



An
Bord
Pleanála

Inspector's Report

ABP-320216-24

| | |
|-------------------------------------|---|
| Development | Construction of 26 dwellings and all associated site works. |
| Location | The Lake/Bridgetown South, Bridgetown, Co. Wexford |
| Planning Authority | Wexford County Council |
| Planning Authority Reg. Ref. | 20240502 |
| Applicant(s) | Alice Kehoe |
| Type of Application | Permission |
| Planning Authority Decision | Refuse |
| Type of Appeal | First Party |
| Appellant(s) | Alice Kehoe |
| Observer(s) | None |
| Date of Site Inspection | 27 th January 2025 |
| Inspector | Catherine Dillon |

1.0 Site Location and Description

- 1.1. The site is located approximately 600m to the east of Bridgetown village centre, 15km south west of Wexford Town. It comprises two agricultural fields to the north of the R736 and agricultural lands bound the site to the west and north. There is a large entrance into the site off the R736, with evidence of works having been carried out along the road frontage. Mature hedgerow and trees define the site's boundaries. The site slopes gently towards the western boundary and south western corner of the site.
- 1.2. Immediately to the east of the site along the R736 is a small residential development comprising 7 detached dwellings known as Hollyfields. Opposite Hollyfields on the southern side of the R736, is another residential development comprising 10 detached dwellings known as Bramble Park. A pedestrian footpath links Bramble Park to the village on the southern side of the R736.
- 1.3. Bridgetown village has a number of local amenities including a petrol filling station, Centra shop, post office and a secondary school within the village centre. Bridgetown River extends along the north of the village and flows in a westerly direction towards the coast. The site is located along the R736 within the 60kph limit and has a stated site area of 1.93 hectares.

2.0 Proposed Development

- 2.1. Permission is sought for the construction of 26 dwelling houses comprising a mixture of detached and semi-detached units. The development is described on the submitted plans as being Phase 3, and the layout plan indicates Phases 1 and 2 positioned closer to the site's frontage along the R736.
- 2.2. The proposed development would comprise the following:
 - 20 no. detached houses, 4 bedroom houses (77%),
 - 4 no. semi-detached, 3 bedroom houses (15%),
 - 2 no. semi-detached, 2 bedroom houses (8%).

A variety of 5 different style types of units are proposed.

- 2.3. Two amenity areas are proposed for the development, one of which would be located towards the north western boundary and the other more centrally located to the north west of the proposed access road. The size of these areas has not been specified.
- 2.4. Access to the proposed development would share the same access off the R736 as previously permitted development on the site and would extend through the centre of the site to the north (rear) boundary of the site. The proposed dwellings would front onto the proposed internal access road which would terminate along the north western end of the site. One of the dwellings would be served via a spur road culminating in a cul de sac off the central access road to the west which would also serve dwellings in Phase 1.
- 2.5. It is proposed to connect to the existing public foul and surface water drainage. A gravity storm water drainage system is proposed for the site. Two overground detention basins are proposed in the western and northern boundaries of the site in the amenity areas for this development. Additional SuDs measures include swale/filter strips adjacent to the road, permeable paving, and water butts.
- 2.6. The planning application was accompanied by the following:
- Part V agreement in principle
 - Design report and specifications
 - Construction Management Plan
 - A desk based Archaeological Impact Assessment
 - Waste Management Plan
 - Appropriate Assessment Screening Report
 - Infrastructure Design Report & Confirmation of Feasibility by Uisce Eireann
 - Public lighting layout
 - Landscape plan

3.0 Planning Authority Decision

3.1. Decision

On 21st June 2024, Wexford County Council issued a Notification of Decision to Refuse permission for the proposed development on the following grounds:

1. The proposed number of housing units within the proposed development is considered excessive having regard to the location of the site, the number of previously approved units, Wexford County Development Plan 2020-2028 policy to sequentially prioritise development sites closer to the village centre and the extent of residential development ongoing in the village. As such the proposed development would be contrary to objectives CSO2, CSO4, CS21, SHO6, and TV34 of Volume 1, and Section 3.4.2 of Volume 3, of the Wexford County Development Plan 2022-2028 and to the proper planning and sustainable development of the area.
2. Insufficient information has been provided in relation to pedestrian and traffic safety. The proposed development is therefore contrary to the proper planning and sustainable development the area and road safety.

3.2. Planning Authority Reports

- 3.2.1. The Planner's report dated 19th June 2024 notes the site is on the edge of Bridgetown village centre and is not zoned and is connected to the public infrastructure and footpaths are proposed. The report states the site lies within a Level 3b settlement and the population levels for such settlements should not increase by more than 20% of the 2016 population levels which for Bridgetown is 92.4 persons. The applicant has currently planning permission for 27 units on the site and the proposed development if approved would leave 39.4 units for the whole village. Notes there is a current application for 45 (P.A Ref: 20240627)¹ closer to the village which may be refused due to the over delivery of houses in Bridgetown. Considers the scale and location of the development would be inconsistent with the

¹ Refer to Section 4.1.3 of this report. This permission was subsequently granted by the P.A on 22nd Jan 2025

Core Strategy. The layout is considered acceptable and consistent with the previous permissions on the site.

3.2.2. Other Technical Reports

Roads Department: Dated 6/6/2024: Notes proposed development is Phase 3 of a of a multiple phased development on the site. Previous Road Department conditions and agreements relating to P.A Ref: 20220543 Phase 1 and P.A Ref: 20231020 Phase 2 will apply to this application.

Further information was requested on issues relating to inter alia a revised plan incorporating 2m wide footpath connectivity throughout development, 2 extra raised pedestrian priority footpath crossings, footpaths to be ramped at road junctions, EV connection points at all housing units, and relocation of signage regarding existing pole and road signage at entrance.

Chief Fire Officer: Dated 23rd May 2024: Development to comply with Technical Guidance Document B, Fire Safety Dwelling houses, Volume 2, 2017 and other matters relating to Fire Safety for dwelling houses.

Access Officer: Dated 17th May 2024: Compliance with Part M.

3.3. Prescribed Bodies

3.3.1. **Uisce Eireann:** Dated 12th June 2024. No objection in principle subject to a condition regarding a connection agreement.

3.3.2. **Department of Heritage, Local Government & Heritage:** Dated 9th June 2024. Noted the proposed development is located within the vicinity of recorded monuments WX047-127 field boundary, WX047-031 castle-tower house, WX047-032 ringfort -rath and WX047-028 penal church & enclosure. Recommended archaeological conditions be attached in the event of planning permission being granted.

3.4. Third Party Observations

None

4.0 Planning History

Subject site planning history

- 4.1.1. **P.A Ref: 20220543:** Planning permission was granted to Alice Kehoe on 18th January 2023 for the construction of 12 dwellings (comprising 10 detached and 2 semi-detached units), close to the R734 subject to 23 conditions. The site had an overall area of 1.23 hectares. Possible future phases were indicated on the submitted layout plan. This development has not been implemented. There was no phasing condition attached to this permission.

An appeal was made to ABP Ref: 315790 by a third party but was deemed invalid.

- 4.1.2. **P.A Ref: 20231020:** Planning permission was granted to Alice Kehoe on 12th February 2024 for the construction of 15 dwellings (comprising 11 detached and 4 semi-detached units) on the site. The site had an overall area of 0.95 hectares and was located to the adjacent and to the east of the site granted in P.A Ref: 20220543 above. Possible future phases were indicated on the layout plan. This development has not been implemented. This development was referred to as Phase 2. There was no phasing condition attached to this permission.

Also of note lands to south west of site reference in planner's report:

- 4.1.3. **P.A Ref: 20240627 & ABP Ref: 321674-25:** Planning permission was granted by the P.A on 22nd January 2025 to William Sarsfield for the construction of 45 dwellings at Bridgetown South subject to 32 conditions. A subsequent appeal was made to the Board and was deemed invalid.

5.0 Policy Context

5.1. Wexford County Development Plan 2022-2028

- 5.1.1. Wexford County Development Plan (CDP) came into effect on 25th July 2022. This plan identified Bridgetown as one of 8 level 3b settlements, which is the 4th tier within the settlement hierarchy of the county. It is stated within the Core Strategy of the CDP that there will be no zoning within the Plan for Level 3b settlements.

5.1.2. However, the CDP states there is a strategic imperative to prioritise the development of the villages within the 3b settlement hierarchy. The role and function of these settlements is to perform important functions including retail, commercial, education, residential, service and amenity functions for wide sub-county hinterlands. In general, these functions are far in excess of that required to support their own population. Some of the settlements have been significantly targeted for significant population growth over the lifetime of the Plan.

5.1.3. Section 3.6.4 of CDP for Level 3b Strategic Settlements - Development Approach for these settlements is:

- Tailor population growth for each settlement having regard to their existing baseline populations, potential for economic development and infrastructural capacities. When allocating population, regard was also had to the rate and pace of past development and the need to deliver social and community facilities to keep pace with recent development e.g., Bridgetown.
- Apply the sequential approach to the development of land, requiring residential development to take place within the existing footprint of the settlement. The leap frogging of infill/brownfield lands to undeveloped or greenfield lands will not be considered.
- Promote economic and enterprise development appropriate in scale to the settlements, such as expanding the potential of the marine economy and tourism in Kilmore Quay and developing the tourism potential of Kilmuckridge and Wellingtonbridge.
- Support learning, education and training initiatives, economic regeneration initiatives and enterprise to address unemployment and deprivation legacies which are evident in some of these settlements, e.g., Clonroche, Taghmon, and Bridgetown.
- Focus on maximising opportunities presented to settlements located on, or in close proximity to planned greenway routes, rail lines and the coast.
- Focus on the regeneration and renewal of these settlements.

- Ensure that new development contributes to the creation of attractive, liveable, well-designed, high-quality settlements and the local communities enjoy a high quality of life and well-being.
- Support community organisations who are working to develop community facilities and promote and facilitate initiatives in the public realm.
- Protect and enhance amenities, heritage, green infrastructure and biodiversity in these settlements.

The Council will vary the Plan to include settlement boundaries and specific objectives (and identify infill and regeneration sites) for these settlements within three years of the adoption of the County Development Plan or within one year of the adoption of the LAPs for Wexford Town, Enniscorthy Town and New Ross Town, whichever is the sooner.

Allocation of population to 3b settlements in Core Strategy

- 5.1.4. Table 3-3 of the Core Strategy allocates population growth for each settlement hierarchy which have been framed by the objectives of the NPF, the RSES and the vision for the county. The projections were prepared to ensure that the population being allocated to any settlement was reasonable having regard to the existing demographic structure of each settlement. In order to achieve a shift in population from rural areas to urban areas growth in settlements was front loaded where appropriate following the application of a capacity test for each settlement.
- 5.1.5. The table below based on Table 3-3 of the Core Strategy indicates that all the level 3b settlements had a total population figure of 3,428 in 2016, with Bridgetown having a population of 462 in the 2016 census. The population allocation for 3b settlements as specified in the Core Strategy up to 2040 is as follows:

Table 1: Allocation of Population for 3b settlements as specified in Table 3-3 of the Core Strategy

| | 2016 | 2021 | 2027 | 2031 | 2040 | Total |
|--|-------|-------|-------|-------|-------|-------|
| Population for eight 3b settlements | 3,428 | 3,628 | 3,869 | 4,019 | 4,356 | |

| | | | | | | |
|--|---|-----|-----|-----|-----|-----|
| Population increase from previous 5 years | - | 200 | 241 | 150 | 337 | 928 |
|--|---|-----|-----|-----|-----|-----|

This table is an extract from information in Table 3-3 of the CDP

Allocation of housing to all 3b settlements in Core Strategy

- 5.1.6. Table 3-4 of the Core Strategy allocates housing unit numbers for the settlement levels and a total of 164 units was allocated for all 3b settlements, with 49 (20%) to be delivered within the built up areas based on a population allocation of 241 for 2027.

Table 2: Core Strategy Population Allocations & Housing Units 2021-2027 as specified in Table 3-4 of the CDP for all 3b settlements

| Settlement Level | Core Strategy Population Allocation | Housing Units | Units to be delivered within built up area | Average Density Unit/HA |
|-------------------------|--|----------------------|---|--------------------------------|
| All Level 3b | 241 | 164 | 49 | N/A |

This table is an extract from information in Table 3-4 of the CDP

Density

- 5.1.7. There is no zoning or density requirements applied for settlements 3b, 4, 5 and 6 in the Settlement Hierarchy. The density in settlements not zoned (i.e Bridgetown) is to be determined by reference to the settlement size and the guiding densities set out in the Guidelines for Planning Authorities on Sustainable Residential Guidelines in Urban Areas (DELG, 2009).

- 5.1.8. Relevant Core Strategy objectives:

Objective CS02: To ensure that new residential development in all settlements complies with the population and housing allocation targets and the principles set out in the Core Strategy and Settlement Development Strategy, in so far as practicable.

Objective CS04: To achieve more compact growth by promoting the development of infill and brownfield/ regeneration sites and the redevelopment of underutilised land within the existing built up footprint of existing settlements in preference to greenfield

lands and to identify infill, brownfield and regeneration sites when preparing Local Area Plans, Settlement Plans and settlement boundaries.

Objective CS05: To ensure that at least 30% of all new homes that are targeted in settlements are delivered within the existing built-up footprint of the settlement.

Objective CS21: To ensure growth and development in the Service Settlements, Strategic Settlements, Large Villages and Small villages across the county is proportionate to the scale, size and character of the settlement and well designed so as to contribute to the regeneration of these settlements. To implement, as resources allow, interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services and ensure good quality of life and well-being for the local communities.

Objective CS22 To vary the County Development Plan to include Settlement Plans for Level 3a settlements and prepare boundaries and objectives for Level 3b settlements and prepare settlement boundaries for Level 4 and 5 settlements. Potential sites for infill, regeneration and appropriate locations for housing will be identified for all Level 3a, 3b, 4 and 5 settlements. To date this has not been carried out for Bridgetown.

5.1.9. **Volume 1-**

Chapter 4 - Sustainable Housing

Density & Scale of Residential Development

5.1.10. Table 4-5 of the CDP provides an indicative density and scale for all settlements within the county.

Density in Settlements between 400 and 5,000 population

5.1.11. Density is to be determined on a case by case basis with higher densities being more appropriate for centrally located sites.

Scale of development in 3 (a) & 3(b) settlements

5.1.12. Within Table 4-5 of this chapter the scale of residential development for 3(a) and 3(b) settlements is specified. Regarding Level 3 (b) settlements, the appropriate scale/number of units in each residential scheme will be determined based on the scale and characteristics of the individual settlement. It states 'In line with the Core

Strategy and with the exception of Rosslare Harbour and Kilrane, the population of the other Level 3(a) and 3(b) settlements is not to grow by more than 30% by 2040. Accordingly, the combined permitted residential development should not increase the population of a settlement by more than 20% of its 2016 population during the lifetime of this Plan.'

- 5.1.13. Bridgetown's population was stated as 462 in the Core Strategy for 2016, allowing for a 20% increase in population during the Plan's lifetime would equate to an increase in population of 92.4 for Bridgetown village.

Relevant Housing Objectives include: -

Objective SH01 To ensure that new residential developments contribute to and 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 and are integrated with the community within which they will be located.

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.

Objective SH05 To prepare Urban Design Frameworks as part of local area plans which implement the 10 Minute Town Concept and ensure the integration of key land uses such as housing, community, education, amenity and employment.

Objective SH06: To prioritise the provision of new housing in existing settlements and at an appropriate scale and density relative to the location in accordance with the National Planning Framework, the Regional Spatial and Economic Strategy for the Southern Region and the Core Strategy and the Settlement Strategy in the Plan.

Objective SH08 To ensure that at least 30% of all new homes targeted to settlements are delivered within the existing built-up footprint of those settlements.

Objective SH12 To ensure the development of land is carried out on a phased basis and to identify the priority of land for development in the relevant local area plan and in accordance with the methodology for the Prioritisation of Development Lands in

the National Planning Framework and in accordance with the relevant criteria in the Development Plan Guidelines for Planning Authorities (2007) and the Local Area Plan-Guidelines for Planning Authorities (2012) and any updated version of these documents during the lifetime of the Plan.

Chapter 4 Section 4.7.5 House Types- sets out percentage of house mix for development of 25 units or more

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

This standard will be applied to schemes of 25 or more units. The Planning Authority will consider a deviation from the above housing type mix where local requirements and/or market evidence suggest that a different housing mix is required.

5.1.14. **Chapter 5- Design and Place-making in Towns and villages**

Section 5.10.1 of this chapter places an emphasis on infill and brownfield development to prevent urban sprawl. Infill and brownfield sites are described, and the council will ensure through appropriate environmental assessments the remediation of brownfield sites. Relevant objectives include:

Objective TV08: To ensure, through the development management process that new development adds to the sense of place, quality, distinctiveness and character of towns and villages.

Objectives TV25-29: These objectives relate to permeability, integrated development, ensuing walkability, active edges to streets, and connectivity in developments.

Objective TV34: To pursue a variety of methods to increase the number of people living and working in our towns and villages in terms of investment decisions, local authority own projects and in the assessment of planning applications. Such activities and methods will include, but are not limited to:

- The creation of street networks, streets, buildings and blocks and places which is both an appropriate form of development in terms of permeability and also an effective means of achieving compact growth.
- Utilising opportunities to develop infill, backland and brownfield development.
- Active land management including site assembly and the use of CPOs.
- Appropriate zoning of new land and matters such as density and building heights in local area plans.
- Applying a more flexible approach to development management standards such as separation distances, open space provision and parking subject to performance criteria and design quality being achieved.
- Reusing or redeveloping existing sites including building more intensively • Developing institutional lands.

Objective TV 44: To ensure the scale of infill development reflects the location of the site and the characteristics of the settlement. The Council will consider the scale of infill development having regard to the need to make efficient use of centrally located sites and the prevailing scale in the area. The Council will encourage development which intensifies the use of the land to at minimum the intensity of adjoining uses but optimally, subject to the appropriate protection of amenities of adjoining residences to a higher intensity.

5.1.15. **Volume 3 Settlement Plans and Specific Objectives**

Bridgetown does not have a Settlement Plan.

5.2. **National Planning Policy Context**

National Planning Framework, Project Ireland 2040 (NPF)

The NPF seeks to achieve the compact growth of cities, towns and villages.

NPO 5: Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.

NPO 7: Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on inter alia:

Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth;

Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities;

Addressing the legacy of rapid unplanned growth, by facilitating amenities and services catch-up, jobs and/or improved sustainable transport links to the cities, together with a slower rate of population growth in recently expanded commuter settlements of all sizes;

In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.

NPO 9 outlines that settlements not identified in NPO 2a or 2b (these NOPs relate to the five cities and suburbs) may be identified for significant rates of population growth (that is 30% or more above 2016 population levels) at regional or local planning stages subject to:

- agreement with the regional assembly/local authority as appropriate;
- balance with strategies for other urban and rural areas which means that the totality of planned population growth has to be in line with the overall growth target, and
- a co-ordinated strategy that ensures alignment with investment in infrastructure and the provision of employment, together with the supporting amenities and services.

In this regard relative to Co. Wexford and in order to achieve Centres of Scale, the Core Strategy allocates 45% and 40% growth to 2040 to Wexford Town and Gorey Town respectively.

NPO 16: Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.

NPO 18a: Support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services.

NPO 18b: Develop a programme for ‘new homes in small towns and villages’ with local authorities, public infrastructure agencies such as Irish Water and local communities to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages.

NPO 33 - prioritises the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to the location.

NPO 35 - 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 building heights.

5.3. **Regional Spatial and Economic Strategy for the southern region (RSES)**

- 5.3.1. The strategy provides a long-term, strategic development framework for the future physical, economic and social development of the Southern Region.
- 5.3.2. It is envisaged that the Key Towns will be a focus for significant growth (more than 30%) Regional Policy Objective (RPO) 11 refers. Housing vacancy within Wexford Town is stated as 10.5% higher than the southern region (9.6%) and the state (9.1%).

5.4. **Section 28 & other Guidelines**

- 5.4.1. Several national planning guidelines are applicable to the proposed development. The relevant guidelines include the following:
 - *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) (Compact Settlement Guidelines, 2024)*

Section 3.3.5 of these guidelines states the key priorities for compact growth in Rural Towns and Villages where the population is less than 1,500, are as follows:

- (a) strengthen the existing urban core through the adaptation, re-use and intensification of existing building stock,
- (b) realise opportunities for infill and backland development, and
- (c) provide for sequential and sustainable housing development at the edge of the settlement at suitable locations that are closest to the urban core and are integrated into, or can be integrated into the existing built up footprint of the settlement and can be serviced by necessary supporting infrastructure.

Table 3.7 of these guidelines states that development in rural towns and villages is tailored to the scale, form and character of the settlement and the capacity of services and infrastructure (including public transport and water services infrastructure). Lands zoned for housing at the edge of rural towns and villages at locations that can be integrated into the settlement and are connected to existing walking and cycling networks can offer an effective alternative, including serviced sites, to the provision of single houses in the countryside. The density of development at such locations should respond in a positive way to the established context.

- Specific planning policy requirements (SPPR) 1- 4 relate to separation distances between habitable windows (SPPR1), minimum private open space areas (SPPR 2), car parking (SPPR3) and cycle parking and storage (SPPR4) for residential developments.
- *Design Manual for Urban Roads and Streets (DMURS) (2019).*

These guidelines place a strong focus on the needs of pedestrians, cyclists and public transport and on improving the safety of streets and enhancing placemaking.

5.5. Natural Heritage Designations

5.5.1. The site is not located on a designated site. The following designated sites are located in close proximity to the site.

- Tacumshin Lake SAC (site code: 000709) -3.9km

- Tacumshin Lake SPA (site code: 004092) – 4.1km
- Ballyteige Burrow SAC (site code: 000696) -4.5km
- Saltee Islands SAC (site code:000707) – 4.8km

5.6. EIA Screening

- 5.6.1. Having regard to the nature of the proposed development comprising 26 dwellings on a greenfield site, where infrastructural services are available and to the criteria under Schedule 7, 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. See completed Form 1 and 2 in Appendices 1 and 2.

6.0 The Appeal

6.1. Grounds of Appeal

- 6.1.1. This is a first party appeal submitted by Ian Doyle on behalf of the applicant, which address the reasons for refusal of the P.A. The main points are summarised below:

Background:

- The subject site is located to the east of the village centre on the R-736.
- A significant redevelopment of the secondary school has been recently permitted under planning registration number 20230269 which will increase the overall student numbers from circa 550 to 850 once complete.
- Two phases of development have been permitted within the applicant's land holding to date consisting of 27 units. The submitted layout for these phases included a masterplan for future phases of development. This appeal relates to the 3rd phase of development of the lands resulting in a total of 53 units. The phasing of development on the site was evident in previous planner's reports and was considered acceptable in principle.
- Upgrades to the associated wastewater treatment plant in 2006 means that there is significant capacity to accommodate additional development.

- Development is 574.9m from the village core, there is an existing footpath from the village to the subject site, and the site is c.6minutes walk from the village centre.

Pre-planning

- Disingenuous of the planning authority to suggest that the applicant was not clear with regard to the intention to develop the entire land holding.

Local Authority decision

- The reason for refusal that the development is contrary to the objectives of the core strategy is unqualified, unsubstantiated and inconsistent in the context of the two previous permitted phases of development.
- Granting of both phase 1 and 2 clearly signals the acceptance of the principle of development at this location.
- The site is serviced by infrastructure associated with phases 1 & 2 and accordance with the policies of the NPF the site should be prioritised over unserviced greenfield sites.

Population and housing stock

- Preliminary 2022 census indicates that Wexford County Council's population grew by 10% (14,197 persons) and the increase in housing stock for the same period was 5% (3,273 units).
- Housing stock increase was in line with the state average, the population of the County for the same period was 2% higher than the state average.
- Assuming an average household size of 2.7 for a population rise of 14,197 would equate to an additional 5,258 dwellings for the intercensal population increase, i.e an under provision of 1,985 units/5,360 persons.

Social & Affordable housing demand

- There is a demand for 3,563 social housing units in the County (2021 figures) with a further 376 households requiring social and affordable housing over the next 5 years. The under provision of social housing by the Local Authority (committed to 1,150 units) the remaining units can only be provided by the private sector through Part V. This is having a significant impact on supply,

demand and affordability. Considers there is a demand for 12,000 units over the 5 year plan period.

Rental market

- Refers to the cost and availability of accommodation to rent in County Wexford by way of Daft.ie., is driving process up in the county.

Policy gap

- There is an absence of a coherent strategy within the CDP to enable the Core strategy to be implemented, due to the lack of interim policy regarding the lack of zoning and absence of Local Area Plans for the larger towns in the county, resulting in ad hoc decision making.
- Failure to not include settlement boundaries, opportunity sites and zoning provisions where applicable for smaller settlements is not consistent with the practices of other local authorities.
- The absence of Plans in place for the larger settlements has a detrimental impact on developer confidence particularly when it comes to large scale residential developments and results in significant delay for future housing provision. Reference is made to a past decision by ABP 316019-23 for 222 houses in Wexford town on the absence of a coherent strategy for housing on these grounds.

Housing Targets

- The applicant considers the adjusted housing supply target for the CDP period of 6,427 units/1071 units per annum is not keeping in pace with the county's increase in population of 10% based on intercensal data.
- There is a lack of provision of housing, a backlog in social housing provision and a limited rental sector due to a lack of policy which is further hindering supply through poor adhoc decision making resulting in an under confident development sector.

Reason refusal No.1

- Location of subject site would achieve the 10 minute town concept.

- P.A's population calculations are incorrect and confuse population numbers with residential units. While 20% of Bridgetown's 2016 population equates to 92.4 persons, allowing for a household size of 2.7 persons per household, would result in a housing capacity of 35 units. Allowing for the 27 permitted units on the subject site there would remain a capacity for 8 units.
- Questions the legality of the P.A giving priority to a current planning application P.A Ref: 20240627 with regards to competitiveness, market interference, implementing a population cap and reach planning application being considered on its own merits.
- Core Strategy does not offer a justification for the 20% increase in population figures for 3a and 3b settlements over the lifetime of the CDP and for some villages this has already been achieved.
- NPO 7 and 9 facilities up to 30% or more over a 2016 population as long as it aligns with overall population targets, is plan led and justifiable.
- The 20% restriction on population growth could have implications for the viability of services in an area and flexibility should be afforded in the Core Strategy where capacity exists and the need for housing in the county.
- The proposed 53 units for phases 1,2 &3 on the subject site would equate to a 30% increase in growth and is in accordance with NPO 7 and 9 of the NPF.
- Current appeal should be afforded weight as it will complete a master planned estate, principle has been accepted for phases 1 & 2, services have been agreed by UE, valid commencement notice is underway and services as backland compared to P.A Ref: 20240627 which is an unserviced greenfield site.
- Development is proportionate to the scale, size and character of the settlement.
- Development cannot be considered as leap frogging as the principle of developing the site has been established in the permitted developments of phase 1 & 2 and is linked to the village core.

Refusal reason No. 2.

- The applicant contends this refusal reason arose as a result of a request from the road section seeking further information for minor amendments and attach a revised drawing which the applicant considers addresses the requested alterations.

6.2. Planning Authority Response

None

6.3. Observations

None

7.0 Assessment

7.1. Introduction

7.1.1. I have examined the appeal details and all other documentation on file, including all of the submissions received in relation to the appeal, the reports of the local authority and inspected the site, and having regard to relevant local/regional/national policies and guidance. There are no national monuments on the subject site, the site is located within an area of low landscape sensitivity rating, and is outside any flood zone. I therefore consider the main issues in this appeal to be as follows:

- Planning Policy and Core Strategy,
- Pedestrian and Traffic Safety,
- Layout and design of the proposed development (New Issue),
- Other matters, and
- Appropriate Assessment.

7.2. Planning Policy and Core Strategy

7.2.1. Refusal reason No.1 of the P.A considers the number of units is excessive for the site's location with regards to previously permitted units and extent of development ongoing in the village and is contrary to CDP policy which seeks to prioritise

sequential development. The first party considers the principal of the appeal development was accepted by virtue of the masterplan and phasing layout submitted with the previous planning permissions granted on the adjacent lands.

- 7.2.2. The appellant considers there is a demand and need for housing within the county, and the subject site is a backland infill site within walking distance of the village centre and questions the validity of capping population growth in the settlement in the absence of a cohesive settlement strategy.

Zoning within the County Development Plan

- 7.2.3. The current Wexford County Development Plan 2022-2028 does not include land use zoning for level 3b settlements such as Bridgetown, with the intention that the Plan would be varied to include settlement boundaries and specific objectives (and identify infill and regeneration sites) for these settlements within three years of the adoption of the CDP or within 1 year of the adoption of LAPs for Wexford Town, Enniscorthy Town and New Ross Town, whichever is the sooner. To date there has been no settlement boundaries identified for the village. I acknowledge the applicant is of the view that in the absence of identified settlement boundaries and zoning there is an element of uncertainty for developers and that it can therefore lead to adhoc and piecemeal development. I would agree the provision of land-use zoning is intended to provide a degree of certainty and clarity to the community, landowners, developers and investors regarding future development.
- 7.2.4. However, it is clear that the key objective of the Core Strategy in the CDP is to provide an evidence-based rationale for the amount of development within the county and provide a criterion against which future development decisions can be tested as being consistent with national and regional policy, thereby preventing uncertainty and ensuring future growth is carried out in a plan led and sustainable manner. The Core Strategy therefore seeks to provide new homes in locations at an appropriate scale relative to the settlement hierarchy within the CDP and in accordance with Government Guidelines and National Policy.
- 7.2.5. The general development approach for 3b settlements such as Bridgetown as stated in Section 3.6.4 of the CDP is to tailor population growth for each of the settlements having regard to their baseline populations and apply the sequential approach to the development of land to take place within the existing footprint of the settlement. The

leapfrogging of infill/brownfield lands to undeveloped land or greenfield lands will not be considered.

- 7.2.6. There are two elements to the development approach of 3b settlements such as Bridgetown as stated in Section 3.6.4. Firstly, the population growth with regards to the baseline population, and secondly the sequential development of land. I will address each of these issues in turn.

Population growth for Bridgetown

- 7.2.7. Bridgetown is a fourth tier settlement in the overall settlement hierarchy of the county and had a population of 462 in the 2016 census. The CDP allows for moderate growth and lower density development on the edge of Level 3b settlements providing such development does not increase the population by more than 20% of its 2016 population during the lifetime of the Plan. Bridgetown had a population of 462 in the 2016 census which would permit a population increase of 92.4 (20%) over the lifetime of the Plan for the village. Table 3-3 of the CDP allows for a target population allocation of 241 and housing unit allocation of 164 for all 3b settlements for the period 2021-2027.
- 7.2.8. The current proposal for 26 dwellings based on a household size of 2.7², would equate to a population increase with this development alone to 70.2 persons (15.6% of 2016 population figure). I consider a household projection based on 2.7 per household would be a conservative estimate for this development as 24 (92%) of the proposed units would either be 3 or 4 bedroomed.
- 7.2.9. The adjoining lands to the subject site by the same applicant has been granted planning permission for 27 dwellings which would equate to a population increase of 73 persons based on 2.7 people per household. Therefore, the subject site and the adjoining site would equate to a total population increase of 143 (31%), which would exceed the 20% increase specified in the Core Strategy for this type of settlement on the edge of the village. I also note that planning permission has been granted after the appeal development for 45 dwellings in the centre of the village which would equate to a further population increase of 121 persons. This would equate an increase of 264 persons (57%) of the 2016 population should all the units be built.

² Household size in latest census is stated as 2.7 persons per household

7.2.10. Table 3-3 of the Core Strategy allocates population to the settlement hierarchy from 2016 to 2040. I have outlined the population allocation for all eight 3b settlements in Table 1 in section 5.1 of this report. The population allocation for Level 3b settlements is specified as 241 from 2021 to 2027. The development the subject of this appeal in association with the adjoining lands would equate to 29% of the overall level 3b population allocation up to 2027. This amount of population growth for such a small village would need to occur in tandem with economic/recreation/service growth within the village, otherwise future residents would be forced to commute to the larger towns within the county or further afield for appropriate social facilities (such as employment, childcare and health facilities).

Housing Allocation

7.2.11. The first party contends that the rate of population growth in Wexford County has increased at a faster pace than that of the housing stock and considers that housing provision is not catering for demand, and there is an under provision of social and rental accommodation in the county. However, the applicant does not specify where this increase in growth has occurred, and I consider this growth refers to the County in general.

7.2.12. I note from the Core Strategy Monitoring report dated November 2024 for the county the 2 Key Towns of Wexford and Gorey have had the highest house completions over the 2-year period but there is no data provided for the level 3b settlements. Wexford town had 460 completions which equated to 21% of its core strategy allocation with 100% of the units completed within the settlement in accordance with compact growth. I consider it reasonable and in line with national and regional policy that the larger towns in the county have the highest rate of house completions and that the highest increase in population would occur in these towns based on national and regional policy. I also appreciate there is a time lag between planning permission being granted and housing being completed.

7.2.13. The housing unit allocation for all 3b settlements is specified as 164 units up to 2027 in Table 3-4 of the Core Strategy. I note the first party considers the P.A were aware that the current appeal development formed phase 3 of the overall lands in the applicant's ownership. However, I can find no details of the phasing time lines for the proposed masterplan. If the proposed development were to be granted it would

result in a total of 53 units on the lands. This would equate to 32% of the overall housing allocation for all eight Level 3b settlements up to 2027.

- 7.2.14. The first party has not provided any rationale or evidence based information (eg. auctioneer details, vacancy rates, housing waiting lists etc..) that there is a demand for this level of housing in Bridgetown that would justify an over provision in the housing allocation for this settlement as set out in the Core Strategy. I am also aware that Bridgetown is within commutable distance to Wexford town, and that permitting housing in this location without a proven need and in excess of the core strategy targets is promoting haphazard development, urban sprawl and poor spatial planning.
- 7.2.15. The first party contends that a significant redevelopment of the secondary school has recently been permitted which will increase the overall student numbers from 550 to 850. However, I do not consider this is an indicator for housing demand, but rather that the village is keeping pace with recent or past developments as Bridgetown is specifically referenced in Section 3.6.2 of the CDP as needing to deliver social, community and economic initiatives 'to keep pace with recent development and deprivation legacies'. I note also the CDP further considers 3b settlements as important contributors to providing important social, service and employment functions to the wider sub county hinterland.

Sequential development of land

- 7.2.16. The appellant contends that the subject site is a backland site. However, I consider the subject site is a greenfield site, albeit located to the rear of a proposed development as yet not commenced. There is a large agricultural field separating the subject lands to the west from the built edge of the village. There is no footpath currently linking the subject site to the village centre. However, there are two small residential developments in close proximity to the subject site, known as Hollyfields and Bramble Park, both of which are located further from the built edge of the village. Bramble Park on the south west of the site is connected to the village by an existing footpath. Both of these existing housing estates appear to be fully occupied and were granted planning permission before the current CDP albeit remote from the village core.

- 7.2.17. Planning permission has been granted relatively recently in 2023 for 12 houses and, in 2024 for 15 houses on lands immediately adjacent to the subject site and in the ownership of the appellant. I note the first planning application on these lands was submitted prior to the adoption of the current CDP in June 2022.
- 7.2.18. When planning permission was granted for the 27 houses on the adjacent lands to the subject site the P.A did not consider the development was contrary to the development approach for 3b settlements with regards to leapfrogging on greenfield lands. Nevertheless, the P.A in refusal reason No.1 to the appeal development considered the proposed development combined with the previous permissions adjacent results in an excessive number of housing units being so removed from the village centre. The first party refers to the previous permissions being part of a masterplan for the overall lands and that the P.A were aware of future development on the subject site. However, this masterplan was not adopted and has no statutory status and the planning permissions make no reference to the phasing of the lands by way of condition for example.
- 7.2.19. The general approach to development both nationally, regionally and locally is towards sequential development, so that development extends outwards from the centre of a village, with undeveloped lands closest to the core being given preference and encouraging infill opportunities as specified in Objectives CS04, CS05, CS21 and SH06 of the CDP and the development approach for 3b level settlements.
- 7.2.20. I consider the previous permissions for housing adjoining the subject site were not within the existing footprint of the settlement, were on greenfield lands and did not represent sequential development out from the village core. I am aware there has been a recent planning permission granted for 45 dwellings within the village core since this appeal. I consider that there are adequate sites available for moderate population growth that are closer to the village centre and within the village settlement's footprint. Furthermore, should the appeal site be developed for an additional 27 houses, it could consequentially remove the ability of other more suitable sites within the village to come forward for housing, particularly given the population targets as set out in the Core Strategy.

- 7.2.21. The applicant considers that the development is within a 6 minute walk from the village and can connect to the public waste and water infrastructure and is therefore appropriate in this location. I note from accessing Uisce Eireann's website (7/3/2025) the waste water treatment plant for Bridgetown has spare capacity and Uisce Eireann have no objections to the development. However, I consider it is important that the existing infrastructure is available when required to service future development within or closer to the village centre, if and when needed, to cater for development in a sequential manner.
- 7.2.22. Whilst the P.A have already approved 27 dwellings on the lands adjacent to the subject site, I consider the proposed development is further removed from the village than the previous houses which are slightly closer to the main road.

Conclusion

- 7.2.23. The primary purpose of the core strategy is to provide an evidence-based rationale for the quantum of population and land proposed to accommodate and align with projected housing demand over the period of the Development Plan. The Core Strategy allocation of housing units for all Level 3b settlements of which Bridgetown is one of eight for the period 2021-2027 is 164 units. This development in addition to a further 3 recent planning permissions granted both within and outside the village core would when combined, equate to a total of 98 units which would be 59.7% of the overall housing unit allocation for all 3b settlements in the county up to 2027.
- 7.2.24. The proposed population for Bridgetown would be increased from 462 in 2016 by a further conservative estimate of 264 persons when all four developments are combined which would increase the overall population by 57%. This would be in excess of the maximum increase of 20% permitted for Level 3b settlements stated in Table 4-5 of the CDP. I consider that a development of this scale on land beyond the edge of the village core would constitute haphazard and adhoc development in an area that is clearly under strong development pressure.
- 7.2.25. As such, in my view the proposed development is contrary to National Strategic Outcome 1 'Compact Growth' under the NPF and Objective CS02 of the Wexford County Development Plan 2022-2028 concerning adherence to the principles set out in the Core Strategy, including the 'Development Approach' for Level 3b settlements for Wexford County, which includes applying the sequential approach to the

development of land and the leapfrogging of infill/brownfield lands to undeveloped or greenfield lands.

7.3. Pedestrian and Traffic Safety

7.4. Refusal reason no. 2 refers to insufficient information being provided with regards to pedestrian and traffic safety and the development being contrary to the proper planning and sustainable development of the area and road safety. The Roads engineer requested further information regarding a revised layout to incorporate a 2m wide footpath on both sides of the road and cycle paths throughout the development, 2 extra raised pedestrian priority footpath crossings to the north east of the site, ramped footpaths at road junctions, EV connection and ducting points and relocation of the signage at the entrance. The applicant in their grounds of appeal have submitted a revised site layout. I consider this reason for refusal has been adequately addressed in the additional information submitted by way of this appeal.

7.5. Layout and design of the development (new issue)

- 7.5.1. This is currently a greenfield site located to the east of the core of Bridgetown village. I am cognisant that planning permission has been granted for a total of 27 units on the adjoining site and that the applicant considers the P.A were aware the subject site was to be developed as Phase 3 as indicated in a masterplan for the development of the site.
- 7.5.2. However, I consider the layout of this development is contrary to the Compact Settlement guidelines and DMuRS, both of which promote a block type layout with a permeable street network with pocket open space areas rather than 'left over spaces' used for amenity areas with pedestrians and cyclists having priority over vehicles.
- 7.5.3. The proposed development would comprise a long single vehicular access to serve the proposed 26 units which would terminate at a cul de sac along the western boundary of the site. The occupants of House Nos. 35-41 would have to walk along the roadway to access the entrance to the site.
- 7.5.4. I would consider a masterplan for the overall lands in the applicant's ownership would have incorporated a more permeable development rather than the subject site

being retrofitted at the end of a long spinal access as a result of the layout of phases 1 and 2. Future residents of the appeal development would have to access any future footpath to the village via the proposed vehicular access road, rather than the layout of the development promoting pedestrian and cyclist permeability and key desire lines to connect to, and reduce journey times to the village. I consider the layout of the development is of a suburban type layout rather than that of an organic village design layout.

Conclusion

- 7.5.5. I consider the layout of the proposed development is dominated by roads and the overall development lacks a degree of permeability and legibility. The design of the development is not reflective of a village and would appear suburban in character. The road layout would not give priority to the needs of pedestrians and other vulnerable road users, over that of vehicle traffic within the scheme to navigate easily by foot or bicycle to the village core. I therefore do not consider the proposed development promotes a sustainable form of development. I consider that the proposed development would be contrary to the provisions of the Design Manual for Urban Roads and Street issued by the Department of the Environment, Community and Local Government in 2013. While I have reservations regarding the proposed layout, given the substantive reason for refusal, I recommend that this not be included as a reason for refusal.

7.6. Other Matters

- 7.6.1. The proposed development would have a similar design and layout to that granted in the planning permissions on the adjoining site (P.A Ref: 20220543 & P.A Ref: 20231020). It would have a density of 13.4 units/hectare and comprise 20 detached and 6 semi-detached two storey houses. It is proposed to have a variety of 5 different types of house design which would include rendered walls and brick elements.
- 7.6.2. Section 4.7.5 of the CDP specifies a housing mix for developments over 25 dwellings, with 25% of the units being for 2 bedroom houses, 30% for 3 bedroom and 30% for 4/5 bedroom units, and 15% allocated to any of the aforementioned based on evidence of demand. The Planning Authority will consider a deviation from

the above housing type mix where local requirements and/or market evidence suggest that a different housing mix is required. The majority of the proposed housing (77%) would be 4 bedroom houses, with 8% only being two bedroom houses. There has been no justification submitted based on demand for the high number of 4 bedroom units in the planning application or appeal. I note the P.A did not consider this as an issue in their consideration of the proposal.

- 7.6.3. The houses would meet the minimum floor areas, required EV charging points, car parking, bin storage and private open space in accordance with the CDP standards. There would be adequate separation distances between the houses in compliance with the Compact Settlement Guidelines.
- 7.6.4. In conclusion the proposed development would not comply with Section 4.7.5 of the CDP regarding the mix for housing schemes over 25 units and over two thirds of the scheme would be for 4 bedroom houses.

8.0 AA Screening

- 8.1. Having carried out Screening for Appropriate Assessment In accordance with Section 177U of the Planning and Development Act 2000 (as amended), (Refer to Appendix 2), I conclude that the proposed development individually or in combination with other plans or projects would not be likely to give rise to significant effects on any European Site and is therefore excluded from further consideration. Appropriate Assessment is not required. This determination is based on

- The nature, scale and location of the project.
- The serviced nature of the lands.
- Distance from European Sites and intervening land uses.
- Standard best practice construction methods and pollution controls that would be employed regardless of proximity to a European site and effectiveness of same.
- Planning Authority's screening assessment.

No measures intended to avoid or reduce harmful effects on European sites were taken into account in reaching this conclusion.

9.0 Recommendation

I recommend planning permission is refused for the reason set out below.

10.0 Reasons and Considerations

1. It is the policy it is the policy of the Wexford County Development Plan 2022 to 2028 to achieve more compact growth through sequentially prioritising the development of new housing on sites within the built up footprint of settlements in preference to more greenfield and peripheral locations. The proposed development is located on an unzoned site on the eastern edge of Bridgetown village distant from the village core and local services with substantial greenfield lands located significantly closer to the village core remaining undeveloped. The proposed housing development of 26 dwellings would not represent sequential development and would exacerbate the haphazard and unplanned form of development in this area and intensify urban sprawl, and would represent an undesirable precedent for further such developments in the area. As such the proposed development would be contrary to objectives CSO2, CSO4, CS21, SHO6 and TV 34 of volume 1 of the Wexford County Development Plan 2022-2028 and, therefore 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.

Catherine Dillon
Planning Inspector

24th March 2025

11.0 Appendix 1: Form 1 EIA Pre-Screening (EIAR not submitted)

| | | | |
|--|---|--|---|
| An Bord Pleanála | | ABP 320216-24 | |
| Case Reference | | | |
| Proposed Development Summary | | Construction of 26 residential units and all associated site works | |
| Development Address | | Lake/Bridgetown, Co.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 | |
| 2. Is the proposed development of a CLASS specified in Part 1 or Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended)? | | | |
| Yes | ✓ | Class 10(b)(i) | Proceed to Q3. |
| No | | | |
| 3. Does the proposed development equal or exceed any relevant THRESHOLD set out in the relevant Class? | | | |
| Yes | | | EIA Mandatory EIAR required |
| No | ✓ | 10(b)(i) - Construction of more than 500 dwelling units | Proceed to Q4 |
| 4. Is the proposed development below the relevant threshold for the Class of development [sub-threshold development]? | | | |
| Yes | ✓ | The proposed development is for 26 units and does not exceed the 500 unit threshold. | Preliminary examination required (Form 2) |
| 5. Has Schedule 7A information been submitted? | | | |
| No | ✓ | Pre-screening determination conclusion remains as above (Q1 to Q4) | |

| | | |
|-----|--|----------------------------------|
| Yes | | Screening Determination required |
|-----|--|----------------------------------|

Inspector: _____ Date: _____

12.0 Appendix 2 : Form 2 EIA Preliminary Examination

| | |
|---|---|
| An Bord Pleanála Case Reference | ABP—320216-24 |
| Proposed Development Summary | Construction of 26 residential units and all associated site works |
| Development Address | Lake/Bridgetown, Co.Wexford |
| <p>The Board carried out a preliminary examination [ref. Art. 109(2)(a), Planning and Development regulations 2001, as amended] of at least the nature, size or location of the proposed development, having regard to the criteria set out in Schedule 7 of the Regulations.</p> <p>This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.</p> | |
| <p>Characteristics of proposed development</p> <p>(In particular, the size, design, cumulation with existing/proposed development, nature of demolition works, use of natural resources, production of waste, pollution and nuisance, risk of accidents/disasters and to human health).</p> | <p>The nature and size of the development (26 no. houses) on a 1.98 hectare site is not exceptional in the context of the existing permitted adjacent residential development. The proposed development would not result in the production of any significant waste, emissions or pollutants. Localised constructions impacts will be temporary. The development, by virtue of its type(residential), does not pose a risk of major accident and/or disaster.</p> |
| <p>Location of development</p> <p>(The environmental sensitivity of geographical areas likely to be affected by the development in particular existing and approved land use, abundance/capacity of natural resources, absorption capacity of natural environment e.g. wetland, coastal zones, nature reserves, European sites, densely populated areas,</p> | <p>The site is not located on a designated site. The nearest European site is Tacumshin Lake SAC & SPA c3.9km & 4km to the south east of the site.</p> <p>Bridgetown River to the north of the site flows in a westerly direction towards Ballyteige Burrow SAC c.4.5km to the southwest of the site.</p> |

| | |
|---|--|
| <p>landscapes, sites of historic, cultural or archaeological significance).</p> | <p>The site is not hydrologically connected to the river. It is not considered that the proposed development would be likely to have a significant impact on the European site. The site is not located on a flood zone.</p> <p><i>Archaeology:</i></p> <p>According to archaeological assessment, there are no archaeological monuments recorded within the site. The closest SMR is a watermill (SMR Ref: 047-092) c.35km to the north west of the site. I note the AHIA recommends archaeological monitoring at construction/groundworks stage.</p> <p><i>Historic & cultural:</i></p> <p>The site is a greenfield site and there are no protected structures in close proximity to the site and the site does not lie within an ACA..</p> <p><i>Landscape:</i></p> <p>The site is located within the Lowlands area of the County's landscape character which has a low sensitivity rating. No protected views/scenic routes in vicinity of the site.</p> <p>Waste Management & Construction Management Plan submitted with proposal.</p> |
|---|--|

| | | |
|--|---|------------------|
| Types and characteristics of potential impacts (Likely significant effects on environmental parameters, magnitude and spatial extent, nature of impact, transboundary, intensity and complexity, duration, cumulative effects and opportunities for mitigation). | There is no real likelihood of significant effects on the environment arising from the proposed development. There is no real likelihood of significant cumulative effects having regard to existing or permitted projects. There is no potential for significant effects on the environmental factors listed in section 171A of the Act. | |
| Conclusion | | |
| Likelihood of Significant Effects | Conclusion in respect of EIA | Yes or No |
| There is no real likelihood of significant effects on the environment. | EIA is not required. | Yes |
| There is significant and realistic doubt regarding the likelihood of significant effects on the environment. | Schedule 7A Information required to enable a Screening Determination to be carried out. | |
| There is a real likelihood of significant effects on the environment. | EIAR required. | |

Inspector: _____

Date: _____

DP/ADP: _____

Date: _____

(only where Schedule 7A information or EIAR required)

13.0 Appendix 3: Screening the need for Appropriate Assessment

Appropriate Assessment Screening Determination

(Stage 1, Article 6(3) of Habitats Directive)

I have considered the proposed residential development in light of the requirements of S177U of the Planning and Development Act 2000 as amended.

An AA Screening Report prepared by Enviroguide Consulting was submitted with the application.

Description of the site

The site is located to the east of Bridgetown village and comprises a greenfield site.

Agricultural lands, hedgerows and trees bound the boundaries of the site to the north, west and east. There is a residential development immediately to the east of the site.

No Annex 1 habitats were recorded within the proposed development site and no habitats listed as conservation objectives for Natura 2000 sites within 15km were recorded. No

watercourses are found within the site or bounding the site. The nearest watercourse is

the Bridgetown River, c.165m north of the site which flows in a westerly direction towards

Ballyteige bay. The aquifer type within the boundary of the site is a Locally Important

aquifer on bedrock which is moderately productive in local zones. The level of vulnerability of the site to groundwater contamination via human activities is low.

Description of the project

The proposed development comprises the development of 26 no. residential dwelling

houses. A detailed description is presented in Section 2 of my report and detailed

specifications of the proposal are provided in the AA Screening Report and other planning documents provided by the applicant. In summary, the proposed development site is a

greenfield site beyond the edge of the village of Bridgetown. Water and waste will be

connected to local services. Surface water will be discharged to on-site attenuation.

Consultations and submissions

Screening for Appropriate Assessment was undertaken by the Wexford County Council as part of their planning assessment and a finding of no likely significant effects on a European Site was determined.

Uisce Eireann have no objection.

European Sites

The Appropriate Assessment Screening Report submitted with the application found that

15 European Sites occur within a 15km radius of the project site. However, the report

considers that only 2 no. of European sites are located within a potential zone of influence of the proposed development. These are:

- Ballyteige Burrow SAC (site code: 000696) – c. 4.5km to the south west of the site.
- Ballyteige Burrow SPA. (site code: 004020) -c. 5.1km to the south wets of the site.

I do not consider it necessary to examine the potential for significant effects on any European Sites beyond those listed above.

| European Site | Qualifying interest (summary) | Distance | Connections |
|---|---|----------|---|
| Ballyteige Burrow SAC (site code: 000696) | Estuaries, Mudflats and sandflats not covered by seawater at low tide, Coastal lagoons Annual vegetation of drift lines Perennial vegetation of stony banks Salicornia and other annuals colonising mud and sand, Atlantic salt meadows Mediterranean salt meadows Mediterranean and thermo-Atlantic Embryonic shifting dunes Shifting dunes along the shoreline with Fixed coastal dunes with herbaceous vegetation Atlantic decalcified fixed dunes | 4.5km | Indirect connection <u>Construction phase:</u> Discharge of surface water to Bridgetown river. <u>Operational phase:</u> Surface water discharge & discharges from Bridgetown WWTP into Bridgetown River. |

| | | | |
|---|--|--|--|
| | Humid dune slacks | | |
| Ballyteige Burrow SPA (site code: 004020) | Light-bellied Brent Goose Shelduck Golden Plover Grey Plover Lapwing Black-tailed Godwit Bar-tailed Godwit Wetland and Waterbirds | | Indirect connection <u>Construction phase:</u> Noise, discharge of surface water to Bridgetown river. <u>Operational phase:</u> Surface water discharge & discharges from Bridgetown WWTP into Bridgetown River. |

Likely impacts of the project (alone or in combination with other plans and projects)

As the proposed application site is not located within or adjacent to a European site there will be no direct impacts and no risk of habitat loss, fragmentation or any other direct impact.

Construction phase:

During site clearance and construction of the proposed houses and site works, possible impact mechanisms of a temporary nature include generation of noise, dust and construction related emissions to surface water. The contained nature of the site (serviced, defined site boundaries, no direct ecological connections or pathways) and distance from receiving features connected to SPA and SAC make it highly unlikely that the proposed development could generate impacts of a magnitude that could affect European Sites. During the construction phase cement-based products, hydrocarbons and other aqueous solutions will be required on-site. Given the small quantities of these materials required onsite at any one time, the risk of significant contamination to surface water generated within the footprint of the project site will be low. In the event of contamination of surface water such contaminated surface water will drain to the ground, with soils and subsoils providing effective filtration of any surface water draining to ground. The Hydrology assessment which formed part of the AA screening indicates there is no risk to water quality given the absence of significant karst features underlying the site and location of the groundworks well above the groundwater table.

Operational phase:

During the operation phase, wastewater generated will be conveyed via existing sewerage infrastructure to the local wastewater treatment plant. Uisce Eireann have confirmed that there is sufficient capacity to treat the wastewater. Surface water will be discharged to attenuation on site and includes the use of a hydrocarbon interceptor. Given the nature of the development, there is no potential for the operation of the development to impact water quality.

Likely significant effects on the European site(s) in view of the conservation objectives set out for the qualifying features including:

The construction or operation of the proposed development will not result in impacts that could affect the conservation objectives of the SAC or SPA. Due to distance and lack of meaningful ecological connections, and the absence of any suitable foraging or nesting habitat at the site, there will be no changes in ecological functions due to any construction related emissions or disturbance. There will be no direct or ex-situ effects from disturbance on mobile species during construction or operation of the proposed development.

In combination effects

The proposed development will not result in any effects that could contribute to an additive effect with other developments in the area. No mitigation measures are required to come to these conclusions. I consider the provision of the surface water attenuation and oil/petrol interceptor a standard measure to prevent ingress of pollutants from surface water during the operation phase and is not a mitigation measure for the purpose of avoiding or preventing impacts to the SAC or SPA.

Overall Conclusion Screening Determination

In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the information considered in this AA screening, I conclude that the proposed development would not result in likely significant effects on any European Site and is therefore excluded from further consideration. Appropriate Assessment is not required.

This determination is based on:

- The relatively minor scale of the development and lack of impact mechanisms that could significantly affect a European Site.
- Location-distance from the nearest European site and lack of connections
- Taking into account screening determination by the P.A.

No mitigation measures aimed at avoiding or reducing impacts on European sites were required to be considered in reaching this conclusion.