the historic St. Columba's Church and Towers. As the 4,6 and 7 stories blocks will all be visible from any of these locations. The sight lines for St. Columbus Church and Towers are vital and need to be protected, these sight lines will be forever ruined if seven stories are permitted.

The SHD feels the slope allows for the views to be maintained along with the heights proposed, I think this is completely inaccurate as the site may slope but the heights are levelled off on Church road which will restrict views and take away from views of the ward valley park.

Regards small scale development on the forest road in keeping with the housing, the site is 4 meters from house 7a on the forest road not exactly ideal for residents with significant heights, daylight lost and shade the site will add to their houses. In essence the developments are too close to the boundaries on all sides (especially on Forest Road and Dublin Roadsides). Any developments need to be pushed more into the site to allow wider footpaths and space and for these developments not to be so claustrophobic to their surroundings. We need space around these proposed buildings, and we don't need them squashed right up against the town of Swords at the very edge of the boundaries. Existing footpaths as reiterate earlier around Swords are way too narrow and we need to take every opportunity possible to reverse this and make them wider. Not withstanding the need for road widening and cycle routes.

Fourthly, the site is described as High amenity in the main as reiterated throughout. I want to state clearly this is **not** a "major town centre" site on all sides. Dublin Road is town centre which is over emphasised in this proposal as it is only one factor of the

proposed site and densities among other things are justified based on the land being zoned as HA. Church Street is a heritage site, Bell's Lane is a rural style park entranceway. The proposal should make significant effort to respect each area it borders. At present it is clearly manipulating the views, surroundings and built environment in terms of their zoning protocol to justify a clear over development.

Finally, this site is a potential archaeological site, so close to the former monastery that there needs to be a controlled dig of the car park before any development can proceed. With all due consideration Heritage & Surrounding Aesthetic I feel the five distinct points highlighted should be given serious consideration and I expect significant alterations and an oral hearing on these plans going forward.

Steamrolling Local Objectives

To summarise and add to some of the points made above this development manipulates and steamrolls many of the local objectives set out by FCC. Which include but are not limited to:

1. The cycle track in the local development plan has been completely ignored it is stated in Statement of Consistency & Planning Report that

*“The proposed development will provide 408 no. bicycle parking spaces (336 no. resident spaces at basement level and 72 no. visitor spaces at ground floor level in the central courtyard) which exceeds the above requirements. In addition, the proposed development will provide a connection from Main Street to Ward River Valley Park which can provide sustainable access to residential areas to the west of Swords town centre. Walking will be a viable option for future residents of this proposed development due to the site’s proximity to services, public transport hubs and employment centres” (**Consistency & Planning Report p.47**).*

Essentially this is noting the site’s proximity to a major town park and acknowledges a large number of bicycle spots but does not in any way show or indicate any cycle route from the main town centre, this is because it is not viable within the current road infrastructure the town park does not have access zones to accommodate cycle route as an commuter option to exit Swords at present particularly not at the scale this development suggests. Furthermore as reiterate throughout there are substantial road remediation and upgrade works outlined in the swords masterplan and the Fingal south transportation plan 2019 that are integral to the development of the village but this plan seems to supersede. It is mentioned in the [Consistency & Planning Report](#)(p.69).

- *New transport strategy for Main Street Swords and indicative road route to link with Beaverstown Road noted. Set back required allowing for cycle route at the Ward River Valley Park and footpath to be provided along Church Road. Advised to contact Paul Keane in respect to the cycle network plan.*

I imagine this is another typo within the document as the “Beaverstown road” is [9km from the lord mayors](#) and the swords master plan has as noted earlier, clearly states a link from the Brackenstown road to provide cycle route to the ward valley and footpath. None the less if this site does intend on developing a path from swords to Beaverstown and cycle route id be on favour where it viable.

2. Cramming 67 tiny 1 bed apartments 51sq meters approx. and 101 2 beds 79 sq meters approx. into the available land goes against the Swords Master plan to provide high-quality housing with long-term viability for the Swords area.
3. As reiterated this development contradicts the longstanding objective to open the entrance to the Ward River Valley Park for the benefit of everyone in Swords. Instead, it creates a narrow access point, hidden behind an apartment complex.
4. There needs to be an assessment of the impact this development will have on local school places, which are already in dire straits. We are at crises point regarding school places amenable to residents this needs to be addressed in conjunction with any increase in development.
5. We need a 100% guarantee that the proposed creche be completed, and penalties should be included if this does not occur.
6. Public transport schemes such as bus connects, and metro link should be agreed and be in the development phase i.e. money drawn down and in construction in order for a site of this nature to go ahead in order to have the sustainable public transport infrastructure required.

Floodplain Land

As noted in the application for this SHD and reiterated in the [Statement and response to pre planning consultation](#): (p.3) there have been reported issues or known flooding on this site in the past. This is not by any means surprising the site borders the Jacko river, and the forest road both of which have well known local flood issues, during periods of increased rainfall. This site in question slopes a total of 180 meters from highest point to lowest.

Firstly, as noted the Jacko river does flood when backed up. This site acknowledges such in [Engineering drawing No.0007](#) it indicates that when and if the river over flows it would flow up to boundary of basement and under ground car park and flow back down the hill or associated slope back toward the river. It quite literally has flooding risk from multiple sides. However in the [Consistency & Planning Report](#)(p.64) it is stated that

“This assessment concluded that the site is at low risk of flooding from fluvial, pluvial, tidal and groundwater sources...In conclusion, it is considered that the proposed development will not have any significant impacts on the environment. All recommended mitigation measures and standard practices will be employed throughout the construction and operation phase of the development to ensure that the proposed development will not create any significant impacts on the quality of the surrounding environment”

The assumption or calculated pre-assumption of flood risk noted in the engineers drawings, assume that the water will flow and disperse in a trend that will only effect the green space given the building heights will act as a tipping point and create a run off for surface water. However, in the consistency and planning report quoted it is complete contravention such actually stating, *“the proposed development will not have any significant impacts on the environment”*. I am not satisfied that flood risk can be aptly determined with certainty given the unprecedented and changing levels and forms of flooding on the site in the past, the SHD has acknowledged flood risk on the site so a report that states this is not the case or not general drainage mitigation would suffice is blatantly unjust in my opinion. I further feel to protect the greenspace a drain off point should be created in the ward valley rather than allow it to become a runoff point as the river basin will not act as such during significant flooding. We will effectively create a marsh area during flood times that has not been present until this proposed structure was put forward, this would the justify the statement *“the proposed development will not create any significant impacts on the quality of the surrounding environment”*. This statement is not an accurate statement or justified unless further measures are taken regards flood risk.

Secondly, the ward river has flooded the forest road in the past when backed up and the road itself would not be uncommon to have its own flooding over the years, more to do with associated water mains rather than surface water. The image below reiterates the risk the ward river can play in terms of flood risk, the measures noted in [Engineering drawing No.0007](#) is not suitable to deal with extensive and unprecedented flooding like highlighted below:



FLOODING ON FOREST ROAD 2008 - ENTRANCE TO HIGHFIELD GREEN

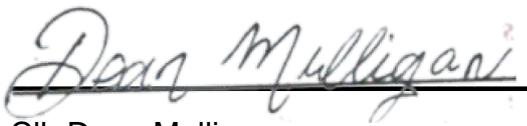


It is argued that the site has will have appropriate protections from common flood risk, but we have had unprecedented flooding and weather systems over the past number of years, this site is on flood plane land which is predisposed to flood given its sloping surrounding which change in levels quite significantly.

Finally, they note sustainable drainage systems but do not show how they would do such? The drawing from the engineer report are not supported with any written report, they however are alluded to in other documents. The site slopes as discussed 180 meters from highest point lowest, it is quite clear that the lowest point has significant flood risk and the drawings show that there is some measures taken. The levels do not flow in a straightforward downhill trajectory it is said “*They note changing in levels inter alia...*” [Statement and response to pre planning consultation:](#) (p.3).In the response document reference is given to several documents highlighted throughout. Given the site flows in what can only be described as uneven inter-alia, basic mitigation measures regard flood risk will not suffice. Essentially the viability of creating pockets of flood land is very real unless this is addressed appropriately.

In Conclusion:

Thus I recommend that the proposal be rejected on the grounds stated above, furthermore I must urge at minimum a significant reevaluation of the proposed site along with an oral hearing going forward on any proposal put forward.

A handwritten signature in cursive script that reads "Dean Mulligan". The signature is written in black ink and is positioned above a solid black horizontal line.

Cllr Dean Mulligan

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Swords, Co Dublin,

K67N766