

# Inspector's Report ACP-322874-25

**Development** Retention permission for 6 apartments

and associated site works.

**Location** Strandfield Manor House, Strandfield,

Townparks, Co. Wexford.

Planning Authority Wexford County Council

Planning Authority Reg. Ref. 20241630

Applicant(s) Best Brick Developments Limited

Type of Application Retention permission and planning

permission

Planning Authority Decision Grant permission with conditions

Type of Appeal Third Party

Appellant(s) Aoife Kinsella

**Date of Site Inspection** 01st September 2025

Inspector Sarah O'Mahony

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## 1.0 Site Location and Description

- 1.1. The 0.17ha site comprises a large dwelling subdivided into 6no. apartments and situated within a housing estate at the north of Wexford town all referred to as Strandfield Manor. The site is accessed from the Spawell road at the south while the R730 and the railway tracks are situated 150m to the north. The former Loreto convent and secondary school is situated on adjacent property to the east while all other adjacent property is in residential use and comprises detached dwellings on large plots. Dwellings within the housing estate mainly comprise two storey detached, semi-detached and terraced structures however there is also some single storey dwelling situated immediately east of the former dwelling/apartment block.
- 1.2. The former dwelling which has been converted into apartments comprises an 18<sup>th</sup> century detached, hipped roof structure with two stories over a basement/lower ground floor. It comprises 659m² of floorspace across the three floors and is not subject to any statutory architectural designations despite its historical and imposing appearance with high-quality classical architecture. It is however recorded on the NIAH (ref 15607054) as 'a house representing an integral component of the eighteenth-century domestic built heritage of Wexford' and 'Although recently damaged by fire following a prolonged period of unoccupancy, the elementary form and massing survive intact together with quantities of the original fabric, both to the exterior and to the interior where contemporary joinery; chimneypieces; and plasterwork refinements, all highlight the artistic potential of a house'. It is situated in the centre of the wider housing estate and its scale and location means it forms a central focal point for most dwellings therein as well as on approach into the estate.
- 1.3. It has been subject to recent refurbishment and is surrounded by heras fencing giving the appearance of an active construction site however no construction activity was noted during the inspection. One unit on the lower ground floor (no. 1) is stated to be occupied.

## 2.0 Proposed Development

- 2.1. Retention permission is sought for the following development:
  - Lower ground floor: Existing 2no. 2-bed apartments;

- Upper ground floor: Existing 1no. 4-bed apartment and 1no. 3-bedroom apartment and
- First floor: Existing 1no. 2-bed apartment and 1no. 3-bedroom apartment.
- 2.2. Planning permission is sought for the completion of the development which is stated to equate to 30 percent of the works and includes 2no. balconies on the rear elevation to provide private open space to the 2no. units on the upper floor, along with associated site works including landscaping, bin storage, bike storage and alterations to car parking.
- 2.3. While not specified in the published development description, the works to be retained include 2no. patios and a partition wall housing ESB meters all on the front elevation of the former dwelling, as well as subdividing the area to the rear of the manor house into two large plots of private open space to serve unit nos. 1 and 2.

### 3.0 Planning Authority Decision

#### 3.1. Further Information

- 3.1.1. 5no. items of further information were sought as set out below.
  - Submit revised plans and drawings to address the following:
    - Site layout plan reflecting the existing layout to the northwest and northeast of the building and accordingly amending the red site boundary if necessary.
    - Reduce car parking and reflect the existing scenario where pedestrian access, landscaping, cycle parking and bin storage are all illustrated as car parking areas.
    - Omission of proposed balconies to the north which are not considered appropriate to the character of the building.
    - Omission of the external patio to apartment no. 4 which conflicts with parking spaces.
    - Detailed proposals for cycle parking and bin storage.
    - Detailed proposals for the retention of existing and proposed landscaping.

- Clarification of access to remaining patios.
- Provision of EV charging infrastructure.
- Proposals for a 1.8m high capped and rendered blockwork boundary wall at the edge of the amenity area. All other boundary treatments to be submitted.
- Lighting proposals.
- Part V proposals.
- Surface water management.
- Uisce Éireann confirmation of feasibility/pre-connection application.
- Response to the third-party submissions.
- 3.1.2. A revised layout was submitted which addressed the items above. 8no. car parking spaces were proposed together with cycle parking, bin storage and enhanced pedestrian access. The patio for unit no. 4 was not omitted as requested as, following revisions to the car parking layout, it was not found to interact with car parking spaces. An additional door was provided from unit nos. 3 and 4 to their respective patios.
- 3.1.3. A detailed landscape and boundary treatment plan was submitted together with a Part V certificate of exemption, surface water management proposals and a copy of a pre-connection enquiry to Uisce Éireann.
- 3.1.4. In responding to the third-party submissions, the applicant states that the majority of concerns were addressed in the further information response.
- 3.1.5. Revised statutory notices were published and copies submitted with the application documents.

#### 3.2. Decision

- 3.2.1. Wexford County Council issued a notification to grant permission on 04<sup>th</sup> June 2025 subject to 11no. conditions including no. 9 as follows:
  - 9. Boundary treatments at the site shall be retained and constructed in accordance with the submitted details for such, with the below exception.

At the boundary of the rear (north) of the site and the adjoining area of public open space a 1.8m high block wall which is plastered and capped shall be erected within 3 months of the final date of decision.

Boundary treatments shall be maintained in a good condition. In the event that in the opinion of the Planning Authority boundary treatments deteriorate in condition such that it becomes detrimental to visual amenities then measures to repair/replace the boundary treatment shall be undertaken in accordance with a scheme for such (including timescales for implementation) to be agreed in writing by the Planning Authority.

Reason: In the interests of residential and visual amenity.

#### 3.3. Planning Authority Reports

#### 3.3.1. Planning Reports

- There are two case planner's reports, one recommending further information and the latter assessing it.
- The Planners report recommendation to grant permission is consistent with the notification of decision which issued.
- Environmental Impact Assessment (EIA) and Appropriate Assessment (AA) issues were screened out.
- It considered the principle of development is acceptable and would not give rise to any adverse amenities affecting adjoining residents within the estate or give rise to significant additional vehicular traffic generation or parking issues. This is again repeated in the assessment to the further information response and the Case Planner stated that the issues raised in the submissions have been satisfactorily addressed.
- A note from the Senior Executive Planner is included on the second Case Planner's report as follows: 'A number of issues raised by the roads section and in the submissions received appear to have been adequately addressed by way of FI, I therefore agree with the case officer's recommendation to grant this permission subject to the attached conditions.'

#### 3.3.2. Other Technical Reports

- Housing Department: Two reports received, the first requesting further information regarding Part V of the Planning and Development Act 2000 (as amended) and a 2<sup>nd</sup> report stating a Certificate of Exemption was granted and Part V does not apply.
- Roads Department: Refusal recommended due to multiple car parking inadequacies including lack of disability parking, EV charging, pedestrian access and poor drawing details. The Case Planner's report implies that the further information response was referred to the Roads Department however a subsequent second report addressing the further information response was not received.
- Enforcement Section: Report submitted providing a reference number for an enforcement case relating to the site and outlining that a warning letter was issued.

#### 3.4. Prescribed Bodies

Uisce Éireann: No response received.

#### 3.5. Third Party Observations

- 3.5.1. Submissions were received from the following during both the initial application stage as well as during the further information stage:
  - 1. Nicholas Rossiter
  - 2. Michelle Brown
  - 3. Aoife Kinsella
  - 4. Carmella O'Reilly
- 3.5.2. The following issues were raised:
  - Patios to front elevation are inappropriate architecturally and impede car parking.
     There is a lack of access and landscaping for the patios and concerns over their future use. Concerns regarding noise and privacy impacts from the patios.

- Insufficient car parking and inappropriate parking layout. Alternatives should be explored such as providing parking to the side or rear of the house. Lack of disability spaces and EV charging infrastructure.
- Drawings and documentation inaccuracies.
- Lack/absence of details and proposals regarding bin storage, public lighting, external finishes, BER rating, landscaping, boundary treatments, surface water management, universal design, bike parking and community consultation.
- Unauthorised works. Request to cease construction activity until observations are addressed.
- No requirement for additional social housing.
- Traffic management and access including pedestrian access, signage, traffic calming and sightlines etc. Lack of any Traffic Impact Assessment. Clarity required regarding operation of existing gate.
- No Construction Management Plan.
- The new gossip wall with ESB meter boxes is unauthorised and architecturally inappropriate.
- 3.5.3. Following receipt of the further information response, four submissions were raised from the same third parties listed above. Much of the issues raised are the same as above however the following new items were raised:
  - Bin and bike storage should be to the side or rear of the house with more shelter from the weather and improved vehicular interactions.
  - Additional groundworks are required to achieve the landscaping proposals.
     Additional trees should be provided. Boundaries should be provided to the rear of existing units nos. 45-50 to separate these units from the public open space to the rear of the house. Additional soft landscaping should be provided to screen retaining walls and fencing. Some proposed planting areas are currently finished with concrete. Insufficient tree protection details.
  - Concerns regarding land ownership and feasibility of implementing the landscape plan.

- Concern regarding future maintenance including to the existing estate entrance walls. A management company is required.
- Insufficient car parking proposed on revised layout.
- Previous concerns have not been addressed.
- Expert certifications regarding structural assessments and environmental studies are omitted.
- Lack of SUDS features in proposed surface water management details. Inaccuracies in the documentation referring to 8no. units.
- Boundary treatment proposals are unclear.
- Concerns regarding the gossip wall/ESB meter wall including drawing details, function and ownership, Utility Providers Compliance Statement etc.

## 4.0 **Planning History**

- 20230370, ABP ref. 317401: Permission sought for the modification to the asgranted 6 no. apartments under planning ref. no. 20150273 to 9 no. apartments. The proposed works will consist of a reconfiguration of each level by adding 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 4 No. proposed balconies. All with associated landscaping, boundary treatments, drainage and site work. Wexford County Council issued a notification of decision to refuse permission for 8no. reasons. This was appealed by the applicant to An Bord Pleanála who subsequently **refused** permission in April 2024 for the following reasons:
  - 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, and to the established pattern, scale and architectural character of the area, it is considered that the proposed development, by reason 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 would 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 Numbers 6 and 9 and would not comply with Specific Planning Policy Requirement 3 of the 'Section 28 Guidelines for Planning Authorities Design Standards for New Apartments' issued by the Department of Housing, Local Government and Heritage in September, 2023. It is further considered that the proposed development would 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 proposed development would, therefore, be contrary to the proper planning and sustainable development of the area.
- 20171673E: Extension of duration **granted** to extend the appropriate period of ref. 20171673.
- 20171673: Planning permission **granted** for conversion of Strandfield manor house to 6 no. Apartments with elevational alterations and with ancillary parking and all associated site works (previous planning permission 20020671 for office use never implemented, currently building is shell and core).
- Enforcement file ref. 0161-2023. A warning letter was issued in June 2024 regarding possible unauthorised works and change of use however no further detail is provided in the application documents.

## 5.0 **Policy Context**

#### 5.1. **Development Plan**

5.1.1. The site is governed by the policies and provisions contained in the Wexford County Development Plan 2022-2028 (referred to hereafter as the CDP).

5.1.2. Objective BH01 is an overarching objective which seeks to protect built heritage as follows:

To protect the architectural heritage of County Wexford and to include structures considered to be of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest in the Record of Protected Structures.

5.1.3. Objective BH13 is also relevant as the proposed development constitutes refurbishing an older building:

To facilitate the retention of older buildings, the Planning Authority will give consideration to the relaxation of car parking and other development management requirements in appropriate circumstances.

5.1.4. Volume 2 of the CDP is a development management manual and I note the provisions therein including sections 2.6 (amenity), 2.9 (boundary treatments) and 3.5 (sub-division of a dwelling). The latter states the following:

"The sub-division of a dwelling which has public waste water and water infrastructure will be considered where it does not detract from the character of the property, adjoining properties and the amenities of the area. The proposal will be required to meet the minimum standards relating to residential developments including services, private open space and car parking."

5.1.5. Section 3.12.3 refers to apartments and requires all apartments to comply with Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, DECLG (2020).

#### 5.1. Wexford LAP

- 5.1.1. A note on the Wexford County Council website states that the Wexford Town and Environs Development Plan 2009-2015 (as extended) has expired. A pre-draft consultation to inform the preparation of a new Wexford Local Area Plan (LAP) was undertaken in 2023 however no draft LAP has been published to date.
- 5.1.2. The land use zoning for the site under the expired Plan was for 'town centre which had the following objective:

"To protect and enhance the special physical and social character of the existing Town Centre and to provide for new and improved Town Centre facilities and uses."

#### 5.1.3. It further states:

"The purpose of this zone is to protect and enhance the special character of Wexford Town Centre and to provide for and improve retailing, commercial, office, cultural and other uses appropriate to the town centre which compliment its historic setting. It will be the objective of the Council to encourage the full use of buildings and back lands especially the full use of upper floors, preferably for residential purposes. Certain uses are best located away from the principal shopping streets because of their extensive character and their need for large-scale building forms and space requirements."

# 5.2. Section 28 Guidelines for Planning Authorities: Design Standards for New Apartments, 2023

- 5.2.1. For the information of the Coimisiún, I note that updated apartment guidelines were published in July 2025 which supercede the above noted 2023 version. Circular letter NSP 04/2025 issued to bodies including Planning Authorities, Regional Assemblies and An Coimisiún Pleanála clarified that the new guidelines are applicable to any application for planning permission and to any subsequent appeal or direct application to An Coimisiún Pleanála submitted after the issuing of the Guidelines, i.e. from 9th July 2025. This application does not fall within the scope of that definition and therefore the 2023 guidelines apply.
- 5.2.2. The 2023 guidelines, hereafter referred to as the Apartment Guidelines, provides quantitative and qualitative standards for apartment development across a range of thresholds depending on the number of units proposed and the site's context. It also sets out SPPRs to be adhered to across a range of parameters including aspect, unit mix, car parking and minimum floor areas.

#### 5.3. Natural Heritage Designations

5.3.1. The site is situated 175m south of the Slaney River Valley Special Area of Conservation (SAC). It is also situated 210m south of the Wexford Harbour Special Protection Area (SPA) and proposed Natural Heritage Area (pNHA).

#### 5.4. EIA Screening

5.4.1. The proposed development has been subject to preliminary examination for environmental impact assessment (refer to Form 1 and Form 2 in Appendices of this report). Having regard to the characteristics and location of the proposed development and the types and characteristics of potential impacts, it is considered that there is no real likelihood of significant effects on the environment. The proposed development, therefore, does not trigger a requirement for environmental impact assessment screening and an EIAR is not required.

## 6.0 The Appeal

#### 6.1. Grounds of Appeal

- The works seeking retention permission are unauthorised and do not comply with CDP standards and policies. One unit is already occupied.
- Bin storage situated at the front of the site does not comply with Sections 4.8 and 4.9 of the CDP. They detract from visual amenity of the area and raise traffic hazard concerns due to refuse trucks. There is ample space available to the rear of the site which would address these matters.
- The raised patios and gossip wall to the front of the site interrupt the coherent architectural expression of the manor house, presenting as piecemeal additions. References are made to planning history on the site and a previous ABP Inspector's report which considered balconies to the front of the structure to be inappropriate. (ABP-317401-23). This same reasoning applies to the balconies which fail to meet the design standards of section 3.126 of the CDP.

- The patios create semi-private areas in a communal circulation zone leading to a sense of overlooking and encroachment for neighbours and passers-by as well as increased potential for noise and disruption at the buildings entrance.
- Units nos. 5 and 6 have no open space while 1 and 2 have a generous overprovision of open space as demonstrated by the erection of a shed in the rear garden of no. 1. A case is therefore made that ample open space could be provided for all units to the rear of the site without compromising the architectural amenity of the front elevation.
- The area of unfinished public open space to the east of the manor house has been incrementally reduced by amendments to the parent permission over many years. This area was described as dangerous in WCC internal reports.
- The Case Planner's report states that all transportation matters are addressed however the Roads Dept report recommends a refusal of permission. No Traffic Management Plan was submitted despite the confined nature of the site and concerns raised in third party submissions. This undermines the safety of the site particularly for vulnerable road users.
- Request made to refuse permission for the unauthorised works including the patios and gossip wall,
- Require relocation of the bin storage to the rear of the manor house, and
- Require the submission of a Traffic Management Plan prepared in accordance with the Roads Department of WCC.

#### 6.2. Applicant Response

- The proposed bin storage is deemed acceptable, is positioned safely to not interfere with the vehicular entrance, car parking or reversing areas and allows easy access for all residents.
- The patios and gossip wall have been carefully designed to compliment the buildings historic character. Their materials and scale integrate harmoniously, integrating functionality with privacy without impacting the original proportions or symmetry. Wexford County council considered the arrangement acceptable.

- The patios will be surrounded by dense and high hedges creating screening for both residents and neighbours, minimising overlooking, reducing visual impact, and potentially mitigating noise and activity at the building's entrance.
- The provision of private open space has been assessed and considered acceptable by Wexford County Council. Design modifications were undertaken through the planning process including removing balconies on the upper floor.
- The existing shed in the private open space to unit no. 1 complies with planning guidance and does not require a separate grant of planning permission.
- References to an area of public open space east of the site are irrelevant as this area is outside of the red line boundary of this subject application.
- In response to the appellant's traffic safety concerns, the applicant suggests that An Coimisiún Pleanála attaches a condition requiring the preparation of a Traffic Management Plan.

#### 6.3. Planning Authority Response

No response submitted.

#### 7.0 Assessment

- 7.1. Section 3.5 of the CDP refers to subdivision of a dwelling and states that it will be considered, in circumstances where there are existing water services connections, so long as it does not detract from the character of the property, adjoining property or amenities of the area. In this regard I consider that the principle of subdividing the existing residential building into apartments is acceptable having regard to the absence of any change in the primary use of the site and presence of existing water connections. Further, I note that all internal residential standards have been met and in fact exceeded in terms of room widths, aspect and minimum floor sizes etc. As this matter was deemed acceptable by the Planning Authority and was not raised as a concern in the appeal, it will not be discussed further in this appeal.
- 7.2. I note the appeal refers to an area of unfinished public open space situated east of the site and outside of the red line boundary. I accept the applicant's response that

- this is situated outside of the red line and therefore does not relate to the works subject of this application and is outside the scope of this appeal.
- 7.3. I also note a number of drawing inaccuracies which the board should be aware of. For example, the 'existing site plan' drawings received with the application do not accurately represent the external situation on the ground, particularly with regard to the car parking layout. I note the initial drawings suggest 5no. spaces and an access road are situated parallel to the rear elevation however during the site inspection, the entire area to the rear is enclosed into two areas of private open space which are not illustrated. Bin and bike parking is illustrated which was not in place during the inspection, similarly balconies are illustrated on the rear elevation which do not exist while the gossip wall on the front elevation and shed to the rear are both in situ but not illustrated on the suite of drawings submitted initially with the application. Lastly, I note the patio to the east serving unit no. 4 is illustrated as comprising a half-moon/semi-circular structure to the front which wraps around to the side also. During the site inspection I noted the patio comprised a rectangular structure situated to the front only.
- 7.4. Revised drawings submitted with the further information response more accurately reflect the scenario I witnessed during the site inspection, other than the proposed landscaping, bin store and bike parking.
- 7.5. Having examined the application details and all other documentation on file, including all of the submissions received in relation to the appeal, the report/s of the local authority, and having inspected the site, and having regard to the relevant local/regional/national policies and guidance, I consider that the substantive issues in this appeal to be considered are as follows:
  - Architectural impact
  - Bin storage
  - Traffic impact

### 7.6. Architectural Impact

7.6.1. The appeal contends that the presence of two new raised patios and a partition wall accommodating ESB meters all on the front elevation of the former manor house

- detract from the architectural amenity of the manor house. The appeal suggests the additions represent piecemeal development disrupting the architecture of the house. It further refers to a previous proposal for a similar development where permission was refused due to the negative architectural impact of proposals to provide balconies on the front elevation. The appeal suggests that the patios and gossip wall represent the same degree of negative changes and permission should be refused again.
- 7.6.2. The gossip wall comprises a capped and rendered wall 1.8m in height situated adjacent to a set of external stairs providing access to the front door. The wall has 5no. white pvc ESB meter boxes as well as 8no. smaller similar PVC doors which cumulatively is an unsightly structure in my opinion which detracts from the front elevation of the historical building. I consider this scale of wall and arrangement of meter boxes would negatively impact the visual amenity and architecture of any building however its impact is more profound in this case when situated on the front elevation of a high-quality structure in terms of architecture. While noting that the manor house does not benefit from statutory protections, I still consider that the wall on its own even without the ESB meters would negatively impact the architecture and setting of the building by introducing an ad-hoc and piecemeal structure which detracts from the main entranceway and staircase into the building which is a primary focal point on the front elevation.
- 7.6.3. In my opinion there are a number of potential alternative locations in which to locate the ESB meters, such as any of the side elevations of the structure or a new wall potentially situated in the car park integrated into the bin storage unit, all of which would not impact the front elevation and particularly the main entrance into the manor house. I consider the current layout to be inappropriate and that permission should be refused to retain the wall as it detracts from the architectural amenity and character of the historical structure, which in turn would not comply with Objective BH01 of the CDP.
- 7.6.4. With respect to the two patios, they are raised above the ground level at the front of the manor house in order to provide level access from the upper ground floor inside. They both comprise a rectangular platform finished with render and black railings. I note the render has a large rectangular decorative feature reflecting similar features on the main dwelling. They are both surrounded by gravel hardstanding as well as

- some minimal and unfinished planting beds. The proposed site plan and landscaping proposals submitted with the further information response, as well as proposed 3D images submitted with the appeal response, all suggest additional screen planting will be provided on all sides of the patios in order to provide a sense of enclosure and privacy for residents while simultaneously addressing overlooking concerns raised in the appeal.
- 7.6.5. The 2023 Apartment Guidelines state it is a 'policy requirement that private amenity space shall be provided in the form of gardens or patios/terraces for ground floor apartments and balconies at upper levels'. It also however states that private amenity space requirements may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality for building refurbishment schemes such as this subject proposal. The CDP provides similar guidance for example Section 3.5 of the development management manual refers to the sub-division of dwellings and states that sub-division will be considered where it does not detract from the character of the property, adjoining properties and the amenities of the area while Objective BH13 allows for a relaxation of open space requirements on a case-by-case basis when retaining older buildings.
- 7.6.6. I note the open space situated at the rear of the site is currently divided into two areas of private open space to serve unit nos. 1 and 2 and comprises a total of 411m² with a narrow passage accessing the public open space situated along the eastern side of the private open space. This arrangement does not, in my opinion, represent best practice in terms of creating open, overlooked and safe areas of public open space.
- 7.6.7. I also note and agree with the further information request to remove previously proposed balconies on the rear elevation as their proposed layout and design and materiality represented poor quality architecture detracting from the character of the building in my view.
- 7.6.8. Having regard to the totality of the information presented and the facts of the case including the scale and layout of the existing open space to the rear of the site, as well as another open space area serving unit no. 2 situated to the east of the building, I consider the patios do not positively contribute to the architectural amenity of the area and I further consider the proposed landscaping and visual screening

- around each patio would reduce ground floor passive surveillance potential to the car park.
- 7.6.9. In my view there is sufficient space at the rear and side of the manor house to accommodate private open space for each of the 6no. units. This could enable removal of the patios on the front elevation and thus eliminate unnecessary additions detracting from the front elevation while ensuring each unit has an appropriate allocation of open space maintaining a high degree of residential amenity. Direct access may not be achievable from each unit to their respective open space area in such an arrangement however I consider this layout would result in a positive improvement to the visual and architectural amenity of the site as well as providing an opportunity to revise the boundaries between private and public open space in this location to enhance the quality of the public spaces. This may go some way to addressing alleged anti-social behaviour in the public open space as stated in the third-party submissions.
- 7.6.10. In concluding the matter of the patios, I recommend that retention permission is refused due to impacts to the character and setting of the host structure and having regard to the availability of alternative layouts which would provide ample private open space to each unit without compromising the front façade of the historical structure.

#### 7.7. Bin Storage

- 7.7.1. A 10m² detached bin store is proposed to be situated within the car park area with hedgerow screening on two sides. It would be 1.8m in height and finished with hardwood timber cladding on a steel frame.
- 7.7.2. The appeal suggests its location at the front of the site would not comply with Sections 4.8 and 4.9 of the CDP as it would detract from the visual amenity of the area as well as constituting a traffic hazard due to its location adjacent to the car park entrance. It goes on to suggest that bin storage should be situated to the rear of the site.
- 7.7.3. Section 4.8 of the CDP refers to 'Specific Housing Needs' for certain sectors of the population while Section 4.9 refers to 'Housing in the Open Countryside'. It is

- therefore unclear what sections of the CDP the development allegedly does not comply with.
- 7.7.4. Section 8.8.2 of the CDP refers to waste storage for houses and apartments and states that it should be 'externally located, concealed/ covered and adequate to cater for the size and number of bins normally allocated to a household. For terraced houses the most appropriate area for bins to be stored is to the front of the house, which should be located in well-designed enclosures that do not to detract from visual amenity or give rise to an accessibility hazard.'
- 7.7.5. In my opinion the proposed bin store is adequate and meets the requirements of Section 8.8.2. It would be screened from view from the majority of residents in the wider estate and would not be directly visible against the front elevation of the manor house. The proposed finishes are acceptable in my view and I also do not think it likely that it would cause a traffic hazard having regard to the number of vehicular movements in and out of the car park, the provision of a turning head, the location of the bin store set back from the entrance and the long distance sightlines achievable. I consider the nature of the car park with 8no. spaces set to the front of the manor house within an enclosed space with only one vehicular access point forms a homezone where lower speeds are experienced further mitigating against any potential traffic hazard.
- 7.7.6. In conclusion, I consider the design and location of the proposed bin store to be acceptable.

#### 7.8. Traffic Impact

- 7.8.1. The appeal suggests a Traffic Management Plan should be prepared in accordance with the Roads Department of the Local Authority and I note the applicant's response that a condition be attached requiring its submission to the Local Authority.
- 7.8.2. In my opinion, the scale of vehicular traffic associated with the development is unlikely to result in significant traffic generation affecting junction capacity in the area or creating a hazard for vulnerable road users, particularly when only 8no. car parking spaces are proposed, there is a bus stop situated 550m from the site and the site is also situated 900m from the train station.

- 7.8.3. I note that the original Roads Department report recommended a refusal of permission but that the Case Planner sought further information to address those items. I agree with the conclusions drawn in the second Case Planner's report which considered the further information response was sufficient to address the reasons for refusal. I also note that a second Roads Department report was sought but not received.
- 7.8.4. In this context, I consider the proposed development is not likely to cause a traffic hazard and that a Traffic Management Plan is not required having regard to the scale and nature of the proposed development as well as the location and context of the site.

## 8.0 AA Screening

- 8.1.1. I have considered the proposed development in light of the requirements S177U of the Planning and Development Act 2000 as amended.
- 8.1.2. The site is situated 175m south of the Slaney River Valley Special Area of Conservation (SAC) and 210m south of the Wexford Harbour Special Protection Area (SPA).
- 8.1.3. The proposed development seeks to retain 6no. apartments within an existing large, historic dwelling.
- 8.1.4. Having considered the nature, scale and location of the project, I am satisfied that it can be eliminated from further assessment because it could not have any effect on a European Site.
- 8.1.5. The reason for this conclusion is as follows:
  - The building refurbishment nature and modest scale of the works,
  - The location of the site removed from any waterbodies and lack of any hydrological connectivity,
  - Connection to existing public water services and
  - Taking into account the screening report/determination by Wexford County Council.

#### 8.2. Conclusion

- 8.2.1. I conclude, on the basis of objective information, that the proposed development would not have a likely significant effect on any European Site either alone or in combination with other plans or projects.
- 8.2.2. Likely significant effects are excluded and therefore Appropriate Assessment (under Section 177V of the Planning and Development Act 2000) is not required.

#### 9.0 Water Framework Directive

#### 9.1. Screening

- 9.1.1. The subject site is located 180m southwest of the River Slaney estuary with the Irish Sea and Wexford Harbour.
- 9.1.2. The proposed development seeks to retain 6no. apartments within an existing former dwelling.
- 9.1.3. No water deterioration concerns were raised in the planning appeal.
- 9.1.4. I have assessed the proposed development and have considered the objectives as set out in Article 4 of the Water Framework Directive which seek to protect and, where necessary, restore surface & ground water waterbodies in order to reach good status (meaning both good chemical and good ecological status), and to prevent deterioration. Having considered the nature, scale and location of the project, I am satisfied that it can be eliminated from further assessment because there is no conceivable risk to any surface and/or groundwater water bodies either qualitatively or quantitatively.
- 9.1.5. The reason for this conclusion is as follows:
  - The building refurbishment nature and modest scale of the works.
  - The location of the site removed from any waterbodies and lack of any hydrological connectivity.
  - Connection to existing public water services.

#### 9.2. Conclusion

9.2.1. I conclude that on the basis of objective information, that the proposed development will not result in a risk of deterioration on any water body (rivers, lakes, groundwaters, transitional and coastal) either qualitatively or quantitatively or on a temporary or permanent basis or otherwise jeopardise any water body in reaching its WFD objectives and consequently can be excluded from further assessment.

#### 10.0 Recommendation

I recommend that retention permission is refused for the reasons outlined below:

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, and to the established pattern, scale and architectural character of the area, it is considered that the development to be retained, including the patios and ESB meter gossip wall to the front of the building, would detract from the architectural character of the building and would not comply with Objective BH01 of the Wexford County Development Plan 2022-2028 which seeks to protect the architectural heritage of County Wexford. The modifications are obtrusive and overbearing and do not represent a high-quality architectural response to the sensitive site and therefore also do not comply with Section 3.5 of the Development Management Manual of the Wexford County Development Plan 2022-2028. The proposed development 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.

Sarah O'Mahony Planning Inspector

24th September 2025

## Form 1 - EIA Pre-Screening

| Case Reference  | 322874-25   |  |  |
|---|---|--|--|
| Proposed Development<br>Summary   | Retain subdivision of dwelling to 6no. apartments and all associated works including new patios and partition wall to the front elevation as well as proposed works including car parking, landscaping, bin and bike storage. |  |  |
| Development Address   | Strandfield Manor House, Strandfield, Townparks, Co. Wexford.   |  |  |
|   | In all cases check box /or leave blank  |  |  |
| 1. Does the proposed development come within the definition of a 'project' for the  |   |  |  |
| purposes of EIA?  | ☐ No, No further action required.   |  |  |
| <ul> <li>(For the purposes of the Directive, "Project" means: <ul> <li>The execution of construction works or of other installations or schemes,</li> </ul> </li> <li>Other interventions in the natural surroundings and landscape including those involving the extraction of mineral resources)</li> </ul> | for CLASS appointed in Port 1. Schodule 5 of the Diamina  |  |  |
| 2. Is the proposed development of a CLASS specified in Part 1, Schedule 5 of the Planning and Development Regulations 2001 (as amended)?  |   |  |  |
| ☐ Yes, it is a Class specified in Part 1.   | State the Class here  |  |  |
| EIA is mandatory. No Screening required. EIAR to be requested. Discuss with ADP.  |   |  |  |
| ☑ No, it is not a Class specified in Part 1. Proceed to Q3  |   |  |  |
| 3. Is the proposed development of a CLASS specified in Part 2, Schedule 5, Planning and Development Regulations 2001 (as amended) OR a prescribed type of proposed road development under Article 8 of Roads Regulations 1994, AND does it meet/exceed the thresholds?  |   |  |  |

| Class Specified in Part 2, Schedule 5 or a prescribed type of proposed road development under Article 8 of the Roads Regulations, 1994.  No Screening required.   |   |  |  |
|---|---|--|--|
| ☐ Yes, the proposed development is of a Class and meets/exceeds the threshold.  EIA is Mandatory. No Screening Required   |   |  |  |
| <ul> <li>Yes, the proposed development is of a Class but is subthreshold.</li> <li>Preliminary examination required. (Form 2)</li> <li>OR</li> <li>If Schedule 7A information submitted proceed to Q4. (Form 3 Required)</li> </ul>   | Class 10 (b)(i) Construction of more than 500 dwelling units.  The proposal comprises 6no. units in an existing building. |  |  |
| 4. Has Schedule 7A information been submitted AND is the development a Class of Development for the purposes of the EIA Directive (as identified in Q3)?  Yes □ Screening Determination required (Complete Form 3)  No ☒ Pre-screening determination conclusion remains as above (Q1 to Q3) |   |  |  |

#### Form 2 - EIA Preliminary Examination

# This preliminary examination should be read with, and in the light of, the rest of the Inspector's Report attached herewith.

## Characteristics of proposed development

(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).

The urban site is serviced and its size is larger than surrounding plots, however the development comprises a building refurbishment proposal and not a new build structure.

A short-term construction phase would be required to finish the works and the development would not require the use of substantial natural resources, or give rise to significant risk of pollution or nuisance due to its scale. The development, by virtue of its type and nature, does not pose a risk of major accident and/or disaster, or is vulnerable to climate change. Its operation presents no significant risks to human health.

The size and scale of the proposed development is not significantly or exceptionally different to the existing building or developments in the area due the lack of any additional building footprint.

## Location of development

(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, landscapes, sites of historic, cultural or archaeological significance).

The subject site is not located in or immediately adjacent to ecological, archaeological or culturally sensitive sites.

The building on the site has some architectural and historical merit, and is recorded on the NIAH but has no statutory designations. The proposed works will not significantly alter the existing structure.

It is considered that, having regard to the limited nature and scale of the development, there is no real likelihood of significant effect on other significant environmental sensitivities in the area.

It is not likely to have any cumulative impacts or significant cumulative impacts with other existing or permitted projects.

## 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

The size of the proposed development is notably below the mandatory thresholds in respect of a Class 10 Infrastructure Projects of the Planning and Development Regulations 2001 as amended and no significant impacts are predicted due to the scale of the development.

Localised construction impacts will be temporary. The proposed development would not give rise to waste,

| effects and opportun mitigation).                        | ities for  | pollution or nuisances beyond what would normally be deemed acceptable.   |  |
|--|------------|---|--|
|  |            | Having regard to the nature of the proposed development and works constituting development within an urban area, likely limited magnitude and spatial extent of effects, and absence of in combination effects, there is no potential for significant effects on the environmental factors listed in section 171A of the Act.  Conclusion |  |
| Likelihood of Significant   Conclusion in respect of EIA |            |   |  |
| Effects  | 0011010010 | THI TOOPCOL OF LIA  |  |
| There is no real   | •          |   |  |
| likelihood of significant                                |            |   |  |
| effects on the environment.                              |            |   |  |

| Inspector: | Date: |
|------------|-------|
| mopeotor.  | Date. |