



THORNTON O'CONNOR
TOWN PLANNING

Statement of Response to LRD Opinion

**Prepared in Respect of a Planning
Application for a Large-Scale Residential
Development (LRD) at a Site of 2.22 Ha at
Greenfields, Swords, Co. Dublin**

**On Behalf of Jackie Greene Construction
Limited**

July 2026

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INTRODUCTION

This *Statement of Response to LRD Opinion* (Statement of Response) has been prepared by Thornton O'Connor Town Planning¹ (TOC) on behalf of Jackie Greene Construction Limited² (the Applicant) in respect of a Planning Application for a Large-Scale Residential Development (LRD) submitted to Fingal County Council (FCC). In summary, the LRD comprises 289 No. apartment units, a commercial/retail unit and a crèche, proposed in 5 No. blocks at a site of approximately 2.22 Ha at Greenfields, Swords, Co. Dublin.

Full details of the site location and a description of the development are included in TOC's submitted *Planning Report and Statement of Consistency*.

This Statement of Response has been drafted based on insights provided by the plans and particulars prepared by the wider Design Team: MCORM Architects³ (MCORM), Roger Mullarkey & Associates⁴, NRB Consulting Engineers⁵ (NRB), MandE Consulting Engineers⁶ (MandE), Cunnane Stratton Reynolds Land Planning & Design⁷ (CSR), CMK Hort + Arb Limited⁸ (CMK), DNV⁹, 3D Design Bureau¹⁰ (3DDB), Model Works¹¹, Integrated Environmental Solutions Consulting¹² (IES), Wave Dynamics Acoustic Consultants¹³ (Wave), Awn Consulting¹⁴ (AWN), Independent Site Management¹⁵ (ISM), MacroWorks¹⁶ and John Cronin & Associates¹⁷. Therefore, this report **must** be read in tandem with these materials.

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1. PROCEDURAL AND PRINCIPAL MATTERS

LRD Item	Response
The Planning Authority is not satisfied that the development would provide an adequate standard of residential amenity for future occupants of the scheme having regard to the layout, quality and quantity of public open space, which in its present form, would not comply with Development Plan standards. The Planning Authority is not satisfied that the open space proposed represents usable open space. Public open space must be usable in order for it to be included in the calculation of public open space provision. The submitted landscape plan does not indicate the site contours or services including the existing wayleave. It is therefore not clear what impact these features will have and what access for maintenance will be required. There are significant concerns regarding the public open space proposed along the eastern site boundary which is considered to be of low amenity and recreational value. The submitted Landscape Report has not clearly demonstrated that trees shown for retention can be successfully and realistically retained. The location of the pump station in close proximity of the proposed play area is not appropriate nor acceptable taking into consideration the requirements for vehicular access and maintenance works. The layout of the development requires revision to address these issues. The design and layout of the proposed scheme is not acceptable as it would fail to provide a satisfactory standard of residential amenity in terms of noise and urban design. In this regard, there are concerns regarding the eastern side of the development in its current form which is considered to be an unpleasant location due to noise. The proposed open space on the upper level of the undercroft parking fails the acoustic standards in the report provided. Further consideration should be given to the site layout in terms of the re-positioning of Block C and the relationship between the public open space and the M1 motorway. Further consideration should also be given to the activation of the 'central spine' regarding the location of bike stores, landscaping and improvement to passive surveillance and passive surveillance around the undercroft parking.	These <u>2 No. items</u> are combined herein due to their fundamental interconnectedness. Following the LRD Meeting and receipt of the <i>LRD Opinion</i>, the Applicant and Design Team enacted a variety of changes and positive design interventions. These, we contend, combine to address the concerns raised by the Council. Notable design considerations include: • Omission of the public open space, the undercroft car parking and the podium-level communal amenity space at the eastern side of the development (i.e. east of Block C), and the introduction of at-grade car parking in lieu. • Screened communal amenity space atop Block D and E. • Retained single-storey form between Blocks D and E to create a sense of enclosure and to provide a buffer against the incursion of noise in the southern/central public open space. • Retention of existing trees and vegetation in the south-western corner of the site delivering an immediate sense of established landscaping. • Utilisation of wintergarden private amenity space for units 'impacted' by noise emanating from the existing site environs. Noting the multiple concerns raised in respect of noise impacts on amenity, a fully and carefully prepared <i>Acoustic Design Statement</i> has been prepared by Wave Dynamics. The Council is respectfully directed to same for greater insights.

LRD Item	Response
	We also direct the Council to Section 6.8.1.3 of the enclosed <i>Planning Report and Statement of Consistency</i> , which discusses noise impacts and external amenity in a holistic, integrated manner.

2. PLANNING

LRD Item	Response
A detailed phasing plan to be submitted to address the delivery of residential units, childcare provision and open space.	It is proposed to construct the proposed development in a single phase, with all aspects delivered in one tranche of activity. Should the Council require a more detailed indication of the construction stage methodology and staging, this can be furnished prior to construction.
A statement of consistency to be submitted to demonstrate that the proposal accords with National, Regional and Local Policy.	Please refer to Thornton O'Connor Town Planning's enclosed <i>Planning Report and Statement of Consistency</i> .
The Design Statement or other documents submitted with the application should comply with Objective DMSO261 , which requires new residential developments to provide a Climate Action Energy Statements as part of the overall Design Statement to demonstrate how low carbon energy and heating solutions, have been considered as part of the overall design and planning of the proposed development.	Please refer to MandE's enclosed <i>Climate Action Energy Statement</i> .
Application to ensure the proposal would comply with all provisions relating to Objective DMSO78 of the Fingal Development Plan 2023-2029.	Please refer to Thornton O'Connor Town Planning's enclosed <i>Social Infrastructure Audit</i> .
A Green Infrastructure Plan is required as per Objective DMSO124.	Please refer to the content of CSR's <i>Landscape Design Statement</i> .

3. RESIDENTIAL AMENITY

LRD Item	Response
A Housing Quality Assessment to demonstrate that proposed residential units comply with all relevant internal/external standards.	Please see pages 48–52 of MCORM's <i>Architectural and Urban Design Statement</i> .
A daylight and sunlight assessment .	Please refer to 3DDB's enclosed <i>Daylight and Sunlight Assessment Report</i> .
Drawings which overlay the predicted noise contour maps on the architectural site plan and open space drawings to show the predicted	Please refer to Wave Dynamics' enclosed <i>Acoustic Design Statement</i> .

LRD Item	Response
noise levels for day, evening and night-time periods at 1.5m, 4m, 6m, 10m, 15m, 20m, 25m, 30m and 35m heights respectively.	
A 3D markup of predicted noise contours on all building facades in the proposed development for day, evening and night-time periods.	Please refer to Wave Dynamics' enclosed <i>Acoustic Design Statement</i> .
Proposals for the provision of acoustic screens to mitigate noise from the east.	Please refer to Wave Dynamics' enclosed <i>Acoustic Design Statement</i> and the architectural materials prepared by MCORM and landscape architectural materials prepared by CSR. Acoustic screening is proposed at the rooftop communal amenity spaces and wintergardens are proposed for the private amenity space of a series of apartments. Other interventions to address noise-related concerns include connecting blocks D and E along the southern extent with the single-storey commercial structure to enclose the open space, removal of the communal amenity space and public open space from the east of the site.

4. DESIGN AND LAYOUT

LRD Item	Response
Layout of pedestrian walkways between Blocks A, B and C should be revised and improved in height.	Please refer to MCORM's suite of architectural drawings, in particular the section drawings of Blocks A–C. Double-height walkways are provided through these blocks to deliver open and inviting permeability that ties in with adjacent communal amenity spaces.
Full details of proposed external finishes to be provided.	Please refer to MCORM's architectural drawings (elevations specifically) and page 42 of their <i>Architectural and Urban Design Statement</i> .
Refer to Architects Report in Appendix 2 for further comments/issues raised.	These matters are addressed by way of the design interventions enacted and rationale/justifications principally contained within MCORM's <i>Architectural and Urban Design Statement</i> and Thornton O'Connor Town Planning's enclosed <i>Planning Report and Statement of Consistency</i> .

5. IMPACTS ON AMENITIES

LRD Item	Response
A Construction Environmental Management Plan.	Please refer to AWN's enclosed <i>Construction Environmental Management Plan</i> .

6. PART V FULFILMENT

LRD Item	Response
Full proposals in respect of compliance with Part V .	Per Section 96 of the <i>Planning and Development Act 2000</i> (as amended), planning applications to which Part V applies must contain 3 No. specific pieces of information. These are summarised in all 3 No. of the <i>Circular PL 10/2015 and Housing Circular 36/2015</i> (November 2015), <i>Part V of the Planning and Development Act 2000 Guidelines issued by the Minister for Housing, Planning, Community and Local Government under section 28 of the Planning and Development Act 2000</i> (January 2017) and <i>Part V Resource Pack 4th Edition Concluding Part V Agreements</i> (May 2025). The Part V proposal is summarised by the Guidelines as not needing "to be overly detailed but must contain: • <i>how the applicant intends to discharge his/her Part V obligation as regards a selection of a preferred option from the options available under the Act;</i> • <i>details in relation to the units or land to be provided; and</i> • <i>indicative costs."</i> Accordingly, we note the following: • The Applicant intends to discharge its Part V obligation through the on-site transfer of completed units to FCC, pursuant to Section 96(3) of the <i>Planning and Development Act 2000</i> (as amended). A total of 58 No. units (12 No. 1-bedroom, 31 No. 2-bedroom and 15

LRD Item	Response
	No. 3-bedroom), located in Block A, are proposed for transfer — equivalent to 20% of the 289 No. units proposed, in accordance with the requirements of Part V. - The specific units are indicated in Section 4.4 of MCORM's <i>Architectural and Urban Design Statement</i> and the associated unit type and floor plan drawings. - Costs have been prepared and are enclosed as a standalone schedule.

7. TRANSPORTATION AND ACCESS

LRD Item	Response
Drop-off for the creche should be addressed.	For the crèche, 2 No. car parking spaces are proposed. It is envisaged that the facility's enrolments will mostly originate from within the proposed development and the environs of the site, thereby likely via active modes. Should the Council deem it appropriate to dedicate spaces for drop-offs, this could be actioned by way of compliance condition.
The 'redline boundary' should cover all works, including the reinstatement of footpath where the existing vehicular entrance is proposed to be removed.	This is proposed. All development is / works are proposed within the red line boundary.
The existing footpath along the northern and western boundary of the site should be upgraded to a 2m wide footpath.	This is proposed, as requested. Please refer to MCORM's architectural drawings, but also those prepared by CSR.
Clarity to be provided regarding the retention of the existing 'rock boulders' along the existing access road.	These are to be removed, with the preference being to reuse them as part of the development's landscaping.
Details to be provided regarding the 'taking-in-charge' proposals; and take cognisance of the Council's Taking in Charge Policy and Specifications.	Please refer to MCORM's enclosed <i>Site Layout Plan Taking in Charge</i> .
Consideration should be given to a dedicated loading space, for deliveries etc.	Per NRB's <i>Traffic & Transport Assessment Report</i>: "For the vast majority of servicing, the type of vehicle servicing a residential apartment scheme with commercial elements will be very much smaller service vehicles such as taxis, small vans, Transit Vans or Courier Bikes. These

LRD Item	Response
	<i>can be clearly accommodated within the site footprint with the provision of controlled surface parking, which can include a periodic short term set down or timed visitor space available to smaller service vehicles such as Amazon Vans.</i> <i>It is anticipated that the smaller commercial unit will have a similar small scale requirement for servicing, by way of transit van type vehicles, and these can easily be accommodated for short term deliveries by way of the turning head located immediately north of the proposed unit."</i>
EV charging should be addressed as per Section 14.17.10 of the Fingal Development Plan 2023-2029.	As required, at least 20% of the proposed spaces are dedicated to EV charging, with the balance ducted to allow for retrofitting should adequate demand arise.
A Stage 1 Road Safety Audit should be carried out and the report submitted.	Please refer to Appendix K of NRB's <i>Traffic & Transport Assessment Report</i> .
A statement of consistency with DMURS .	Please refer to Appendix H of NRB's <i>Traffic & Transport Assessment Report</i> .
The roads drawings should be further developed to include signage, line marking, kerb levels, dished kerb/tactile paving, public lighting, and surface water drainage.	Please refer to the drawings prepared by NRB included in Appendix A to their <i>Traffic & Transport Assessment Report</i> .
A statement of consistency with the traffic signs manual should be provided.	Please refer to the drawings prepared by NRB included in Appendix A to their <i>Traffic & Transport Assessment Report</i> , specifically the <i>Proposed Site Layout, Road Markings and Signage Details</i> drawing. Note that the design and drawings were also subject to review as part of the road safety audit.
A 'swept path analysis' should be provided for a bin collection vehicle, a fire tender, and for the maintenance vehicle that would access the 'pumping station'.	Please refer to the drawings prepared by NRB included in Appendix A to their <i>Traffic & Transport Assessment Report</i> .
The detail of the northern vehicular entrance should be further developed, with detailed cross sections provided.	Please refer to the drawings prepared by NRB included in Appendix A to their <i>Traffic & Transport Assessment Report</i> . Note that the design and drawings were also subject to review as part of the road safety audit.
Consideration should be given to the provision of a cycling link from the development entrance to the proposed new active travel project on the Seatown Road , the project is titled ' <i>Seatown Road to Estuary Road, Swords. Road Safety, Cycling and Walking Improvements</i> ', and is planned to commence construction in Q1 2026.	A pedestrian and cycle connection is proposed at the south/south-eastern side of the site, tying in with the existing network and allowing for easy link into the forthcoming infrastructure.

8. ENVIRONMENTAL IMPACT ASSESSMENT

LRD Item	Response
The applicant to submit all necessary reports for the purposes of Environmental Impact Assessment . Reports to be based on up-to-date information and survey data.	Please refer to DNV's enclosed <i>EIA Screening Report</i> .

9. APPROPRIATE ASSESSMENT

LRD Item	Response
Noted that Appropriate Assessment and Natura Impact Statement has been prepared. Reports to be based on up-to-date information and survey data.	Please refer to DNV's enclosed <i>Appropriate Assessment Screening Report</i> and <i>Natura Impact Statement</i> .

10. UNIVERSAL/AGE FRIENDLY HOUSING

LRD Item	Response
Details to demonstrate compliance with Objective SPQHO22 of the Fingal Development Plan 2023-2029 which requires that 30% of social housing (Part V) should be fully accessible and designed with a universal design approach.	These <u>2 No. requirements have been combined</u> for response. The Part V requirement is to be met within the 58-unit Block A building. Of these, 57 No. are designed in accordance with universal design (UD) principles such that they are UD-compliant and age-friendly, thereby exceeding the requirements of the objectives calculated as follows: Objective SPQHO22: $289 \times 20\% \times 30\% = 17.3$ Objective DMSO37: $289 \times 10\% = 28.9$ Combined total: 46.2
Details to demonstrate compliance with Objective DMSO37 of the Development Plan which requires that new residential developments of more than 100 units should provide 10% of the units as age-friendly accommodation .	

11. WASTE MANAGEMENT

LRD Item	Response
An Operational Waste Management Plan to address: - Waste generation from the development using “BS5906:2005 Waste Management in buildings – Code of Practice”. Household waste to be calculated separate from commercial waste and kept separate for collection. - Volume of waste generated split into various waste streams: mixed dry recyclables, glass, food waste, mixed residual waste. Detailed drawings of Waste Storage Areas for apartments showing the layout of the bins – demonstrating WSA size is suitable for quantity of waste generated. Waste Storage Area design to follow considerations provided in sections 4.8 and 4.9 of “Sustainable Urban Housing: Design Standards for New Apartment”. - Design of individual apartments to cater for waste segregation, with adequate storage provided per section 4.8 of “Sustainable Urban Housing: Design Standards for New Apartment”. Sink Macerators are prohibited. - Location of waste storage areas to comply with Objectives DMSO237 and DMSO238 of the Fingal Development Plan.	Please refer to AWN’s enclosed <i>Operational Waste Management Plan</i>, which addresses the items raised. Also refer to MCORM’s ground floor plans for details of the various waste storage areas.

12. PUBLIC LIGHTING

LRD Item	Response
Proposals in respect of public lighting which accord with the information set out in Appendix 3.	Please refer to the enclosed <i>Site Lighting Report</i> prepared by MandE.