

Observation Mountgorry LRD: LRD0025/S3E

On Behalf of: Councillor Dean Mulligan

30/10/2024

Please see my observation highlighting my opinion on the planning flaws in the Mountgorry development proposal, based on my review of relevant planning documents, including the **Fingal Development Plan 2023-2029**, the **Eastern & Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES)**, and other national guidelines such as **Sustainable Residential Development in Urban Areas** and **Urban Development and Building Heights Guidelines**, Ministerial section 28 guidelines and others.

The areas I feel need addressing are:

1. Lack of Green and Open Spaces

The Mountgorry proposal fails to provide sufficient green and open spaces that meet the multifunctional criteria set out by Fingal County Council.

One of the most significant shortcomings of the Mountgorry LRD proposal is the insufficient provision of green and open spaces. In line with both the **Fingal Development Plan 2023-2029** and the **Sustainable Residential Development in Urban Areas Guidelines**, high-quality green spaces are not only beneficial for community well-being but are also crucial for managing stormwater and enhancing biodiversity.

The development mentions open spaces but lacks sufficient detail on how they will be implemented in a manner that meets the multi-functional criteria outlined in Chapter 9 of the Fingal Development Plan, which emphasizes creating open spaces that cater to both recreation and ecological functions.

Failure to Integrate SuDS (Sustainable Urban Drainage Systems): SuDS are essential to mitigating flood risks and promoting urban biodiversity, as per **Section 9.4.1 of the Fingal Development Plan**. The Mountgorry proposal does not sufficiently integrate SuDS, which are meant to be a critical part of green infrastructure.

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- **Insufficient Functional Green Spaces:** Public spaces in urban developments must be designed as both accessible and functional areas for recreation, in line with **Section 5.3.3 of the Sustainable Residential Development Guidelines**: The proposal includes vague details on open spaces without clear adherence to these standards it suggests they may not serve meaningful recreational purposes.

The development does not fully incorporate SuDS, crucial for managing surface water and mitigating flood risks, leading to potential issues with environmental sustainability and stormwater management.

Recommendation:

Detailed planning for functional green spaces, with a focus on SuDS integration, is essential to align with local objectives for biodiversity, stormwater management, and ensuring that these areas are multi-use public amenities.

2. Height and Massing Problems

The proposal's 5-storey buildings do not integrate well with the surrounding lower-rise residential areas, creating abrupt transitions in height. Although it tries to justify it using the RSES, in terms of transport corridor which is refuted at present.

Disproportionate Massing: The massing of the development does not seem well-considered within the existing urban fabric, which will result in overshadowing and a loss of neighborhood character. The **Urban Development and Building Heights Guidelines** (2018) emphasise that building heights should be carefully considered to balance both urban density and local aesthetics. This development aligns the justification to category 2, which is 4-6 stories but fails to find an appropriate balance.

The proposal's 5-storey buildings do not integrate well with the surrounding lower-rise residential areas, creating abrupt transitions in height.

- **Fingal Development Plan (Chapter 14: Development Management Standards, Section 14.4: Building Height and Massing)** requires smooth transitions between developments of varying heights to maintain visual harmony. The chapter provides clear guidance that height transitions should be gradual and context-sensitive, maintain visual harmony and avoid an oppressive built form which this proposal fails to achieve. The Mountgorry proposal fails to offer sufficient gradation in height, which could lead to overshadowing and aesthetic disruption.
- **Urban Development and Building Heights Guidelines** support higher buildings but emphasize that such developments should respect the local context and ensure proper integration into the urban fabric.

The 5-storey buildings are not appropriately stepped down near the edges of the development, creating a stark contrast with the surrounding low-rise homes.

Recommendation:

The building heights should be revised to provide smoother transitions between the new development and existing neighbourhoods, with height reductions along site boundaries to mitigate the visual impact. Particularly given the site in question is elevated above existing low-rise residential developments.

3. Parking and Transportation Deficiencies

The proposal should increase parking provisions to reflect suburban standards while also working to improve linkages to nearby public transport hubs. This would alleviate concerns about traffic congestion and limited parking.

The Mountgorry proposal severely underestimates parking demand. With just 24 parking spaces for 123 units, the development does not align with parking standards appropriate for a suburban location with limited public transport infrastructure. **Chapter 6 of the Fingal Development Plan** provides specific guidelines for suburban parking requirements, which the proposal does not meet.

- **Fingal Development Plan (Chapter 6: Connectivity and Movement, Section 6.8: Parking Standards)** outlines parking requirements for suburban areas, where car usage is typically high due to limited access to public transport. The proposed ratio of parking spaces to residential units is insufficient, potentially leading to traffic congestion and parking issues in surrounding areas.
- **Public Transport Accessibility:** While the development encourages walking and cycling, it does not sufficiently account for the existing reliance on cars in suburban areas. Public transport infrastructure in the vicinity is not yet developed to a level that would justify the significant reduction in parking spaces.
- The bus stop that adjoin to the site has an infrequent privately operated bus the 102, which while useful is infrequent and not nearly a justification for this standard of carparking, the absence of speed ramps or traffic calming measuring on adjoining regional roads, coupled with narrow, or no footpaths, when they are present they are predominantly not level nor wide enough to facilitate a buggy or a wheelchair not to mention 100s of residents at peak times.

Thus the significant shortfall in parking spaces will exacerbate traffic and parking issues in nearby areas, increasing the burden on local infrastructure. Particularly when neighbouring residential estates are used for staff in Pavilions and Swords moreover.

Recommendation:

The proposal should needs to increase the number of parking spaces and offer alternative transport solutions, such as enhanced public transport linkages, car-share schemes, and safe cycling infrastructure.

5. Lack of Community Infrastructure

One glaring omission in the Mountgorry proposal is the lack of sufficient community infrastructure, such as childcare facilities and recreational areas. Large residential developments, as stated in **Chapter 4 of the Fingal Development Plan**, must integrate such amenities to cater to the needs of families and ensure social sustainability.

- **Omission of Childcare Facilities:** **Section 4.3.4 of the Fingal Development Plan under the guidelines for childcare facilities for planning authorities 2001** mandates that residential developments with more than 75 units must provide childcare facilities. The Mountgorry proposal fails to include any provision for such facilities, despite the significant number of proposed housing units. Thus the Mountgorry proposal lacks such provisions, which will place additional strain on existing local services.

- **Lack of Detailed Plans for Community Spaces:** The proposal mentions public spaces but does not clearly define how these areas will serve community needs or encourage social interaction.

The absence of childcare facilities and other essential amenities undermines the social sustainability of the development and fails to support the needs of families moving into the area.

Recommendation:

To address these shortcomings, the Mountgorry proposal should include a detailed plan for community infrastructure, particularly childcare facilities. Providing well-thought-out communal spaces will enhance the social integration of future residents.

6. Sustainability and Climate Action Shortcomings

The Mountgorry proposal does not demonstrate a comprehensive commitment to sustainability, which is a key priority for both local and national planning frameworks and the RSES. **Chapter 5 of the Fingal Development Plan** focuses on integrating climate action into all new developments. While the proposal mentions green roofs and PV panels, it lacks a broader strategy for sustainability. The proposal's sustainability measures are vague and do not align with the robust climate action requirements set out in local and national planning frameworks.

Absence of a Holistic Sustainability Strategy: While small-scale environmental measures are mentioned, the proposal lacks a coherent approach to reducing its environmental footprint. **Section 5.2 of the Fingal Development Plan** outlines clear guidelines for energy efficiency, low-carbon building materials, and water management, all of which are underrepresented in the proposal. It stresses the need for developments to adopt comprehensive strategies for energy efficiency, low-carbon technologies, and water management systems such as SuDS.

Failure to Fully Integrate SuDS: In addition to the lack of green spaces, the proposal does not adequately incorporate **Sustainable Urban Drainage Systems (SuDS)**, which are critical to flood risk management and environmental sustainability.

The inclusion of minor green features like photovoltaic (PV) panels and green roofs is insufficient to meet the broader sustainability goals. The proposal lacks a comprehensive approach to addressing its carbon footprint, water management, and long-term climate resilience.

Recommendation:

The developers should integrate a more thorough sustainability strategy, including advanced energy-efficient technologies, renewable energy sources, and comprehensive water management systems to support long-term climate resilience focusing on reducing energy consumption, improving water management through SuDS, and ensuring long-term climate resilience.

Conclusion

The Mountgorry LRD proposal in my opinion contains several planning flaws that must be addressed to align with local, regional, and national planning frameworks(**Fingal Development Plan**, **EMRA RSES**, and others)

- Lack of sufficient green spaces and inadequate integration of SuDS,
- Missed opportunities for compact growth and higher density,
- Height and massing issues with poorly integrated building transitions,
- Parking shortages and transportation deficiencies in a suburban context,
- Omission of key community infrastructure, particularly childcare facilities,
- Insufficient sustainability measures to meet climate action goals.

For the development to proceed in a manner that benefits both the local community and the environment, these issues should be carefully reconsidered, and the proposal revised accordingly. Addressing these flaws will help ensure that the Mountgorry development is both functional and sustainable for future residents. It would show how the proposal can better serve the community and contribute to sustainable, high-quality urban growth.

Your Sincerely



Cllr. Dean Mulligan