



An
Bord
Pleanála

Inspector's Report

ABP-317401-23

Development	Modifications to 6 apartments granted under 20150273 to 9 no. apartments consisting of reconfiguration of each level by adding 1 apartment on each level with modifications to existing elevations, landscaping, boundary treatments, drainage and site work.
Location	The former Strandfield Manor House, Strandfield, Townparks, Wexford.
Planning Authority	Wexford County Council
Planning Authority Reg. Ref.	20230370
Applicant(s)	Best Brick Developments Ltd.
Type of Application	Permission
Planning Authority Decision	Refuse Permission
Type of Appeal	First Party
Appellant(s)	Best Brick Developments Ltd
Observer(s)	None
Date of Site Inspection	15 th of February 2024
Inspector	Angela Brereton

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1.0 Site Location and Description

- 1.1. The site is located within Townparks, Strandfield Manor, Wexford Town and is accessed via the Spawell Road adjacent to the old Loreto school site. The development within Strandfield Manor cul de sac consists of a small, almost completed housing scheme with construction ongoing on lower sections of the site. Strandfield Manor is central to the scheme and is an existing detached period house, which has permission to be converted into 6no. apartments. It was noted on site that these works have not as yet taken place and that the House remains vacant and unoccupied. Works however were taking place in the grounds of the house.
- 1.2. Strandfield House is a 2/3 storey period house, with as shown on the plans submitted Lower Ground Floor, Upper Floor and First Floor levels. Access to the lower and upper ground floor is from the Strandfield Manor housing estate. The building has been previously extended and is not listed as a Protected Structure nor is it listed on the NIAH National Inventory of Architectural Heritage. Externally it appears in mainly original condition and forms a focal point in this estate of more modern development, but is in need of maintenance and repair.
- 1.3. The more recent housing constructed and occupied within the estate provides a mixture of single and two storey town houses, including duplexes and apartments, some of which have onsite parking. There is also a marked out parking area outside the frontage of Strandfield Manor.

2.0 Proposed Development

- 2.1. Permission is sought for the modification to the as granted 6no. apartments within Strandfield Manor House under planning Ref. no. 20150273 to 9 no. apartments. The proposed works is to consist of the following:
 - A reconfiguration of each level by addition 1 no. apartment on each level without increasing the floor area of the footprint of the existing building, with modification to the existing elevations consisting of changing some existing windows to allocate new proposed doors to allow access to the 4no. proposed balconies.

- All with associated landscaping, boundary treatments, drainage and site works to be carried out at the former Strandfield Manor House, Strandfield, Townparks, Co. Wexford.

3.0 Planning Authority Decision

3.1. Decision

On the 24th of May 2023, Wexford County Council refused permission for the proposed development subject to 8no. reasons. In summary these are concerned with the following: the accommodation fails to meet the minimum standards of the Wexford CDP 2022-2028; insufficient information submitted: to demonstrate compliance with the requirement for 20% Lifetime Homes; to demonstrate that the proposal complies with DMURS; that the proposed servicing would be in accordance with public health requirements; compliance with Part V has not been demonstrated; Parking issues; Privacy and Design issues with the proposed balconies; insufficient information in relation to a construction waste plan and public lighting. The proposed development would be contrary to the proper planning and sustainable development of the area.

3.2. Planning Authority Reports

3.2.1. Planning Reports

The Planner had regard to the locational context, planning history and policy and to the reports and submissions made. Their Assessment included regard to the SPPRs in the Apartment Guidelines 2020 and in summary noted the following:

- SPPR1 does not apply to this development as this is for a building refurbishment and is not a new build.
- The proposed development of 7no.1 bed and 2no. 2 bed complies with SPPR2.
- The proposed development does not comply with SPPR3 as the two bed apartments floor area would be less than the minimum standards.

- They provide that the proposed development would comply with SPPR requirements 4, 5 and 6.
- That SPPR 7, SPPR 8 and SPPR 9 which include reference to Build for Rent and shared accommodation are not applicable.
- There are no details on universal design within the application.
- They note that Communal Open Space is offered within the overall development, which has approval prior to the 2022-2023 CDP.
- They have regard to concerns relative to private open space provided by the balconies.
- The relationship between parking spaces and private open space within the development are inappropriate, particularly on the northern side of the site.
- They note that footpaths would need to be provided from the site to the overall development and public road.
- They refer to the provision of refuse and bike storage facilities.
- No details have been submitted for public lighting.
- They note that a feasibility letter has been received from Irish Water relative to a connection to water supply, but that such a letter was not received relative to the feasibility for connection to the foul sewer.
- Surface Water Attenuation plans have been submitted and the Wexford MD Engineer has no comment to make.
- A Construction Management Plan for the proposed development has not been submitted.
- They considered that insufficient information had been submitted and recommended that permission be refused for the proposed development and provide 8no. reasons.

3.3. Other Technical Reports

Borough District of Wexford Office

They had no technical observation to make.

Senior Executive Scientist (Environment)

They requested F.I be submitted – that a valid Irish Water confirmation of feasibility for the increase in no. of units (6 no. apartments under Planning ref. no. 20150273 to 9no. apartments).

3.4. **Prescribed Bodies**

Irish Water

They requested that a valid Irish Water Confirmation of Feasibility be submitted for the increase in the number of units.

3.5. **Third Party Observations**

The Residents of Strandfield Manor formally objected to the proposed development. Their submission included the following:

- They consider that the smaller size of apartments may be more suitable to city living.
- That the inclusion of a balcony by the main entrance will detract from this mid-18th century house with important urban fabric.
- An Bord Pleanala in the past refused permission for the demolition of this house because of its architectural and historic merit.
- Manor House is a focal point in the estate and visible from the public road. They would like to see respect given to a property with architectural heritage and not create a historic house into what will look like an apartment block.

4.0 **Planning History**

The Planner's Report notes that there is an extensive Planning History for the site with the more recent applications relative to the subject site being:

- PL26.223113 - Reg.Ref. 20070317 Permission granted by the Council and subsequently refused by the Board to Demolish existing Dwelling and to erect in its place a two storey over basement office building (noting the planning permission was granted to change the use of the dwelling to be demolished to

office use – Reg.Ref. no. 20020671 refers). Permission was subsequently refused by the Board for 3no. reasons having regard to the architectural merit of Strandfield House, the proposed office use being unacceptable in the context of the demolition of Strandfield House and impact on visual amenities in view of the prominent out of town location of the house.

- PL85. 241730 - Reg.Ref. W/2012/115 –Retention Permission for extensions to replace those demolished and to lower level carpark, amendments to disabled access ramp and parking layout, roadway and new perimeter fence. This was subsequently granted subject to conditions by the Board.
- Reg.Ref.20150273 – Permission refused by the Council for a change of use from existing approved use of office to the residential use to include for six apartments (3no. 3 bed and 3no. 2 bed units), with single storey extension to lower ground floor area (10.7sq.m), modification to windows on the east elevation, new entrance door on north elevation, replacement of existing sloped roof with flat roof at lower ground to east, and amendments to the existing landscape layout to include for provision of private open space in allotments and revised carparking layout and associated site works. The Council's reason for refusal included regard to the lack of essential infrastructural facilities on site and would be contrary to the proper planning and sustainable development of the area.
- Reg.Ref.20170787 – Permission granted subject to conditions by the Council for the construction of 18no. dwelling houses on the site of approved and partially completed development Reg.Ref. 20031103 and ABP Ref. no. PL26.205528 now expired (23 residential units were completed of the approved 53 residential units) and including all associated site works and connections to existing approved and completed services. Permission was also sought for alterations to approved site boundaries of Planning Reg. W2012115 (Strandfield House) all at existing Strandfield Manor Residential Development.
- Reg.Ref.20171673 – Permission granted by the Council, subject to conditions to Trenc Development Ltd. for the Conversion of Strandfield Manor House to 6no. apartments with elevational alterations and with ancillary parking and all

associated site works (previous planning permission 20020671 for office use was never implemented, currently building is shell and core).

Note: Copies of these decisions including the Board's decisions are included in the History Appendix to this Report.

5.0 Policy Context

5.1. National Planning Framework 2018-2040

National Strategic Outcome 1 - Compact Growth - recognises the need to deliver a greater proportion of residential development within existing built-up areas.

Activating these strategic areas and achieving effective density and consolidation, rather than sprawl of urban development, is a top priority.

Objectives 3A and 3B direct new housing development to existing built up areas.

NP Objective 35 seeks to increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased heights.

5.2. Section 28 Guidelines

Sustainable Urban Housing Design Standards for New Apartments Guidelines for Planning Authorities (2018, as amended)

These guidelines in their current format were originally issued in 2018, as an update of the Sustainable Urban Housing: Design Standards for New Apartments guidelines published in 2015. The 2020 update related to 'Shared Accommodation'/'Co-living' as detailed. The 2022 Guidelines were issued as a further technical update in relation to 'Build-ToRent' accommodation and to update some other references, where necessary. It is of note that the most recent Section 28 Guidelines 'Design Standards for New Apartments' were issued in 2023.

The purpose of these guidelines is to balance the achievement of high-quality apartment development with a significant increase in the overall level of apartment output. They provide guidance on matters such as locational considerations, mix of units, internal space standards, dual aspect, floor-to-ceiling heights, apartments to

stair/lift core ratios, storage space, room dimensions, amenity spaces and car parking. The Guidelines are issued under Section 28 and the Board is required to have regard to them. In particular, the Specific Planning Policy Requirements (SPPRs) contained in the guidelines take precedence over any conflicting policy contained in development plans or local area plans.

Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)

These Guidelines came into effect in January 2024 and replaced the Sustainable Residential Development in Urban Areas Guidelines (2009). The decision by the planning authority was made on the 24th May 2023 and the appeal was lodged with the Board on the 20th June 2023. The P.A. decision and the grounds of appeal were based on the previous Sustainable Residential Development in Urban Areas Guidelines and associated Best Practice Urban Design Manual (2009).

The 2024 guidelines set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements. The standards will support the delivery of more compact 'own-door' housing, as an alternative to apartment developments at the right locations. This approach will not preclude traditional forms of housing, as the standards set out are minimum rather than maximum standards.

Design Manual for Urban Roads and Streets 2019 (DMURS)

DMURS provides guidance relating to the design of urban roads and streets. The aim of these Section 28 Guidelines is to ensure compact, connected sustainable neighbourhoods based on well designed streets, integrated street networks and forms of development that will make walking and cycling, especially for local trips, more attractive. Its focus is on a holistic approach and includes regard to connectivity, permeability and accessibility.

The Architectural Heritage Protection Guidelines for Planning Authorities (2011)

Planning Authorities and An Bord Pleanála are obliged to have regard to this document which sets out national guidelines inter alia for assessing proposals relating to protected structure and architectural conservation areas. Section 1.1 on

'Why Protect our Architectural Heritage?' includes: Sympathetic maintenance, adaptation and re-use can allow the architectural heritage to yield aesthetic, environmental and economic benefits even where the original use may no longer be viable. The creative challenge is to find appropriate ways to satisfy the requirements of a structure to be safe, durable and useful on the one hand, and to retain its character and special interest on the other.

5.3. **Wexford County Development Plan 2022-2028**

Volume 1 – Written Statement

Chapter 3 provides the Core Strategy and this includes regard to Compact growth and liveable sustainable settlements. This notes in Table 3-2 that Wexford along with Gorey are designated the Level 1 Key Towns in the County. Section 3.6.1 refers to Wexford Town which is designated as Key Town in the RSES.

In order to fulfil its designation as a Key Town in the RSES and in line with RPO 11 and RPO 16, the Development Approach recommends a number of criteria.

Core Strategy Objective CS05 also applies to compact development.

Objective CS15 seeks to: *To prepare new local area plans for Wexford Town, Enniscorthy Town and New Ross Town and to ensure all future local area plans are prepared in accordance with the relevant aspects of the Development Plan Guidelines for Planning Authorities (2007), the Local Area Plan Guidelines for the Planning Authorities (2012) and all other relevant Section 28 Guidelines or any updated version of these guidelines.*

In addition: A set of strategic objectives for the town is set out at the end of this chapter (WT01-WT10). The spatial planning framework for the town will be set out in the new Wexford Town and Environs Local Area Plan.

Wexford Town Strategic Objectives WWT01 – WWT10 refer.

Sustainable Housing

Chapter 4 refers and Section 4.4 provides the Sustainable Housing Strategy.

Strategic Housing Objectives include:

Objective SH02: *To ensure that all new residential developments provide a high quality living environment with attractive and efficient buildings which are located in a high quality public realm and are serviced and linked with pedestrian and cycle lanes to well-designed and located open spaces and nature and to the town or village centre and existing and planned services.*

Section 4.6 provides Locations for Future Housing. This includes regard to apartments and to the Apartment Guidelines (2020).

Section 4.7 refers to Future Housing Delivery and the implementation of the County Housing Strategy. This also refers to Part V.

Section 4.7.2.1 refers to Density of Residential Developments. Table 4-5 provides Indicative Density and Scale. This includes regard to: 'Density in Level 1 Key Towns and Level 2 Large Towns (Settlement above 5000).

Subdivision of dwellings: *Many inner suburbs contain large houses on relatively extensive sites whose conversion to multiple dwellings without a dramatic alteration in the public character of the area is achievable. In such areas, particularly those of falling population but which are well served by public transport, their conversion to multiple occupancy should be promoted subject to safeguards regarding internal space standards, private open space and maintenance of the character of the area.*

Section 4.7.2.5 refers to Compact Growth, and 4.7.3 to Utilising Existing Housing Stock and its refurbishment.

Section 4.7.5 refers to House Types. This includes regard to Apartments:

Objective SH16 refers to new apartment developments and to compliance with the Apartment Guidelines 2020.

Objective SH19 to compliance with Part V of the Planning and Development Act 2000 (as amended).

Objective SH21 to provision of a mix of unit types.

Objective SH27 to support initiatives to refurbish and retrofit both occupied and vacant residential buildings including smart technologies, energy efficiency and micro renewable systems.

Infrastructure Strategy

Chapter 9 provides that: *This strategy is focused on the provision of high quality water, wastewater and waste management facilities and telecommunications infrastructure that will facilitate and sustain the planned growth of the county over the lifetime of the Plan and beyond.*

Strategic Objectives IS01 – ISO7 refer.

Section 9.5 refers to Water Supply. Table 9-1 to Irish Water Public Water Supplies and Capacities. (Source: Irish Water March 2022). This provides that there is capacity available in the main networks to cater for population targets.

Section 9.5.4 to Water Conservation. Objectives WS01 – WS14 refer.

Section 9.6 to Wastewater. Table 9-3 provides an 'Overview of Public Wastewater Infrastructure in Level 1- Level 4 Settlements. (Source Irish Water Capacity Register 29th of April 2020 – noting this is subject to change). This includes that Wexford Town has capacity.

Wastewater Objectives WW01 – WW14.

WW08: To facilitate the connection of existing developments to public wastewater services wherever feasible and subject to connection agreements with Irish Water and to ensure that any future development connects to the public wastewater infrastructure where it is available.

Section 9.11 refers to Flood Risk and Surface Water Management.

Volume 2 Development Management

Section 3 refers to Residential Developments.

Section 3.5 to Sub-Division of a Dwelling.

Section 3.12 to Multi-Unit Residential Schemes in Towns and Villages.

Section 3.12.1 to Mix of Dwelling Types.

Section 3.12.3 to Apartment Standards and Design.

Table 3-5 provides a summary of Sections 2-5 of the Apartment Guidelines (2020), relevant SPPRs and where they are addressed in WCDP. Table 3-6 sets out the detail of SPPRs 3-6. This also has regard to Specific Planning Policy Guidelines.

Section 3.12.4 to Public Open Space.

Section 3.12.5 refers to Other Design Considerations for Multi Units Schemes.

This includes regard to Materials, Boundary Treatments, Energy Efficiency, Comfort, Privacy and Security, Access and Refuge Storage. Reference is had to the Apartment Guidelines.

Section 6 refers to Transport and Mobility. Section 8.3 and Table 6-7 refer to the Car Parking Standards. This is 1 no. space per apartment. Table 6-10 to Bicycle Parking Standards.

Section 7 refers to Heritage and Landscape

Section 7.2 to Protected Structures

Section 7.3 to Architectural Conservation Areas

Section 7.4 to Landscape and Biodiversity.

Section 8 refers to Infrastructure and Environmental Management

Section 8.2 to Water and this includes Section 8.2.1 to Surface Water Management

Section 8.2.4 refers to Connection to Public Water or Group Water Scheme.

Section 8.3 refers to Wastewater and Section 8.3.2 to Connection to Public Wastewater Facilities.

Volume 7 provides a Landscape Character Assessment.

5.4. Natural Heritage Designations

The site is within 200m of the Wexford Harbour and Slobs SPA and of the Slaney River Valley SAC.

5.5. EIA Screening

Having regard to the modest scale of the development, and the separation from any environmentally sensitive sites, there is no real likelihood of significant effects on the environment arising from the 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

A First Party Appeal has been submitted by CDP Architecture on behalf of Best Brick Developments Limited against the Council's reasons to refuse permission for the proposed development. Their Grounds of Appeal include the following:

- They note that WCC did not allow the applicant to alter the designs put forward by requesting additional information. They contend that each reason for refusal could have been addressed, and a development subsequently granted if this process was followed.
- They provide a Summary of Items included in the Council's refusal and have regard to the Wexford CDP 2022-2028.

Item 1 - Apartment Sizes

- They refer to Appendix E as prepared by CDP architecture that demonstrates the GIFA of each apartment and its compliance with both page 51 in the Wexford CDP 2022-2028 and page 11 of guidelines set out in the Sustainable Urban Housing: Design Standards for New Apartments 2020: Guidelines for Planning Authorities issued under Section 28 of the Planning and Development Act, 2000 (as amended).

Item 2- Lifetime Homes

- This proposal is a modification to an as-granted/existing proposal to utilise the over-generous apartments and the space more efficiently while assisting in the need for housing. They submit that they were never asked by way of A.I to demonstrate this 20%. That Item 1 shows the apartments are over the minimum requirement and that the apartments can easily be modified by way of condition to demonstrate their conformity for 20% lifetime homes while being in keeping with the existing parent application and the aesthetic of the building.

Item 3 – DMURS

- This application is a modification to an as granted application by adding three units within the existing GIFA of the existing building and site plan. The proposed design and standards of the roads and pedestrian footpath are that of the current/as-granted design. These standards would not change if the no. of units increased from 6 to 9 units.

Item 4 – Irish Water

- They refer to Appendix D Lohan & Donnelly consulting engineers have stated that the existing water main networks, foul sewer, and wastewater pumping stations can accommodate three extra apartments. Following approval, by way of a prior to commencement condition of planning, an agreement with Irish Water can be made.

Item 5 – Part V

- Appendix F provides a Letter prepared by CDP Architecture, which states that contact and confirmation were made with the Local Authority in which it was agreed that the application was exempt from its Part V requirements.

Item 6 - Parking

- As per the Wexford CDP 2022-2028, Section 6.3.1 Table 6-7 Car Parking Standards, they have demonstrated that the application has more than adequate parking required. This application is a modification of an existing granted site plan (they include the parking layout). They provide details of parking, and that DAV Bike and EV can be done through a condition of the final grant.

Item 7 - Balconies

- They refer to the design of the proposed balconies and note they were not afforded the opportunity to submit a revised design that would be in harmony with Volume 2, Section 3.12.6 of the Wexford CDP. They submit that based on the façade existing form/historical setting, they ask the Board to consider the necessity of all the external balconies, particularly the front elevation.

Item 8 – Waste management

- The applicant asks that they re-submit the as-granted construction and waste management plan associated with the parent application with the increased number of units. They note that they will use the same 3rd party management company for this.
- They note that is a modification to an existing as-granted/built application and that the current street lighting proposal would not be affected by adding three apartments within the GIFA of the existing building. Following a grant of permission, the applicant can submit a revised layout by a suitable M&E Consultant, demonstrating that the existing design is still adequate.

Summary and Conclusion

- They provide that the items raised have been addressed in the First Party Appeal submission.
- They note that the subject site is within the residential land use zoning.
- They seek to promote and facilitate innovation in architectural design to produce contemporary buildings.
- To promote residential development addressing any shortfall in housing provision through active land management.
- To promote the sustainable development of vacant or under-utilised infill sites and to favourably consider high density proposals that respect the surrounding development's design and the area's character.
- To ensure that all new housing is designed in a way that is adaptable and flexible to the homeowner's changing needs as set out in The Residential Quality Standards and with regard to the Lifetime Homes guidance.
- To ensure that new homes provide for the needs of family accommodation with a satisfactory level of residential amenity, in accordance with the standards for residential accommodation.
- They conclude that the existing building has adequate space to accommodate three extra units. They ask the Board to overturn the Council's decision and to

grant permission for the subject application and allow the applicant to address any minor design issues raised by way of planning conditions.

6.2. **Planning Authority Response**

There is no response from the Planning Authority on file.

6.3. **Observations**

None noted.

6.4. **Assessment**

6.5. Having had regard to the documentation submitted, including the First Party Grounds of Appeal, and having visited the site, I would consider that the key planning issues relating to the assessment of the proposed development and this appeal case can be addressed under the following headings:

- Planning Policy Considerations
- Design and Layout
- Impact on the Character and Amenities of the Area
- Infrastructural issues
- Other issues
- Appropriate Assessment

6.6. **Planning Policy Considerations**

6.6.1. The current Wexford County Development Plan 2022-2028, has superseded the former Wexford CDP and the Town Plan, which has expired. The site is not zoned within the current Plan and the Wexford Town Local Area Plan is pending. There is therefore no specific zoning objective for the site, and the principle of the development shall be considered on its own merits, and in accordance with the current County Development Plan. The application site is within the established residential area.

6.6.2. It is of note that the Wexford County Development Plan 2022-2028 includes reference to policies for sustainable development including compact growth, sustainable transport etc. Table 3 -1 refers to the 'Integration of the NPF and RSES into the Wexford CDP 2022-2028'. Wexford is a key town as per the Settlement Strategy. It is noted that the development approach as set out in Section 3.6.1 which refers to Level 1 Key Towns, includes that the spatial planning framework for the town will be set out in the new Wexford Town and Environs LAP.

6.6.3. The Planning Policy Section above notes policies and objectives relevant to residential development. Section 4.7.5 of Volume 1 of the Wexford CDP 2022-2028 refers to House Types. This includes regard to compliance with the 'Sustainable Urban Housing: Design Standards for New Apartments' Guidelines 2020:

All apartment developments in the county, where private or public, must comply with the new Apartments Guidelines. The Guidelines include nine SPPRs which must be complied with, and these have been incorporated where relevant into the Plan.

Objective SH16 refers to new apartment developments and to compliance with the Apartment Guidelines 2020.

6.6.4. It is noted that these 'Sustainable Urban Housing Design Standards for New Apartments' have been subsequently amended and regard is had to amendments made. Section 1.18 of the 2023 Apartment Guidelines includes: *Planning authorities and An Bord Pleanála are required to have regard to the guidelines and are also required to apply any specific planning policy requirements (SPPRs) of the guidelines, within the meaning of Section 28 (1C) of the Planning and Development Act 2000 (as amended) in carrying out their functions.*

6.6.5. Also, to the more recent 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)', and to the amendments to the SPPRs therein as relevant to the subject application. In this case regard is had to the documentation submitted and the development of Strandfield Manor in previous permissions and to the planning history relative to the site, noting that there is an established residential use permitted, within the house. Note is had of the Council's reasons for refusal and the First Party grounds of appeal. As noted conversion of this building to 6no. apartments has been accepted in a previous permission and it needs to be ascertained whether the Planning Authority's reasons for refusal for the

proposed development can be overcome and whether the proposal would comply with planning policy and the proper planning and sustainable development of the area.

6.7. Design and Layout

- 6.7.1. The Site Layout Plan submitted shows the layout of the permitted housing in the overall Strandfield Manor estate. Access is via the Spawell Road as existing. The total site area (shown in blue) is given as 1.53ha and that relevant to the subject site i.e. Strandfield Manor House (c. 0.17ha - shown in red). The existing floor plans for the House show 6no. 2 bed apartments have been permitted. On site I noted that these works have not commenced to the house which appears as shell and core. It is not occupied and it does not appear to have been subdivided. Some works were taking place within the grounds on the day of the site visit.
- 6.7.2. It is proposed to reduce the floor area of the 6no. approved apartments currently 2no. apartments per floor and create 9no. apartments. Therefore, this will involve a change to the approved layout to allow for 9no. apartments in total within the same floor area (shown colour coded on the as granted and proposed floor plans – Drawing no.3.1.200 relates).

Table 1 below provides the floor areas for As Granted/Proposed:

Floor Area	As Permitted	Proposed
	All 6no. Apts are 2 bedroom	Mix: 9no. - 7no. 1 bed and 2no. 2 bed
Lower Ground Floor (234.2sq.m)	Apt no.1 - 109.5 sqm (2PP) Apt no.2 - 123.5sqm (4PP)	Apt 1 – 109.5sq.m (2 bed- 2PP) Apt 2 – 52.9sqm (1bed - 2PP) Apt 3 - 1 bed - 62.4sq.m.(2PP)
Upper Ground Floor 231.5sq.m	Apt 3 - 100.1sq.m – 4PP Apt 4 - 90.1sq.m – 4PP	Apt 4 – 65.6sq.m (2 bed – 2PP)

		Apt 5 – 53.2sq.m (1bed - 2PP) Apt 6 – 72sq.m (2bed- 3PP)
First Floor 193.3sq.m	Apt 5 – 78.2sq.m – 4PP Apt 6 – 87.3sq.m – 4PP	Apt 7 – 46.9sq.m (1 bed – 2PP) Apt 8 – 47.9sq.m (1 bed - 2PP) Apt 9 – 69.1sq.m (2 bed – 3PP)

6.7.3. It is of note that a Schedule of Accommodation ‘Housing Quality Assessment’ has been submitted by CDP Architecture with the application. This has regard to the unit type and to the floor areas. While the overall floor area on each floor is not changed the current application proposes an increase in the number of apartments from 6 to 9 i.e. to subdivide that permitted and to provide an additional apartment on each of the 3no. floors.

6.7.4. The Planning Authorities first reason for refusal concerns that the proposed floor area of the 2no. two bed apartments fails to meet the minimum requirements as set out in Volume 2, Section 3.12.3 and Table 3-6 of the Wexford CDP 2022-2028. This relates to the minimum floor areas set out in the 2020 Apartment Guidelines and to SPPR 3. Table 3-6 sets out:

1-bedroom apartment (2 person) 45m²

2-bedroom apartment (3 persons) 63m² ***

2-bedroom apartment (4 persons) 73m²

3-bedroom apartment (5 persons) 90m²

This notes that the 2-bedroom (3 PP) apartment is in line with the Quality Housing for Sustainable Communities guidance published by the Department in 2007, for application to social housing schemes, planning authorities may also consider a two-

bedroom apartment to accommodate 3 persons, with a minimum floor area of 63sq.m.

6.7.5. As noted above the 1 bedroom apartments proposed all exceed the minimum standard of 45sq.m. The Planner's Report notes that the proposed development of 7no. 1 bed and 2no. 2 bed complies with SPPR2 (2020 Apartment Guidelines) but that two of the two bed apartments that less than 73sq.m would not comply with SPPR3. These minimum standards have not been changed in: 'The Design Standards for New Apartments 2023', which in Section 3.4 refer to, SPPR 3, which has regard to Minimum Apartment Floor Areas:

- Studio apartment (1 person) 37 sq.m
- 1-bedroom apartment (2 persons) 45 sq.m
- 2-bedroom apartment (4 persons) 73 sq.m
- 3-bedroom apartment (5 persons) 90 sq.m

6.7.6. Having regard to the proposed floor plans I would note that two bed apartment no. 6 at 72sq.m and no. 9 at 69sq.m are below the minimum standards of SPPR 3 of the said Guidelines. I note that the 63sq.m referred to in Table 3.6 of Volume 2 of the CDP, as noted above is not referred to in the apartment floor parameters of SPPR 3, which takes precedence. However, separately they advise that: *Planning authorities may also consider a two-bedroom apartment to accommodate 3 persons, with a minimum floor area of 63 square metres, in accordance with the standards set out in Quality Housing for Sustainable Communities (and reiterated here in Appendix 1). This type of unit may be particularly suited to certain social housing schemes such as sheltered housing.*

6.7.7. The Council's fifth reason for refusal refers to insufficient information submitted relative to Part V. In this respect it is noted and as referred to in the First Party Appeal that a Part V exemption has been submitted with the application. It does not appear that the proposed development is for consideration as social or sheltered housing. Therefore, I would consider that apartment nos. 6 and 9 would not comply with the minimum floor areas as outlined in SPPR 3 of the 'Sustainable Urban Housing: Design Standards for New Apartments', 2023.

- 6.7.8. Reason no.2 of the Planning Authority's reason for refusal concerns that insufficient information has been submitted to demonstrate compliance with the requirements for 20% Lifetime Homes. That the proposal would be contrary to Section 3.12.2 of Volume 2 of the Wexford CDP. This Section concerns Dwelling House Design' and would appear to relate more to Houses with Section 3.12.3 referring to Apartment Standards and Design.
- 6.7.9. Table 3-6 to Specific Planning Policy Requirements 3-6 of the Apartment Guidelines. The Guidelines outline that the floor area parameters set out in SPPR 3 shall generally apply to apartment schemes but do not apply to purpose-built and managed student housing. Reference is had to Appendix 1 of the Guidelines which sets out standards for apartments which must be complied with. This includes private amenity space for apartments.
- 6.7.10. Section 5.0 of the 'Sustainable Residential Development and Compact Settlements Guidelines 2024 provides Standards for Housing and this includes in Section 5.3 regard to SPPR 1 – SPPR 4. SPPR 2 includes that: *Apartments and duplex units shall be required to meet the private and semiprivate open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).*
- 6.7.11. I would note that having regard to these issues and the Housing Quality Assessment submitted, the apartments, in general, (with the exception of nos. 6 and 9 as referred to above) would appear to comply with the minimum standards. However, I do not see that communal amenity space has been provided for

6.8. **Impact on the Character and Amenities of the area**

- 6.8.1. The Planning History Section above, notes that the Board refused permission in Ref. PL26.223113 for the demolition of the existing house and the erection in its place of a two-storey over basement office building at Strandfield House. This was for 3no. reasons which included that while not a protected structure reference to the architectural and historical merit of Strandfield House. Also, to the impact this would have in this prominent location on the visual amenities of the area. The Inspectors Report relative to that case noted that the original house was built in or around 1720,

and while it was damaged by fire, the external walls of the house appear structurally sound.

- 6.8.2. While its demolition has been refused, permission subsequently has been granted to its conversion into 6no. apartments (Reg.Ref.20171673 refers). As shown on the plans submitted, elevational changes are currently proposed to accommodate the 9no. apartments. The modifications to existing elevations include changing some existing windows to allocate new proposed doors to allow access to the 4no. proposed balconies. The Plans show Existing (modifications as granted not yet constructed) and Proposed Elevations have been submitted. These show balconies proposed to the side, front and rear.
- 6.8.3. I note the Council's Reason no.7 for refusal is concerned about the privacy and design element of the balconies. I would be concerned particularly about the proposed balcony to the front elevation, which I would consider would impact adversely on the character and visual amenity of this period detached house, which is a focal point within Strandfield Manor estate. If the Board decides to permit, I would recommend that it be omitted. I would consider that the no. of balconies proposed to the rear, including those visible on the side elevation would form a proliferation of such features and would not add to the character of this period house. In addition, the configuration of those to the side (shown Elevation 4-4) could potentially cause overlooking to the balconies of adjacent residential development.
- 6.8.4. I would also consider that the changes proposed to the fenestration on the elevations to facilitate additional windows and doors would detract from the character and symmetry of those on the existing period house. While is noted that the house is not a protected structure nor in an Architectural Conservation Area, it is a mid-18th century period house in a prominent location and can be seen from the public road and forms the central focus of Strandfield Manor estate. Having regard to the plans submitted, I would consider that the development as permitted would have less of an impact on the structure and character of this period house, than that proposed.

6.9. **Infrastructural issues**

Access and Parking

- 6.9.1. Access to the site is via the existing permitted access to the estate from the Spawell Road. The current proposal does not propose to alter this. It is noted that Reason no.3 of the Council's refusal is concerned that insufficient information has been submitted to demonstrate that the development has been designed in terms of pedestrian footpaths and roads in accordance with DMURS. The First Party response provides that the proposal is for a modification to an as granted application by adding 3no. units within the existing GIFA of the building and site plan. Therefore, that the proposed development would not alter the existing standards of the roads and pedestrian footpath are as granted. That these standards would not change if the number of units increased from 6 to 9 units. While footpaths for the overall development are in place, I would concur that if the Board decides to permit that it should be conditioned that connecting footpaths should be provided to and from the application site.
- 6.9.2. The Council's Reason no.6 for the refusal is concerned that the proposed location of a number of parking spaces on the site, in relation to proposed private amenity space, and the lack of electric vehicle charging points and being contrary to Sections 6.3.3 (car parking design and layout) and 6.3.4 (dimensions of parking spaces and loading bays) of Volume 2 of the CDP. I would note that Table 6-7 provides the Car Parking Standards, this would be a maximum standard of 3no. additional spaces for the proposed 3no. apartments.
- 6.9.3. The Site Layout Plan shows that the parking layout for the greater development within the blue line boundary and within the red line boundary for the site. It is noted that the latter have not as yet been laid out. The First Party response submits that they have demonstrated that the application has more than the adequate number of parking spaces. That the applicant has 28no. parking spaces and can allocate a number for DAC Bike and EV. That this can be done by condition.
- 6.9.4. However, I would have concerns about the dimensions and the workability/circulation of some of the spaces. I would also be concerned that the overall layout within the redline boundary of the site appears to be lacking in communal open space for the apartment development and that some of the parking spaces are within this central area. If the Board decides to permit, I would recommend, that a revised parking layout be submitted, showing the parking for the apartments in accordance with current standards.

Drainage

- 6.9.5. It is proposed to connect to existing public services i.e. Foul Sewer, Surface Water Sewer and Watermain. The Council's fourth Reason for Refusal concerns that a Statement of Design Acceptance that has been agreed with Irish Water for the additional increase of apartments for the development has not been submitted in relation to the proposed watermain networks, foul sewer and wastewater pumping station and that the proposal is therefore contrary to public health.
- 6.9.6. It is noted that Irish Water and the Borough Area Engineer recommended that F.I be sought to submit a valid Irish Water Confirmation of Feasibility for the increase in the number of units. Further Information was not requested by the Council. The First Party Appeal refers to Appendix D Lohan & Donnelly Consulting Engineering have stated that the existing water main networks, foul sewer, and wastewater pumping stations can accommodate three extra apartments. That following approval by way of a prior to commencement condition of planning, an agreement can be made with Irish Water.
- 6.9.7. The Consulting Engineers Report refers to the Drainage Plans submitted for the Apartment Block. They provide details of the Foul Sewer and the Surface Water drainage. They note that the drainage system is sufficient to allow for the proposed addition of 3no. apartments. Noting that the surface water drainage for the apartment will discharge to the soakaway located in the green area. Calculations are included.
- 6.9.8. If the Board decides to permit, I would recommend, that an appropriate drainage condition be included.

6.10. **Other issues**

- 6.10.1. Reason no.8 of the Council's Refusal provides that insufficient information has been submitted in relation to a construction and construction waste plan and public lighting. The Frist Party Appeal asks that the applicant re-submits the as-granted construction and waste management plan associated with the parent planning application with the increased number of units. The Site Plan shows the location of bike space and bin storage space and a drawing has been submitted showing proposed bin and bike details.

6.10.2. The First Party notes that the applicant will use the same third-party management company for this. They note that this is a modification to an existing as granted/built application. That the current street lighting proposal would not be affected by adding three apartments within the GIFA of the existing building. That following a final grant, by way of condition of planning, the applicant can submit a revised layout by a suitable M&E consultant, demonstrating that the existing design is still adequate. If the Board decides to permit I would consider that these issues could be conditioned.

6.11. Appropriate Assessment

6.11.1. Having regard to the nature and scale of the proposed development located within an existing serviced urban area, and the distance from the nearest European site, no Appropriate Assessment issues arise, and it is not considered that the proposed development would be likely to have a significant effect, individually, or in combination with other plans or projects, on a European site.

6.12. Recommendation

6.13. I recommend that permission be refused for the reasons and considerations below.

7.0 Reasons and Considerations

1. Having regard to the character, form and symmetry of the existing Strandfield House, an 18th century period property and to its focal position within the estate, the established pattern, scale and architectural character of the area, it is considered that the proposed development, by way of the additional balconies, including on the front elevation and changes to the fenestration, would not be of an appropriate design due to its impact on form and profile. The proposed modifications would be obtrusive and overbearing and the balconies would cause overlooking and impact adversely on adjacent properties. The proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.
2. The proposed development which involves modifications and would result in an increase in the number of apartments from six number as previously permitted, to nine number, within the same gross floor space, would lead to a

reduction in floor space and result in substandard accommodation, in particular for apartment nos.6 and 9 and would not comply with Specific Planning Policy Requirement 3 of the 'Sustainable Urban Housing Design Standards for New Apartments' 2023, which are the relevant Section 28 Guidelines. The proposed development would also not comply with Section 3.12.3 (*Apartment Standards and Design*) and Table 3-6 of Volume 2 of the Wexford County Development Plan 2022-2028. The proposal would therefore be contrary to the proper planning and sustainable development of the area.

I confirm that this report represents my professional planning assessment, judgement and opinion on the matter assigned to me and that no person has influenced or sought to influence, directly or indirectly, the exercise of my professional judgement in an improper or inappropriate way.

Angela Brereton
Planning Inspector

13th of March 2024

Appendix 1 - Form 1

EIA Pre-Screening

[EIAR not submitted]

An Bord Pleanála Case Reference	ABP-317401-23		
Proposed Development Summary	Modifications to 6 apartments granted under 20150273 to 9no. apartments consisting of reconfiguration of each level by adding 1 apartment on each level with modifications to existing elevations, landscaping, boundary treatments, drainage and site work.		
Development Address	Strandfield Manor House, Strandfield Townparks, Wexford		
1. Does the proposed development come within the definition of a 'project' for the purposes of EIA? (that is involving construction works, demolition, or interventions in the natural surroundings)		Yes	
		No x	No further action required
2. Is the proposed development of a class specified in Part 1 or Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) and does it equal or exceed any relevant quantity, area or limit where specified for that class?			
Yes		Class.....	EIA Mandatory EIAR required
No	x		Proceed to Q.3
3. Is the proposed development of a class specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) but does not equal or exceed a relevant quantity, area or other limit specified [sub-threshold development]?			
		Threshold	Comment (if relevant)
			Conclusion
No	x	N/A	No EIAR or Preliminary Examination required
Yes		Class/Threshold.....	Proceed to Q.4

4. Has Schedule 7A information been submitted?

No	x	Preliminary Examination required
Yes		Screening Determination required

Inspector: _____

Date: _____