

Observations and Concerns on Behalf of Councillor Dean Mulligan, Planning Ref: F24A/0612E:

I believe a significant disparity is present between the perceived serviceable site's ability to deal with capacity sustainably and what is presented in this application. I acknowledge that many aspects of national legislation have been justified by the applicant, including building standards, density requirements, and land zoning objectives. Additionally, Swords is recognised as a "key town" and a "metropolitan" suburb of Dublin, justifying the push for increased sustainable development in the area. However, these policies cannot be considered in isolation; the core strategy, rational, function and delivery of the same is set against the backdrop of public infrastructure being present "in some form" or at least planned and viable. With respect to Knocksedan; it is a satellite estate which borders Swords to the west surrounded by a regional road and high amenity parklands. It does not have ANY infrastructure to allow for SAFE walking, cycling or high-quality public transport links to the adjoining town of Swords or greater Dublin area. This observation will explore some areas that need to be considered for significant additional information and improvement in my opinion.

The planning proposal justifies its perceived adherence to the **National Planning Framework** by focusing on these three points which I would argue it fails to satisfy:

- *NPO 3a, b, c: Promote new housing within existing settlements.*
- *NPO 11: Support development that increases population and jobs in urban areas.*
- *NPO 72a, 72b, 73a: Prioritise development on serviced and serviceable lands.*

I believe it fails due to, **Reliance on Existing Infrastructure:**

The proposal relies on the infrastructure from Reg. Ref. F06A/0347, provided during the 2006/2007 development of the estate. While adequate at the time, this infrastructure does not meet the strategic requirements of current and future developments. Various deficiencies hinder the ability to comply with NPO 3a, b, c, which calls for building new homes within existing settlements. The site has significant constraints regarding access to public infrastructure and services necessary for housing development.

Knocksedan lacks pedestrian access to any area outside the estate's boundaries. Residents have campaigned extensively for a route to Swords or neighbouring estates, such as Swords Manor, Ridgewood, and Brookdale. A major concern is the reliance on driving due to the absence of public transport, except for a local shuttle and twice daily express bus. Residents have petitioned the NTA and Fingal County Council to address this issue.

Applying the 15-minute city guidelines from the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (2023) is unfair, as achieving these standards is unfeasible given the current site development. This issue also aligns with the aims of the Regional Spatial and Economic Strategy (RSES) 2019-2031, which identifies this area as a strategic development zone within the MetroLink Corridor of the Dublin Metropolitan area strategic plan. Swords is considered a key town in the settlement hierarchy, expected to support sustainable, compact growth and urban regeneration through infill and brownfield site development.

However, Knocksedan functions as a satellite estate with no immediate infrastructure or amenities. There are no creches (which were scheduled in previous phases) and no walkable access to pre-schools, primary or secondary schools, or higher education facilities. Public transport links are limited to an inadequate shuttle and express bus service.

Traffic Impact:

Access via Knocksedan Drive and connection to the R108 is insufficient. A comprehensive traffic impact study is essential to prevent congestion and ensure safety, especially considering additional developments like Ashe Wood, Usher Park, Belvedere, Knocksedan, Bolton Green, and surrounding areas.

The additional exit onto R108 from Belvedere Avenue does not adequately address these concerns. It only adds an additional exit to a road that is not fit for purpose or capacity without any plans for a footpath.

Further development needs careful consideration given the existing traffic impact. I believe not providing an up-to-date traffic impact assessment would be contrary to the Fingal Development plan and guidelines for Transport Strategy for the Greater Dublin Area 2022-2042. There are a number of current developments relying on such guidelines to justify traffic impact in developments which are currently serviced by walking infrastructure to nearest townlands unlike Knocksedan. I believe that the cumulative effect of nearby developments may overwhelm existing road capacities, which is not considered or acknowledged. Furthermore, there is no acknowledgement of the western distributor road, although the Fingal development plan has an indicative line outlined on the map which takes in the R108 and connects to Knocksedan.

Environmental Impact of Increased Traffic

These areas need to be addressed in the current plan and not previous EIA:

Air Quality and Noise Pollution:

The proposal or original EIA fails to implement measures to minimise air and noise pollution caused by increased traffic.

Sustainable Transport Solutions:

The proposal fails to acknowledge any internal sustainable transport solutions. The Fingal development plan strives to support developments that have progressive sustainable targets. For example, a design standard norm would be supporting low-emission vehicles by incorporating electric vehicle charging stations to reduce environmental impact. There is an absence of Mitigation Strategies. The proposal should include effective strategies such as road widening or new traffic signals to manage increased traffic flow; a traffic impact assessment would suffice. The proposed development needs to demonstrate how it has applied DMURS standards, examined the Lux reports accompanying landscaping reports, visual impact assessment, and day light analysis report, which is standard when building apartments fronting residential sites.

Another aspect of the proposal is acknowledgement of the: **Department of Housing, Local Government and Heritage - Section 28 Guidelines:** as such the developer notes that they will:

“..Focus on improving connectivity and infrastructure...” the developer proposes it will be achieved by

“...emphasises placemaking, the protection of the streetscape, and maintaining the area's character as per the Planning Authority's previous feedback. While preserving the area's character, the development should also enhance its character, permeability, accessibility, and the prospect of sustainable transport modes. The design approach aims to protect adjoining residential amenities and avoid undue impact on the local residential area”

but fails to do this. The playground promised in previous phases has also failed to come to fruition. Aforementioned sustainable transport modes are not present and not planned. No walking and cycling routes are viable nor are they safe to pursue via the main exit onto the R108.

Density Guidelines:

There appears to be a mismatch with density guidelines. The proposal of 59 houses and 18 apartments will exceed the current density in the area based on the original planning application in which the “infrastructure” is based off of. High-density developments in low-density zones can strain local infrastructure, including roads, public services, and utilities, overburdening community resources. The proposal adopts a piece-meal approach to development without adhering to the developer’s overall vision and phased plan, which is contrary to the Fingal Development Plan’s emphasis on comprehensive and phased development strategies to ensure economic viability

and adaptability. Whilst the original application exists this proposal would see a near 95% increase in units provided for under the original plan and EIA guidelines for the same, a difference of 195 units approx., on the allocated land compared to the 189 agreed in the first phase, the site is nearly 300 at present and an additional 77 are proposed.

Housing Type Compatibility:

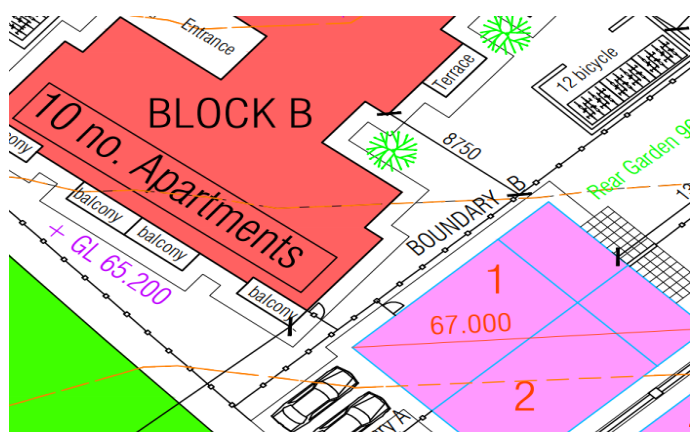
The mix of housing types must align with local housing policies and community needs. If the proposed mix does not match the demographic and social requirements of the area, it could lead to issues such as inadequate family housing or a lack of affordable options, which is a concern in this case. Ensuring the proposed use aligns with specific zoning objectives to maintain planned land use and community structure. The site needs a creche as mandated by the 2001 guidelines require

“at least one childcare facility is recommended to be provided for every 75 dwellings in new housing developments”. i.e. 20 child care spaces for every 75 units built.

This estate has none. Based on the legislation of total proposal 3.8 creches would be needed to services this site. Prior to this proposal being agreed which would bring it to 5 crèches as per guidelines. Not ONE is provided on site.

Specific Planning Policy Requirements (SPPR 1 and 2)

There are clear concerns regarding separation distances and open space provision, particularly the separation distances from Block B to the gable end of house type G Sustainable Development, a separation distance of 8.7 metres as opposed to 22 or 16 metres in some circumstances.



- **SPPR2 Lack of Green Infrastructure:** The proposal does not adequately incorporate green spaces or sustainable design elements, which are key components of the Fingal Development Plan.

Energy Efficiency: There is no mention of energy-efficient building practices or renewable energy sources in the proposed development, which conflicts with the sustainability goals of the plan. In my opinion the project is not adhering to **EU directive on environmental impact assessments 2011**.

I believe there are **Inadequate Environmental Assessments**: The proposal relies on outdated environmental impact assessments, insufficiently addressing the current conditions, particularly concerning drainage and ecosystems. Historical examples of failed water treatment in the area give rise to this concern: Examples of past issues in the area, like sewage overflow and water pressure problems. Highlighted in both 2007 (detailed report on sewage overflow), 2009 at start of development and 2024 - due to multiple pump station failures. Which caused significant impact to local ecosystems as it discharged into the ward river. I would argue an impact local flora and fauna (plants and animals) or water bodies, all **HAVE BEEN** impacted by the development to date on multiple occasions.

Other concerns, a screening assessment needs to look at:

Environmental and Ecosystem Impact: Minimising ecological footprint and integrating green infrastructure to protect natural habitats and biodiversity.

As such we need to look **Infrastructure and Services**: (Traffic and public transport was addressed earlier).

1. **Capacity Issues**: The additional strain on existing infrastructure, such as water supply and sewage systems, may require significant upgrades to support the increased load.
2. **Strain on Existing Infrastructure**: Verifying infrastructure capacity to support the development scale is essential to prevent service disruptions.
3. **Water Supply and Fire Safety Concerns**: Adequate water pressure and placement of fire hydrants are critical for ensuring safety during emergencies.

Flood Risk Management

1. **Incorporation of Flood Risk Assessments**: The proposal must integrate findings from a site-specific flood risk assessment to effectively mitigate potential flood risks.
2. **-Sustainable Urban Drainage Systems (SuDS)**: Having this in place is not enough as an EIA outline how this can be maintained and monitored are vital for long-term effectiveness and ecological benefits. In this regard **Surface Water Drainage** is a concern and **Lack of Attenuation Measures**: Existing site lacks adequate measures for managing surface water runoff, risking increased flood potential. Storage or overflow capacity to show capacity for managing rainfall events need periodic review and maintenance to ensure effectiveness and prevent untreated water discharge.
3. **Assurances Foul Drainage has Capacity of Public Network**: The existing sewage networks' capacity to handle additional load needs verification to avoid sewage overflow and environmental pollution.

All of these areas are integral to protect the high amenity ward river valley park which is being further developed and is cornerstone of this site, the concerns are raised due to a history of failures and risk associated to impact local flora and fauna.

In summary the additional strain on existing infrastructure, such as water supply and sewage systems, requires significant upgrades. Verifying infrastructure capacity is essential to prevent service disruptions. Adequate water pressure and fire hydrants are critical for safety. The proposal must integrate findings from a site-specific flood risk assessment and maintain sustainable urban drainage systems (SuDS).

Water supply:

Capacity Verification: The public network's capacity to handle additional effluent load should be examined to avoid future supply issues. The responsibility of Uisce Éireann is to only acknowledge “if the connection is viable” which it is, and “if they can connect site to mains water system” which they can. However, we have seen all areas of Ridgewood and Knocksedan severely impacted by negligence in this regard due to lack of pumping station due to water pressure “not supply”. We have seen these failures in Ridgewood and may soon see them elsewhere.

Historical and Cultural Preservation

Impact on Protected Structures: The proposal does not adequately respect the setting of Brackenstown House, a protected structure, and fails to preserve the historical and cultural integrity of the area.

The Fingal development plan constitutes public consultation as a pillar of its planning framework but it is not enshrined in legislation so it does not happen. It is clear there is insufficient engagement with the local community to address their concerns and incorporate feedback into the planning process contradicts the plan’s emphasis on robust public consultation.

Conclusion

The proposed development fails to align with key aspects of the Fingal Development Plan 2023-2029, the RSES in terms of infrastructure constraints and NPF and great Dublin transport strategy in terms of connectivity of population growth to core town centres without car reliance. Thus, highlighting significant deficiencies in sustainable development, zoning compliance, environmental protection, and infrastructure capacity. The absence of green infrastructure, outdated environmental assessments, and inadequate attention to historical preservation undermines the plan's objectives. Additionally, the development's piecemeal approach lacks the comprehensive planning necessary for phased and sustainable growth. It uses economic and business rationale to negate environmental impact concerns, national legislation was not created to bypass environmental best practice. Concerns over increased traffic, insufficient road infrastructure, and definite strain on public services further emphasise the need for a more robust and integrated planning strategy.

To ensure the proposed development contributes positively to the community, it is essential to address these deficits comprehensively. This includes revisiting the zoning and environmental impact assessments, enhancing public consultation, and incorporating sustainable design practices that align with the Fingal Development Plan. A stronger focus on infrastructure capacity (of which there is none at present), traffic management, and historical preservation will help mitigate risks and foster a development that is resilient, sustainable, and supported by the local community. Without these critical adjustments, such as linking Knocksedan to neighbouring areas with walking and cycling infrastructure, the development risks not only non-compliance with regulatory standards but also has the inability to facilitate the long-term sustainability and well-being of the area.

Please note that for avoidance of doubt, I wish to see Knocksedan develop. However, there is a multitude of aforementioned deficits that need to be realistically examined and key concerns addressed. I cannot stand over housing people in environmentally unsustainable areas that are considered urban towns but have NO immediate infrastructure to connect them to the “town” of which they are supposed to be a suburban centre.

Your Sincerely



Cllr. Dean Mulligan