



An
Bord
Pleanála

Inspector's Report ABP-303403-19

Development

To a) erect 60 no. dwelling houses consisting of 24 no. 3-bedroom dwellings (house type A & A1), 12 no. 2-bedroom dwellings (house type B), 12 no. 2-bed ground floor dwellings (house type C) and 12 no. three bed duplex unit dwellings (house type D), b) provision of vehicular and pedestrian access to the existing public roadway on the north-eastern boundary, c) the provision of a green open space for use as a public amenity, and d) ancillary site works and connection to existing services.

Location

Ramstown Lower, Gorey, Co. Wexford.

Planning Authority

Wexford County Council

Planning Authority Reg. Ref.

20181507

Applicant(s)

Brendan Doyle of Arcona Developments Limited

Type of Application

Permission

Planning Authority Decision

Grant subject to conditions

Type of Appeal

Third Party v. Decision

Appellant(s)

Derek and Tina O’Sullivan
Oakhill Residents

Observer(s)

None.

Date of Site Inspection

18th April, 2019

Inspector

Robert Speer

1.0 Site Location and Description

- 1.1. The proposed development site is located in the townland of Ramstown Lower on the south-western fringe of Gorey, Co. Wexford, approximately 500m southwest of Gorey Shopping Centre and 400m northeast of Gorey Business Park, where it occupies an elevated position along a local ridge line overlooking the lands to the north and northwest. The surrounding area is characterised by the conventional suburban housing developments of Oakhill, Oakwood & The Paddocks to the east on the opposite side of Ramstown Road whilst a number of individual one-off dwelling houses, intermittent commercial premises and the business park provide for the gradual transition on travelling southwest towards to the rural hinterland.
- 1.2. The site itself has a stated site area of 2.4 hectares, is irregularly shaped and forms part of a larger undeveloped landbank situated between the R772 Regional Road to the northwest and Ramstown Road to the east / southeast. It presently comprises an open agricultural field bounded by mature hedgerows with a steep drop in topography apparent on travelling north-westwards which is defined by a dense tree belt. It adjoins agricultural fields / scrubland to the north / northwest, the Ramstown Road to the east, and an ESB substation (with some of the overhead lines traversing the site) and a commercial yard / compound to the southwest.

2.0 Proposed Development

- 2.1. The proposed development consists of the construction of 60 No. residential units as follows:
- 24 No. two-storey, three-bedroom dwelling houses (House Types 'A' & 'A1')
 - 12 No. two-storey, two-bedroom dwelling houses (House Type 'B')
 - 12 No. single-storey, ground floor, two-bedroom dwelling units (House Type 'C')
 - 12 No. two-storey, duplex, three-bedroom dwelling units (House Type 'D')
- 2.2. The overall design and layout of the scheme is based around a looped service roadway that will extend from a new entrance arrangement onto the Ramstown Road to the east. The individual house designs are generally of a conventional nature with

front and rear garden areas and dedicated off-street car parking, although the proposal also includes for a combination of two / three-storey construction alongside the main road in an effort to provide for a defined streetscape with some parallel parking bays located to the front of same and grouped communal car parking to the rear. External finishes will include blue / black roof slates, / uPVC windows, a plaster render, and the feature use of brickwork. Water and sewerage services are available via connection to the public mains.

3.0 Planning Authority Decision

3.1. Decision

- 3.1.1. On 18th December, 2018 the Planning Authority issued a notification of a decision to grant permission for the proposed development subject to 19 No. conditions. These conditions are generally of a standardised format and relate to issues including external finishes, landscaping, boundary treatment, construction management, site services, infrastructural works, and development contributions, however, the following conditions are of note:

Condition No. 2 – Requires the omission of Unit Nos. 47-50 on the basis that these dwellings were to be constructed underneath electricity lines extending from the substation to the south of the site.

Condition No. 3 – Requires details for the provision of a surface water attenuation tank, in lieu of the overground pond, in accordance with SuDS guidance, to be submitted for the written agreement of the Planning Authority prior to the commencement of development.

Condition No. 18 – Refers to archaeological pre-development test trenching and monitoring requirements.

3.2. Planning Authority Reports

3.2.1. Planning Reports:

Details the site location and the applicable policy considerations before stating that the principle of the proposed development is acceptable on the basis that the

housing element will be confined to that part of the site zoned for 'residential' development. It is further states that the proposal provides for an adequate mix of housing units and that whilst the density of the scheme (25 No. units / hectare) is at the lower end of that envisaged in the Development Plan, it is considered to be acceptable at this location. The report subsequently assesses the overall design and layout of the scheme before recommending a grant of permission, subject to conditions.

3.2.2. Other Technical Reports:

Chief Fire Officer: Advises of fire safety requirements.

Housing: States that there is an 'agreement in principle' in place.

Environment: Recommends that the applicant be required to submit a construction environmental management plan and the specifications of the proposed oil interceptor by way of a request for further information.

3.3. **Prescribed Bodies**

None.

3.4. **Third Party Observations**

3.4.1. A total of 3 No. submissions were received from interested third parties and the principle grounds of objection / areas of concern contained therein can be summarised as follows:

- A 10ft. high wall should be erected along the full extent of the south-western site boundary in the interests of visual and residential amenity.
- The proposed dwelling houses should be positioned to as to avoid any overlooking of the neighbouring property to the southwest.
- The increased traffic volumes and congestion consequent on the proposed development would be detrimental to public safety.
- Concerns as regards the adequacy of the sightlines from the proposed access arrangement given its location along a bend in the road.
- The provision of parallel parking along Ramstown Road will result in a serious traffic hazard.

- The communal parking arrangements proposed to the rear of the roadside housing is impractical and will likely give rise to undesirable and haphazard parking practices along the main carriageway.
- When the parallel parking spaces alongside the main roadway are unavailable, the likelihood is that vehicles will perform dangerous turning manoeuvres within the entrance to the Oakhill / Oakwood estate thereby giving rise to a traffic hazard and the obstruction of road users.
- Residents of the proposed development will be tempted to park along the access road to the Oakhill / Oakwood estate thereby contributing to traffic congestion and posing a hazard to users of the nearby 'Little Oaks Academy' childcare facility.
- Inadequate provision for pedestrian safety, including the failure to provide for a dedicated crossing point over Ramstown Road.
- The roadside housing should be served via a single access point from the roadway.
- The proposed development represents an opportunity to widen and realign the public road.

4.0 Planning History

4.1. On Site:

None.

5.0 Policy and Context

5.1. National and Regional Policy:

- 5.1.1. The '*Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities, 2009*' generally encourage more sustainable urban development through the avoidance of excessive suburbanisation and the promotion of higher densities in appropriate locations. In general, appropriate locations for such increased densities include city and town centres, 'brownfield' sites (within city or town centres), sites

within public transport corridors (with particular reference to those identified in the Transport 21 programme), inner suburban / infill sites, institutional lands and outer suburban / 'greenfield' sites. The proposed development site is located on lands that can be categorised as 'greenfield' and the Guidelines define such areas as open lands on the periphery of cities or larger towns whose development will require the provision of new infrastructure, roads, sewers, and ancillary social and commercial facilities such as schools, shops, employment and community facilities. Studies have indicated that whilst the land take of the ancillary facilities remains relatively constant, the greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally. Development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares.

- 5.1.2. The *'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, 2018'* (which update the *'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, 2015'*) provide detailed guidance and policy requirements in respect of the design of new apartment developments. Where specific planning policy requirements are stated in the document, these are to take precedence over any conflicting policies and objectives of development plans, local area plans and strategic development zone planning schemes. Furthermore, these Guidelines apply to all housing developments that include apartments that may be made available for sale, whether for owner occupation or for individual lease. They also apply to housing developments that include apartments that are built specifically for rental purposes, whether as 'build to rent' or as 'shared accommodation'. Unless stated otherwise, they apply to both private and public schemes. These updated guidelines aim to uphold proper standards for apartment design to meet the accommodation needs of a variety of household types. They also seek to ensure that, through the application of a nationally consistent approach, new apartment developments will be affordable to construct and that supply will be forthcoming to meet the housing needs of citizens.
- 5.1.3. The *'Urban Development and Building Heights, Guidelines for Planning Authorities, 2018'* are intended to set out national planning policy guidance on building heights in

relation to urban areas, as defined by the census, building from the strategic policy framework set out in Project Ireland 2040 and the National Planning Framework. They aim to put into practice key National Policy Objectives contained in the NPF in order to move away from unsustainable “business as usual” development patterns and towards a more compact and sustainable model of urban development. Greatly increased levels of residential development in urban centres and significant increases in the building heights and overall density of development are not only to be facilitated, but are to be actively sought out and brought forward by the planning processes and particularly so at local authority and An Bord Pleanála levels. In this regard, the Guidelines require that the scope to consider general building heights of at least three to four storeys, coupled with appropriate density, in locations outside what would be defined as city and town centre areas, and which would include suburban areas, must be supported in principle at development plan and development management levels. Moreover, Specific Planning Policy Requirement 4 states the following:

‘It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more’.*

5.2. Development Plan

5.2.1. Wexford County Development Plan, 2013-2019:

Chapter 3: Core Strategy:

Section 3.4: *Settlement Strategy:*

Section 3.4.6: *Larger Towns: Gorey Town:*

SS14: To encourage new residential development to occur in the Larger Towns in accordance with the Core Strategy and Settlement Strategy and subject to compliance with normal planning and environmental criteria including the availability of adequate waste water treatment capacity and drinking water capacity and the development management standards contained in Chapter 18.

SS16: Require the phasing of land zoned for residential development. The phasing of development will be based on a clear sequential approach with the zoning extending outwards from the town centres. A strong emphasis will be placed on consolidating existing patterns of development, encouraging infill opportunities and better use of lands.

Section 3.7: *Housing Strategy*

Chapter 4: *Housing:*

Section 4.2: *Sustainable Housing:*

HP01: To promote Universal Design and Lifetime Housing in accordance with best practice and the policies and principles contained in Building for Everyone: A Universal Design Approach (National Disability Authority, 2012) and Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities and its companion document Urban Design Manual (DEHLG, 2008). Universal design is design of environment that can be accessed, understood and used to the greatest possible extent by all people regardless of their age, size or ability.

HP02: To ensure that all new housing developments represent 'Sustainable Neighbourhoods' which are inclusive and responsive to the physical or cultural needs of those who use them, are well located relative to the social, community, commercial and administrative services which sustain them and are integrated with the community within which it will be located.

- HP03:* To ensure that new housing developments contribute to the social or recreation infrastructure of the community in which they will be located either through the provision of amenities or through financial contribution.
- HP04:* To ensure that new housing development minimises the use of natural resources and impacts on natural assets. Locations selected for residential developments should maximise the potential for the use of sustainable modes of transport such as walking, cycling and the use of public transport to reduce dependence on fossil fuels. The design of the individual dwellings and associated services should minimise the use of natural energy and water.
- HP06:* To ensure that all new housing developments provide a high quality living environment with attractive and efficient buildings which are located in a high quality public realm and which are serviced by well designed and located open spaces.
- HP07:* To require all developments over 10 houses to be accompanied by an Urban Design Statement showing how the matters detailed in Chapter 17 have been taken into account in the design of the development.
- HP08:* To ensure the density of residential developments is appropriate to the location of the proposed development to ensure that land is efficiently used. In deciding on the appropriate density for a particular location the Council will have regard to the existing grain and density of the settlement, the proximity of the site to the town or village centre or public transport nodes, the availability of existing services, the Sustainable Residential Development in Urban Areas and the accompanying Urban Design Manual-A Best Practice Guide (DEHLG, 2009) and subject to normal planning and environmental criteria and the development management standards contained in Chapter 18.
- HP15:* To require all applications for residential development of 10 houses or more to contain a mix of house types. The mix of house types shall be appropriate to the needs identified where the scheme will be located. This will not apply where it can be demonstrated that there is a need

for a particular type of unit and the proposed development meets this need.

Chapter 8: Transportation:

Section 8.6: *Roads*

T34: To restrict development:

- Where the local roads network is deficient including considerations of capacity, width, alignment, surface or structural condition.
- Which would create serious traffic congestion.
- Which would unduly obstruct other road users.

Chapter 15: Recreation, Sport and Public Rights of Way

Section 15.2: *Recreation*

RS01: To ensure that adequate amenity and recreational open space and facilities are available for all groups of the population through the zoning of appropriate lands in Town Development Plans and Local Area Plans.

Section 15.7: *Open Space*

RS29: To require the provision of good quality, accessible, well located and functional open spaces in new residential developments in accordance with the standards recommended in Sustainable Residential Development in Urban Areas: Guidelines for Planning Authorities and its companion document Urban Design Manual (DEHLG, 2008).

Chapter 17: Design:

Section 17.6: *Urban Design Guide*

Chapter 18: Development Management Standards:

Section 18.10: *Residential Development in Towns and Villages*

5.2.2. **Gorey & Environs Local Area Plan, 2017-2013:**

Land Use Zoning:

The south-eastern extent of the proposed development site is located on lands zoned as 'R: Residential' with the stated land use zoning objective 'To protect and enhance the residential amenity of existing and developed communities and to provide for new residential development, associated residential services and community facilities'. The remainder of the site area is zoned as 'OS: Open Space and Amenity' with the stated objective 'To protect and provide for recreation, open space and amenity areas'.

Other Relevant Sections / Policies:

Section 2: Housing and Social Infrastructure Delivery:

Section 2.3: Future Population and Housing:

Section 2.3.3: Sustainable Neighbourhoods

Section 2.3.7: Housing Mix

Section 2.3.8: Density

Section 2.4: Phasing

Housing Objectives:

H01: To ensure that all new residential developments in the plan area provide a high quality accessible living environment with attractive and efficient dwellings located in a high quality public realm and served by well designed and located open spaces.

H03: To facilitate new residential development in accordance with the Core Strategy and to require physical, social and community infrastructure to be provided either prior to or in tandem with this new residential development. No dwelling within that residential development shall be occupied until the required infrastructure has been provided. The required infrastructure which is identified on Maps 3 and 4 and in Appendix 1 Neighbourhood Framework Plans and Appendix 2 Implementation and Infrastructure Delivery Schedules includes

wastewater and water supply, public lighting, footpaths, cycleways, playground/play facilities, parks and schools.

H04: To require planning applications for residential developments to demonstrate how the scheme complies with the Neighbourhood Framework Plan which the subject lands are located in. It must be demonstrated how the development complies with the layout, form, density, linkages and accessibility and open space provision. Where a deviation from the framework is proposed, the application must demonstrate that this deviation does not compromise the delivery of the Framework and is equally permeable and proposes a positive relationship with adjacent existing and proposed development, including public open spaces and linkages.

H05: To require residential schemes to provide an appropriate mix of house types that will cater for the various household compositions in the plan area. In general the following house type ratio will be required in residential schemes:

- 25% two bedroom dwellings
- 30% three bedroom dwellings
- 30% four bedroom dwellings
- 15% to be allocated to any of the above based on evidence of demand.

The Council will consider a deviation from this mix ratio where it is demonstrated that there is an overprovision of a particular type of house type or there is lack of demand for a particular house type(s) in the area.

H06: To ensure that the phased development of a residential scheme delivers the quantum of public open space commensurate to the number of dwellings in that particular phase. Planning applications for residential schemes of 25 or more dwellings shall be accompanied by a detailed phasing schedule detailing the number of dwellings, amount of

public open space and infrastructure which will be developed as part of each phase.

Section 3: Urban Design Strategy:

Section 3.3: Urban Design Strategy:

Section 3.3.1: Place Concept

Section 3.4: Urban Design Objectives:

- UD01:* To require planning applications to demonstrate compliance with the Neighbourhood Framework Plan within which the subject lands are located. It must be demonstrated that the development will deliver the main components and objectives of each Neighbourhood Framework Plan with regard layout, form, density, linkages, infrastructure, open space provision and key infrastructure provision. Where a deviation from the framework is proposed, it must be demonstrated that the development does not compromise the delivery of the components or objectives of the Framework.
- UD02:* To require development to demonstrate compliance with the Urban Design Strategy and the Urban Design Guidelines contained in Appendix 1.
- UD03:* To encourage innovation in the built environment and to ensure that high quality urban design and architecture is carried out in accordance with the guidelines contained in this LAP along the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, its companion document Urban Design Manual (DEHLG, 2009), the Design Manual for Urban Roads and Street (DTTS and DECLG, 2013), the Architectural Heritage Protection - Guidelines for Planning Authorities (DAHG, 2011) and the National Disability Authority (NDA) Buildings for Everyone: A Universal Design Approach.

Section 4: Access and Movement Strategy:

Section 4.4: Access and Movement Strategy

Access and Movement Objectives:

AMS01: To ensure the design of all streets and roads in the plan area complies with the objectives and guidelines in the Design Manual for Urban Roads and Streets (Department of Transport and Department of the Environment, Community and Local Government, 2013) and the Urban Design Strategy, the Access and Movement Strategy and the Urban Design Guidelines contained in Appendix 1 of the LAP.

AMS02: To secure the provision in tandem with new developments, or provide subject to available resources, the footpath and pedestrian linkage objectives detailed on Map 3.

AMS04: To secure the provision in tandem with new developments, or provide subject to available resources, the cycle objectives detailed on Map 4.

Section 5: Greener Gorey-Open Space, Recreation and Green Infrastructure Strategy:

Section 5.3.2: Neighbourhood Parks

Section 5.3.3: 'Pocket' Open Spaces

OS02: To require a 15% provision of the overall site area for use as public open space in new residential schemes. This open space shall be provided as set out in Sections 5.3.2 Neighbourhood Parks and 5.3.3 Pocket Parks

Section 5.4.1: Provision of Playground Facilities:

OS06: To require high quality landscaped areas with play facilities within new residential developments of 50+ residential units as detailed in accordance with the standards contained in Section 5.4.1. Details of proposals shall be submitted with the planning application.

Appendix 1: Urban Design Guidelines and Neighbourhood Framework Plans:

Gorey South: Neighbourhood Framework Plan

5.3. Natural Heritage Designations

5.3.1. The following Natura 2000 sites are located in the general vicinity of the proposed development site:

- The Slaney River Special Area of Conservation (Site Code: 000791), approximately 2.9km west of the site.
- The Kilpatrick Sandhills Special Area of Conservation (Site Code: 001742), approximately 11.5km northeast of the site.

N.B. This list is not intended to be exhaustive as there are a number of other Natura 2000 sites in excess of the aforementioned distances yet within a 15km radius of the application site.

5.4. EIA Screening

- 5.4.1. Having regard to the nature and scale of the development proposed, the site location outside of any protected site and the nature of the receiving environment, the limited ecological value of the lands in question, the availability of public services, and the separation distance from the nearest sensitive location, there is no real likelihood of significant effects on the environment arising from the proposed development. The need for environmental impact assessment can, therefore, be excluded at preliminary examination and a screening determination is not required.

6.0 The Appeal

6.1. Grounds of Appeal

6.1.1. Derek and Tina O'Sullivan:

- Whilst the developer has agreed verbally to erect a 10ft. (3.05m) high wall along the (southwestern) site boundary between the proposed development and the appellants' property, this matter was not addressed in the planning application. On the basis that any such wall will require planning permission, its construction should have been sought as part of the revised site layout required by Condition No. 2 of the notification of the decision to grant permission issued by the Planning Authority.
- There are concerns as regards the impact of the proposed development on the privacy, security, and visual amenity of the appellants' adjoining commercial yard space.

- The omission of House Nos. 47-50 pursuant to Condition No. 2 of the notification of the decision to grant permission issued by the Planning Authority should not result in any associated relocation of House Nos. 43-46 closer to the appellants' property.
- The corner windows at first and second floor levels within House Nos. 43-46 will overlook the appellants' property and should be omitted.

6.1.2. Oakhill Residents:

- Whilst there is no objection to the construction of an appropriate residential development on site, there are several traffic safety concerns as regards the submitted proposal.
- The provision of 4 No. separate parallel parking areas alongside Ramstown Road will give rise to a traffic hazard on the basis that on-coming traffic will have insufficient forward visibility of any vehicles attempting to perform a parallel parking manoeuvre due to the alignment of the roadway.
- Consideration should be given to type and volume of traffic which utilises this section of Ramstown Road, with particular reference to transport lorries from a nearby mushroom production plant as well as industrial traffic from the Gorey Business Park.
- The proposal to locate communal car parking to the rear of the housing which will front onto Ramstown Road and the implication that the occupants of those dwellings will access said car parking through their rear garden areas is both flawed and impractical. Instead, the likelihood is that the future residents of House Nos. 1-28 may choose to park their vehicles along the main roadway given the greater ease of access and the lack of readily accessible car parking.
- The proposed development does not include for the provision of a pedestrian crossing over Ramstown Road and thus does not allow for the safe movement of persons across this busy section of roadway, with particular reference to any parents and children visiting the nearby 'Little Oak Academy' childcare facility.

- There are concerns for pedestrian safety as regards the crossing of Paul Funge Boulevard whilst it should also be noted that the junction of Ramstown Road / Paul Funge Boulevard is already a source of congestion.
- Given the proximity of the service road to the Oakhill / Oakwood housing estates (and the Little Oaks Academy), it is considered that future residents of the proposed development may be tempted to park in this area with the result that there will be an increased number of pedestrians attempting to cross Ramstown Road. Furthermore, any increased congestion in the vicinity of the Little Oaks Academy childcare facility will pose a danger as many parents walk their children to / from the academy.
- Residents of the proposed development may perform turning manoeuvres at the junction serving the Oakhill / Oakwood estates upon realising that all of the parallel parking spaces alongside Ramstown Road are occupied. This could result in obstruction of the junction and increase the potential for road traffic accidents.
- The majority of housing estates in Co. Wexford are accessed via a single entrance / exit onto the public road whilst a separate parallel roadway provides access to the houses and any associated car parking. Such an arrangement serves to contain the estate and also ensures a safe sustainable environment for local residents, including young children. In this respect it should be noted that several local authorities have adopted the following set of principles which have been agreed with the Department of the Environment, for example:

'All new developments will normally be required by the Planning Authority to provide off-street car parking facilities. Such facilities shall cater for the immediate and anticipated future demands of the development, and shall be located within the site. All car parking areas should be properly landscaped by the provision of trees, shrubs and grassed areas in order to ensure that damage to the visual amenities is avoided' (N.B. Extract from the Kilkenny City & Environs Development Plan, 2014).

- The *Design Manual for Urban Roads and Streets, 2013* states the following:

'We will require Local Authorities to prepare plans to retrofit areas towards creating sustainable neighbourhoods so that walking and cycling can be the best options for local trips, for example, to reach local facilities such as shops and schools'.

It is considered that the development of the subject site presents a clear opportunity to widen the lower Ramstown Road and to reduce the severity of the bend along same in the interests of traffic safety. Furthermore, the provision of cycleways on both sides of Ramstown Road could link with the existing cycle path along Paul Funge Boulevard and would serve to enhance the 'Nine Stones Cycle Loop Trail'.

- There are road safety concerns arising from the alignment of the roadway at this location and the traffic speeds along same.
- During the course of pre-planning discussions, it was indicated that individual access points onto Ramstown Road (with the exception of the main development entrance) would not be looked upon favourably, however, despite this advice, the subject proposal was approved with a total of 4 No. parallel parking areas accessed directly from Ramstown Road.
- Notwithstanding the known traffic issues in the area, the Local Authority Roads Engineer did not comment on the planning application.
- Contrary to the Planner's Report wherein it is stated that the parking provision is acceptable for a '*town centre location*', the Board is advised that the application site is located on the edge of Gorey town with less than ten residential properties between it and the open countryside.

6.2. Applicant Response

- The proposed development accords with the planning policy set out in the Gorey Town & Environs Local Area Plan, 2017-2023 which includes the '*Gorey South Neighbourhood Framework Plan*'.
- The development of the streetscape as proposed will eliminate all the existing roadside hedgerow which presently serves to slightly obscure sightlines along

the roadway. Therefore, there will be unobstructed views for safe parallel parking manoeuvres off the main carriageway.

- The 8 No. proposed parallel parking spaces will complement the parking provision throughout the wider scheme which adheres to development management guidance, including the Design Manual for Urban Roads & Streets.
- The principle of residential development including housing units that will front onto Ramstown Road on lands zoned for 'residential' purposes in the Local Area Plan is considered to be acceptable.
- The proposed development includes for adequate parking and concrete kerbing will be provided along the streetscape element of the proposal in order to deter illegal and haphazard parking practices.
- The proposal includes for a 2m wide footpath along the entire length of the scheme in order to ensure safe pedestrian access to and from the estate.
- The application site is ideally located within walking distance of Gorey Town Centre as well as a range of other shopping services and amenities.

6.3. Planning Authority Response

No further comments.

6.4. Observations

None.

6.5. Further Responses

None.

7.0 Assessment

- 7.1. From my reading of the file, inspection of the site and assessment of the relevant local, regional and national policies, I conclude that the key issues raised by the appeals are:

- The principle of the proposed development
- Overall design and layout
- Traffic considerations
- Impact on residential amenity
- Appropriate assessment

These are assessed as follows:

7.2. **The Principle of the Proposed Development:**

- 7.2.1. From a review of the Gorey & Environs Local Area Plan, 2017-2013, it is apparent that the south-eastern extent of the proposed development site is zoned as '*R: Residential*' with the stated land use zoning objective '*To protect and enhance the residential amenity of existing and developed communities and to provide for new residential development, associated residential services and community facilities*' whereas the remainder of the site is zoned as '*OS: Open Space and Amenity*' with the objective '*To protect and provide for recreation, open space and amenity areas*'. In this regard, whilst the siting of the proposed dwelling houses broadly corresponds with the extent of the '*residential*' land use zoning set out on Map 11: '*Land Use Zoning*' of the Local Area Plan and thus is acceptable in principle, on closer examination, it is clear that several of the individual housing units will actually encroach either fully or in part into those lands zoned as '*Open Space and Amenity*'. By way of further explanation, I would draw the Board's attention to Unit Nos. 27 & 28 which will certainly occupy lands zoned as open space whilst it is similarly evident that Unit Nos. 23, 24, 25, 26, 43 & 44 (and probably Unit No. 22) will also extend into the amenity lands. This would equate to c. 15% of the total number of housing units proposed.
- 7.2.2. Accordingly, given that Section 11.2: '*Land Use Zoning Objectives*' of the Local Area Plan purposively states that development which would result in the loss of lands zoned for open space and amenity will not normally be permitted, it is apparent that the development of housing on this open space will directly and materially contravene the applicable land use zoning objective at this location. Regrettably, this issue was not addressed in the Planning Authority's determination of the subject application and no comments have been made on same by any party to this appeal.

7.3. **Overall Design and Layout:**

7.3.1. **Proposed Housing Density:**

7.3.2. By way of context, I would advise the Board that Gorey has been identified as a 'larger town' in the county settlement hierarchy and has been allocated a population of 11,883 No. persons for the year 2022 by the Core Strategy which equates to an increase of 30% on the 2011 population. In addition, the Local Area Plan has acknowledged that there is a significant demand for housing in the area arising from a decline in house construction, the demand for rental accommodation, and the attractiveness of the area as a place to live.

7.3.3. The proposed development site is located in a developing residential area on the periphery of Gorey town, which is characterised by increasing pressure for development arising from its location proximate to key public transport routes and the M11 Motorway, on lands which are zoned for residential purposes and where public services and other local amenities are readily available. In this regard I would draw the Board's attention to Objective HP08 of the County Development Plan and Section 2.3.8 of the Local Area Plan wherein it is stated that the Council will have regard to the '*Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities*' and the accompanying Design Manual when considering the appropriate density for residential schemes.

7.3.4. The '*Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities, 2009*' generally encourage more sustainable urban development through the avoidance of excessive suburbanisation and the promotion of higher densities in appropriate locations. Given the site location within an approximate 1km walking distance of Gorey rail station, the Board may wish to consider if the proposed development site could be considered to be located within a public transport corridor pursuant to the definition contained in the Guidelines whereby higher residential densities at a minimum of 50 No. units per hectare are to be encouraged, subject to appropriate design and adherence to relevant amenity standards. In any event, it is clear that the subject lands can certainly be categorised as outer suburban / 'greenfield' as defined by the Guidelines where the greatest efficiency in land usage is to be achieved by providing net residential densities in the general range of 35-50 No. dwellings per hectare and that such densities (involving a variety of housing

types where possible) are to be encouraged generally. Moreover, within such areas development at net densities of less than 30 No. dwellings per hectare is generally to be discouraged in the interest of land efficiency.

7.3.5. At this point, I would also draw the Board's attention to Specific Planning Policy Requirement 4 of the '*Urban Development and Building Heights, Guidelines for Planning Authorities, 2018*' which expressly states that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure '*the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled "Sustainable Residential Development in Urban Areas (2007)" or any amending or replacement Guidelines*'.

7.3.6. The subject proposal comprises the development of 60 No. dwelling units on a site of 2.4 hectares which equates to a net density of 25 No. units per hectare. In my opinion, the density of development proposed is unacceptably low and cannot be considered to represent an efficient or economic use of land or services. The proposal would, therefore, be contrary to local planning policy and national guidance as well as the proper planning and sustainable development of the area.

(*N.B.* By way of clarity, whilst I would acknowledge that a considerable extent of the application site is zoned for 'Open Space & Amenity' in the Local Area Plan and thus is unavailable for housing development, the subject proposal is reliant on the inclusion of same in order to satisfy the applicable open space standards given that the developable area of the site makes no provision for any amenity areas of note).

7.3.7. *The Gorey South Neighbourhood Framework Plan:*

7.3.8. The proposed development site is located within the Gorey South Neighbourhood Framework Plan as set out in Appendix 1: '*Urban Design Guidelines and Neighbourhood Framework Plans*' of the Local Area Plan and in this regard I would refer the Board to Objective H04 of that plan which states the following:

'To require planning applications for residential developments to demonstrate how the scheme complies with the Neighbourhood Framework Plan which the subject lands are located in. It must be demonstrated how the development complies with the layout, form, density, linkages and accessibility and open space provision. Where a deviation from the framework is proposed, the

application must demonstrate that this deviation does not compromise the delivery of the Framework and is equally permeable and proposes a positive relationship with adjacent existing and proposed development, including public open spaces and linkages’.

7.3.9. The key objectives for the Gorey South Neighbourhood Framework Plan include:

1. To provide new local community spaces for the main development areas.
3. To provide new connections between existing and new developments in selected locations to address issues of poor local level access and permeability.
4. To enhance the current role of the country roads as green routes, by retaining established landscape features and adding new pedestrian and cyclist facilities.
5. To require more attractive, functional and permeable street and space layouts in new development, with careful attention paid to all aspects of street and space design, in accordance with the Design Manual for Urban Roads and Streets (Department of Environment, Community and Local Government, 2013).
6. To provide a new connected green infrastructure of local corridors and hubs, especially along the Banoge River and to provide for improved quality and connectivity of biodiversity, amenity (including a neighbourhood park and play areas), local water management along the corridors and within and adjoining the hubs.
9. To facilitate the design of new development areas using robust urban block structures, with a presumption in favour of a perimeter block typology.
10. To encourage a variety of building types and densities which reflect the function and hierarchy of routes and spaces in the area. The new avenue and focal spaces should provide for greater continuity and scale of building form and the secondary streets and spaces providing for lower scale and density.

7.3.10. From a review of the available mapping, it can be ascertained that the developable and residentially zoned extent of the proposed development site generally corresponds with the ‘key development site’ identified as ‘GS-3’ in the NFP (although

no further details relevant to the development of same are included in Table 17: 'Key Infrastructure'). The remainder of the site which is zoned for open space and amenity purposes, when taken in combination with the adjacent undeveloped landbank to the north / northwest, is envisaged to function as a 'Biodiversity Park' which will include an amenity walk extending between Ramstown Road to the east / southeast and the R772 Regional Road to the northwest. The developable lands (i.e. GS-3) themselves are shown as comprising a triangularly-shaped perimeter urban block with its primary frontage onto Ramstown Road whilst the remainder of the scheme will overlook the parkland area and adjacent lands.

7.3.11. Whilst I would concede that the subject proposal has taken cognisance of the intent of the NFP and has sought to incorporate aspects of same into the submitted design, I am unconvinced that the proposed development satisfactorily achieves the objectives of the plan. Although the proposal includes for a new 'streetscape' onto Ramstown Road in an effort to provide for frontage development, in my opinion, the proposed combination of conventional two and three storey construction broken into a series of primarily semi-detached & terraced blocks following the curvature of the roadway is somewhat monotonous and unimaginative. Given that this frontage development is perhaps the most important and prominent aspect of the overall proposal, and noting the requirements of Key Objective No. 9 of the NFP (i.e. to facilitate the design of new development areas using robust urban block structures, with a presumption in favour of a perimeter block typology), I would suggest that it necessitates a redesign from an urban design perspective. In addition to the foregoing, I would have further concerns as regards the wider site layout consequent on the use of conventional semi-detached & terraced units along the primary road frontage given that the subject proposal includes for approximately 170m of unbroken walling to the rear of same which will detract from the amenity of the scheme itself. Furthermore, the design of the frontage element of the scheme as submitted is lacking in permeability for pedestrians from Ramstown Road (i.e. those residents in nearby housing areas located further south such as 'The Paddocks') which is of particular relevance given the future plans to develop a biodiversity park / parkland to the immediate northwest of the site.

7.3.12. In further reference to the need to ensure adequate permeability through the scheme and beyond, whilst I note that the siting of the entrance to the proposed development

will generally correspond with the indicative route of the 'amenity walk' detailed in Figure 30 of the NFP, and although the future biodiversity park will extend into the adjacent lands to the north / northwest of the application site thereby allowing for improved access, I would have some concerns that the proposed arrangements for the routing of pedestrians / cyclists through the scheme to the future parkland are unappealing and / or uninviting. In this regard I would suggest that the route of the proposed pathway between the service road extending from Ramstown Road and the rear of Unit Nos. 25-28 will likely be interpreted by visitors to the area as an entrance to a housing estate as opposed to key amenity linkage. This difficulty could perhaps be addressed by opening the proposed link up to greater view and I note that the encroachment of Unit Nos. 23-28 into those lands zoned for open space / amenity purposes serves to conflict with same.

7.3.13. On balance, I am inclined to conclude that the overall form, scale, layout and density of the development proposed for this site is incompatible with both national guidance and local policy and further fails to satisfactorily comply with the objectives of the Gorey South Neighbourhood Framework Plan. In order to achieve the objectives of the Framework Plan, it is essential that the critical components of any new scheme, including an appropriate density, scale and form of development, are compliant with the provisions of the Plan from the outset. The precedent that would be set by the inappropriate development of the subject site could be potentially damaging to the form and character of development elsewhere within the NFP and, indeed, elsewhere within the town of Gorey and its environs.

7.3.14. Compliance with the Design Standards for New Apartments:

7.3.15. It is necessary to consider the detailed design of the proposed duplex apartment units having regard to the requirements of both local planning policy and the 'Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, 2018'. In this respect it is of particular relevance to note that where specific planning policy requirements are stated in the Guidelines, these are to take precedence over any conflicting policies or objectives contained in the development plan. Therefore, in accordance with Section 3.0 of the Guidelines I propose to assess the subject scheme as regards compliance with the relevant planning policy requirements set out in the Guidelines in relation to the following:

- Apartment mix within apartment schemes
- Apartment floor areas
- Dual aspect ratios
- Floor to ceiling height
- Apartments to stair / lift core ratios
- Storage spaces
- Amenity spaces
- Aggregate floor areas / dimensions for certain rooms

7.3.16. *Apartment Mix within Apartment Schemes:*

The proposed development provides for the construction of 12 No. two-bed (ground floor) apartments and 12 No. three-bed duplex apartments (in addition to 12 No. two-bedroom dwelling houses and 24 No. three-bedroom dwelling), and in this respect I am satisfied that the subject proposal achieves a suitable mix of unit sizes / types in accordance with the Guidelines.

7.3.17. *Apartment Floor Areas:*

7.3.18. It is a specific planning policy requirement of the Guidelines that the minimum apartment floor areas previously specified in the ‘*Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, 2007*’ continue to apply as follows:

- | | |
|------------------------------------|--------------------------|
| - 1 bedroom apartment: | Minimum 45m ² |
| - 2 bedroom apartment (3 persons): | Minimum 63m ² |
| - 2 bedroom apartment (4 persons): | Minimum 73m ² |
| - 3 bedroom apartment: | Minimum 90m ² |

7.3.19. In this respect I would advise the Board that each of the proposed apartment and duplex units has a stated floor area which satisfies the minimum requirements of the Guidelines. However, I would have some reservations that given the bedroom sizes within the proposed 2-bedroom ground floor apartment units, these units should more accurately be considered to be suitable for 4 No. persons (as opposed to the stated 3 No. person occupancy) and thus would not achieve the minimum aggregate

apartment floor area of 73m² (*N.B.* The units in question have a stated gross floor area of only 69.49m²).

7.3.20. Dual Aspect Ratios:

7.3.21. The amount of sunlight reaching an apartment significantly affects the amenity of its occupants and therefore it is a specific planning policy requirement of the Guidelines that in more central and accessible urban locations the minimum number of dual aspect apartments to be provided in any single apartment scheme will be 33% (where it is necessary to achieve a quality design in response to the subject site characteristics and ensure good street frontage where appropriate), whereas in suburban or intermediate locations the foregoing requirement is increased to 50%.

7.3.22. All of the proposed apartment units are dual-aspect and, therefore, the proposed development accords with this specific requirement of the Guidelines.

7.3.23. Floor to Ceiling Height:

7.3.24. The Guidelines state that floor-to-ceiling height affects the internal amenities of apartments (in terms of sunlight / daylight, storage space, and ventilation) and that this is of most significance at ground level where the potential for overshadowing is greatest, although it is also noted that ground level floor-to-ceiling height will also influence the future adaptability of individual apartments for potential alternative uses, depending on location. Whilst it is acknowledged that the Building Regulations suggest a minimum floor to ceiling height of 2.4m, the Guidelines also state that from a planning and amenity perspective, applicants and their designers may consider the potential for increasing the minimum apartment floor-to-ceiling height to 2.7m where height restrictions would not otherwise necessitate a reduction in the number of floors. It is also a specific planning policy requirement that ground level apartment floor to ceiling heights should be a minimum of 2.7m.

7.3.25. From a review of the submitted drawings, it is apparent that the floor to ceiling height of 2.475m within the ground floor apartment units fails to comply with Specific Planning Policy Requirement 5 (that ground level apartment floor to ceiling heights shall be a minimum of 2.7m). This is of particular relevance given my earlier concerns as regards the likelihood that these units may be occupied by 4 No. persons.

7.3.26. *Apartments to Stair / Lift Core Ratios:*

Given the nature and design of the development proposed, the subject proposal satisfies the requirements of the Guidelines in this regard.

7.3.27. *Internal Storage:*

The Guidelines state that apartment developments should include adequate provision for general storage and utility requirements in order to accommodate household utility functions such as clothes washing and the storage of bulky personal or household items. In this regard I would refer the Board to the minimum requirements for storage areas set out in Appendix 1 of the Guidelines as follows:

- One-bedroom apartment: 3m²
- Two-bedroom (3 No. person) apartment: 5m²
- Two-bedroom (4 No. person) apartment: 6m²
- Three-bedroom (or more) apartment: 9m²

7.3.28. Notably, this storage provision is to be in addition to kitchen presses and bedroom furniture (although it may be partly accommodated within these rooms provided it is also in addition to the minimum aggregate living/dining/kitchen or bedroom floor areas). The Guidelines also state that no individual storage room within an apartment should exceed 3.5m².

7.3.29. From a review of the available information, including the floor plans and the schedule of floor areas provided with the application, I would advise the Board that the proposed provision of 3.17m² of storage space for the ground floor apartments (as shown on Drg. No. 18.028.P.08) is deficient, although it is likely that additional storage could be provided within these units. Furthermore, although the schedule of floor areas for the proposed duplex units refers to 9.79m² of internal storage, this would not appear to correspond with that shown on the submitted floor plan.

7.3.30. *Additional Storage:*

7.3.31. Section 3.32 of the Guidelines states that apartment schemes should provide for the storage of bulky items outside of individual units (i.e. at ground or basement level) given that secure, ground floor storage space allocated to individual apartments and located close to the entrance to the apartment block or building is particularly useful

as it may be used for equipment such as bicycles, children's outdoor toys or buggies. However, whilst planning authorities are to be encouraged to seek the provision of such space in addition to the minimum apartment storage requirements, this would not appear to be mandatory.

7.3.32. Regrettably, the subject proposal does not include for any additional ground level storage areas for the individual apartments. Whilst the absence of any such additional storage space does not warrant a refusal of permission, I would have some concerns as regards the practicalities of bin storage for the upper floor units, particularly as the rear garden area / amenity space to the rear of the structures would appear to be intended to serve the ground floor units only (*N.B.* Further concerns arise as regards the single rear access to each individual plot which would seem to provide for a shared arrangement from the communal parking areas through the private amenity space serving the ground floor units).

7.3.33. *Private Amenity Space:*

7.3.34. It is a policy requirement of the Guidelines that adequate private amenity space be provided in the form of gardens or patios / terraces for ground floor apartments and balconies at upper levels. In this respect I would advise the Board that two-bedroom (3 No. persons) & two-bedroom (4 No. persons) apartments are to be provided with 6m² and 7m² of private amenity space respectively. Three-bedroom apartments require a minimum of 9m² of private amenity space. Consideration must also be given to certain qualitative criteria including the privacy and security of the space in question in addition to the need to optimise solar orientation and to minimise the potential for overshadowing and overlooking.

7.3.35. From a review of the submitted drawings, it can be confirmed that the overall private open space provision for each of the apartment units satisfies the minimum requirements of the Guidelines (although I refer to my previous comments as regards access for the first floor units through the amenity space serving the ground floor apartments).

7.3.36. *Communal Amenity Space:*

7.3.37. The Guidelines state that the provision and proper future maintenance of well-designed communal amenity space is critical in meeting the amenity needs of residents, with a particular emphasis being placed on the importance of accessible,

secure and usable outdoor space for families with young children and for less mobile older people, and in this respect I am satisfied that the wider scheme complies with the minimum requirements set out in Appendix 1 of the guidance.

7.3.38. Aggregate Floor Areas / Dimensions for Certain Rooms:

7.3.39. Having reviewed the submitted drawings, I am satisfied that the overall design of the proposed apartment units generally accords with the required minimum floor areas and standards (including the dimensions of certain rooms) as appended to the Guidelines, with the exception of the proposed storage provision.

7.4. Traffic Considerations:

7.4.1. Access to the proposed development will be obtained directly from Ramstown Road via a new entrance arrangement located within the north-eastern corner of the site. In this respect I am generally amenable to the selected location for the proposed site entrance on the basis that it would appear to have been informed by the indicative siting for an entrance point to these lands (and the suggested route of an amenity walk) as set out in the Gorey South Neighbourhood Framework Plan. Moreover, the positioning of the site entrance at the location proposed provides for a reasonable degree of separation from the junction serving the nearby Oakhill & Oakwood housing developments and would also achieve adequate sightlines for traffic exiting onto the public road.

7.4.2. Whilst I would acknowledge the concerns of local residents as regards the vertical and horizontal alignment of the existing roadway (as evidenced by the presence of a continuous white centreline along same), in my opinion, the proposal to remove the existing roadside boundary hedgerow and to provide for a new pedestrian footpath and grassed margin alongside same will serve to improve both visibility and overall pedestrian and traffic safety along this section of roadway. Furthermore, although it has been suggested that the subject proposal represents an opportunity to realign / widen this section of roadway, I am unconvinced of the need for any such road improvement works. Indeed, caution should be exercised in this regard as any realignment of the carriageway would not necessarily reduce vehicle speeds and could instead serve to exacerbate same. Moreover, I note that the Planning Authority has not deemed any such works to be appropriate in this instance.

- 7.4.3. Therefore, on balance, having regard to the scale of development proposed, the likely traffic volumes and speeds along this section of roadway which is subject to a speed limit of 50kph, and the road / footpath improvement measures to be undertaken as part of the development, it is my opinion that the surrounding road network has sufficient capacity to accommodate the additional traffic volumes consequent on the proposed development and that the subject proposal does not pose a risk to traffic / public safety.
- 7.4.4. With regard to the absence of pedestrian crossings over Ramstown Road and the nearby Paul Funge Boulevard, I would suggest that the future provision of suitable crossing points at appropriate locations should perhaps be left to the Planning Authority as part of a wider review of traffic safety in the area. I would also reiterate my position that the provision of a new footpath (and street lighting) along Ramstown Road as part of the proposed development will serve to improve pedestrian safety.
- 7.4.5. In relation to the proposal to provide a number of parallel parking bays alongside Ramstown Road, although the inclusion of same would perhaps function as a traffic calming measure, I am inclined to concur with the appellants that the limited number of bays proposed would likely result in haphazard parking practices and undesirable turning manoeuvres along the main carriageway which would be to the detriment of traffic safety.

7.5. **Impact on Residential Amenity:**

- 7.5.1. Concerns have been raised that the proposed development will result in overlooking of the adjacent property to the immediate southwest with an associated loss of privacy. In this regard specific reference has been made to Unit Nos. 43-50 (i.e. 2 No. three-storey blocks of apartment / duplex units) and the appellants' (Derek and Tina O'Sullivan) preference that a 10ft. (3.05m) high wall be erected along the site boundary between the proposed development and their property.
- 7.5.2. Whilst I would acknowledge that the design, proximity and orientation of Unit Nos. 47-50 may give rise to some overlooking of the appellant's property, given that the neighbouring lands in question are presently in use as a commercial yard space / compound, I am inclined to suggest that any loss of amenity attributable to the proposed development is of limited significance. However, it is of relevance to note that the adjacent lands to the immediate rear of the existing substation are zoned for

'residential' purposes and, therefore, it would be prudent to consider the potential impact of the subject proposal on the future development of same. In this respect I would have some concerns as regards the proximity of the proposed apartment balconies (and the gable end windows at first and second floor levels within the southern elevation of Unit Nos. 49 & 50) to the appellants' lands and the implications for any future development of same of housing purposes (*N.B.* The omission of these units or their substitution with House Types 'A' or 'B' would likely address the aforementioned concerns).

7.6. **Appropriate Assessment:**

- 7.6.1. Having regard to the nature and scale of the proposed development, the availability of public services, the nature of the receiving environment, and the proximity of the lands in question to the nearest European site, it is my opinion that no appropriate assessment issues arise and that the proposed development would not be likely to have a significant effect, either individually or in combination with other plans or projects, on any Natura 2000 site.

8.0 **Recommendation**

- 8.1. Having regard to the foregoing, I recommend that the decision of the Planning Authority be overturned in this instance and that permission be refused for the proposed development for the reasons and considerations set out below:

9.0 **Reasons and Considerations**

1. The site of the proposed development is located within the development boundary of the Gorey Town and Environs Local Area Plan, 2017-2023 on lands partly zoned 'Residential' and on lands partly zoned 'Open Space and Amenity' with the objective "to protect and provide for recreation, open space and amenity area". Having regard to the siting of a significant component of the residential development on lands zoned for open space and amenity, it is considered that the proposed development would materially contravene the development objective indicated in the Local Area Plan for the zoning of part of the site for open space and amenity purposes and would, therefore, be contrary to the proper planning and sustainable development of the area.

2. The site of the proposed development is on serviceable lands, within the development boundary of Gorey Town, in close proximity to social and community services. It is a requirement, under Section 2.3.8 of the Gorey Town and Environs Local Area Plan 2017-2023, that the Council has regard to the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, issued by the Department of the Environment, Heritage and Local Government in May, 2009, and accompanying Design Manual when considering the appropriate density for residential schemes. In addition, it is an objective of the planning authority (Objective HP08), as set out in Wexford County Development Plan 2013-2019, to ensure the density of residential developments is appropriate to the location of the proposed development to ensure that land is efficiently used.

Having regard to the proposed density of the development, at 25 dwelling units per hectare, it is considered that the proposed development would not be developed at a sufficiently high density to provide for an acceptable efficiency in serviceable land usage given the proximity of the site to the built-up area of Gorey Town and to established social and community services in the immediate vicinity. Furthermore, it is considered that such a low density would be contrary to these Ministerial Guidelines, which indicate that net densities less than 30 dwellings per hectare should generally be discouraged in the interest of land efficiency. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.

In addition to the above, some proposed apartments/duplexes are not fully in compliance with the section 28 Ministerial Guidelines for Planning Authorities Sustainable Urban Housing: Design Standards for New Apartments (2018) in relation to minimum storage areas and floor to ceiling heights. The proposed development would, therefore, be contrary to the section 28 Ministerial Guidelines and contrary to the proper planning and sustainable development of the area.

Robert Speer
Planning Inspector

18th June, 2019

