

STATEMENT OF RESPONSE TO AN BORD PLEANÁLA'S CONSULTATION OPINION



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IN RESPECT OF A
PROPOSED RESIDENTIAL DEVELOPMENT
GOREY, CO. WEXFORD

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1.0 INTRODUCTION

1.1 The pre-application consultation opinion from An Bord Pleanála in relation to the proposed strategic housing development at Ballowen/Ramsfort Park, Gorey, Co. Wexford was received on the 8th of June 2018 (case reference no. ABP-301472-18).

1.2 The opinion states that An Bord Pleanála “has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development.”

1.3 The opinion further states that “An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development”. The issues listed are under the following headings:

- Urban Design and Layout;
- Connectivity and Permeability;
- Public Open Space;
- Wastewater Infrastructure;
- Surface Water Management and Risk of Flooding.

1.4 Section 2 of this report sets out how the applicant has responded to each of the issues raised by the Board in their Consultation Opinion, with particular reference to The Design Statement, and accompanying reports and drawings prepared by the design team and which accompany this application. This Statement of Response, and the associated amendments to the scheme, in turn responds to the key issues raised by the Planning Authority’s opinion as set out in their Report on the pre-application proposals and the Board’s Opinion.

1.5 Article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017 states:

‘(5) At the conclusion of a pre-application consultation, the Board may do either or both of the following: (b) notify the prospective applicant that specified information should be submitted with any application for permission for the proposed development, including photographs, plans, maps, drawings or other material or particulars and, where the Board considers it appropriate, either or both—’.

1.6 The pre-application consultation opinion from An Bord Pleanála states pursuant to Article 285(5)(b) that the following specific information should be submitted with any application for permission:

- *A report identifying the demand for school places likely to be generated by the proposal and the capacity of existing schools in the vicinity to cater for such demand.*
- *Having regard to the difference in levels across the site, details of existing and proposed changes in contours/levels across the site. Photomontage images and cross-sections at appropriate intervals to illustrate the topography of the site, showing proposed dwellings, access roads including the proposed ‘avenue’ road and public open space areas.*
- *Details of undergrounding or re-routing of any overhead ESB power lines or existing underground services located within the site.*

- *A site layout plan indicating pedestrian and cycle connections through the development lands to existing and proposed transport modes in the vicinity. Connections from the residential lands north of the site through the subject site should also be indicated.*
- *Details of the full extent of ‘cut and fill’ activities proposed. Such details should also provide for inter alia, excavation methods to be used on site particular having regard to the brownfield nature of part of the lands, volumes of soil to be excavated/extracted, re-used and/or removed off site, associated traffic movements to and from the site. Such details should be included in the Environmental Impact Assessment Report.*

- *A construction and demolition waste management plan should be provided.*

- *A phasing plan for the proposed development should be provided which provides for a commensurate level of functional public open space within each phase. The phasing arrangement should provide for attenuation proposals which are independent of each subsequent phase.*

- *Landscaping proposals including an overall landscaping masterplan for the development site including the public open space. Details pertaining to the quantity, type and location of all proposed hard and soft landscaping including boundary treatments should be submitted.*

- *A site layout plan which clearly indicates what areas are to be taken in charge by the Local Authority.*

1.7 A detailed response to each of the points raised above has been provided within this response report and has been included as part of the planning application documentation.

Figure 1.1 – Overall Masterplan



2.0 STATEMENT OF RESPONSE TO ISSUES RAISED

2.1 The following sets out how the applicant has addressed the four issues raised in the Board's Notice of Pre-Application Consultation Opinion, with reference to the accompanying documentation submitted, to ensure the subject application constitutes a reasonable basis for an application for strategic housing development.

2.1.1 Summary of the alterations to the layout

2.1 In response to the Board's opinion the design of the overall scheme has undergone a number of alterations which has further enhanced the design:

- The main 'avenue' (as identified under the hierarchy of streets in the Gorey Town & Environs Local Area Plan 2017-2023) has been substantially revised in its treatment to clarify and strengthen its role and identity.
- Allowance for a vehicular connection through to the open space area to the south of the site, as a continuation of the main 'avenue'.
- Amendment to orientation of Apartment buildings to provide a stronger street frontage, and avoidance of blank gable walls.
- The layout and design of the apartments have been substantially revised throughout the development. Each individual site has been re-planned, with the buildings moved to the street edge/urban block corner to lend clarity and definition to the streetscape and urban realm, as well as appropriately sheltering the communal open spaces.
- Provision of additional permeability through the inclusion of pedestrian and cyclist and vehicular linkages to the north and to the south.
- Inclusion of brick in the facades of buildings, in place of render, to provide a robust finish.
- Site Layout has been revised to allow for a second vehicular and pedestrian/cyclist connection through to the residential lands to the north of the site, giving three connections in total.
- Overlooking of public open space is improved, through the re-orientation of Apartment buildings.
- An indicative masterplan for the adjacent Community & Education zoned lands is included, which reflects the applicant's development intentions and also a layout that will be supportive of the high-quality urban realm that is envisaged for the residential lands within the current application.

2.2 The Site Layout Plan (Pr-010 and figure 1.1) prepared by Strutec Architects shows the overall layout in context.

2.2 Response to Item 1 – Urban Design and Layout

2.3 Item 1 of the An Bord Pleanála opinion states the following:

“Further consideration of documents as they relate to the urban design and layout of the proposed development having regard to the provisions of the 'Sustainable Residential Development in Urban Areas, Guidelines for Planning Authorities' and, in particular the need for new residential developments to create high quality places which, inter alia, present an attractive, well-maintained appearance with a distinct sense of place and a quality public realm that is easily maintained. The development strategy and/or vision for the 'avenue' and its function within the development and its interface with the public open space and community and educational zoned lands should be further considered. The provision of an indicative master-plan for the community and educational lands should be considered so as to provide a context for the development strategy of the residential lands

in question. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted.”

2.4 In relation to Issue No.1 referred to in the pre-application consultation opinion from An Bord Pleanála, further consideration has been given to the layout of the proposed development.

2.5 We believe the design and layout of the proposed development, as amended, provides a strong identity and sense of place, following best practice principles promoted in the Urban Design Manual 2009.

2.6 The following pages provide a more detailed description, of how the development meets the principles outlined in the Urban Design Manual regarding Neighbourhood, Site and Home, which all contribute to the development's character and identity.

2.7 The design and layout has evolved, retaining the important natural features of the subject lands, providing contemporary high- quality homes respectful of the scale and form of neighbouring housing, linking future pedestrian routes, prioritising cycling use and forming safe vehicular entrances.

2.2.1 Urban Design Manual – A Best Practice Guide (2009)

2.8 The Design Manual sets out a series of 12 criteria which it recommends should be used in the assessment of planning applications and appeals. The 12 no. criteria are assessed as follows:

Context: How does the development respond to its surroundings?

2.9 The layout of the proposed dwellings link the proposed streets and spaces through the architectural design and overall landscaping of the development. The development provides for suitable separation distances to adjoining development and provides appropriate boundary treatments on site to protect the residential amenity and landscape character of the environs.

2.10 The proposed development forms a significant part of the Creagh Key Development Site identified in the Gorey Town & Environs Local Area Plan 2017-2023. As such, it is seen as reflecting the natural evolution of the neighbourhood from low density outer suburban residential to a more structured and sustainable urban edge. The development of the Community & Education zoned lands will also give the opportunity to enhance the amenities of the area and surrounding developments, thus contributing to their collective viability as a neighbourhood in its own right. The density of the proposed development is appropriate to its context and respects that of the emerging area, while being sensitive to existing adjacent lower density precincts.

2.11 The existing topography and sylvan character informs the form, architecture and landscaping of the scheme, reinforcing the character and identity of the neighbourhood. The boundaries reflect adjacent activities, with open green areas connecting to existing adjacent spaces (e.g. Ramsfortpark to the east), while private rear gardens protect adjacent existing gardens.

Connections: How well is the new neighbourhood / site connected?

2.12 In response to the Board's Opinion, additional permeability has been provided to the residential zoned lands to the north and also to the open space area to the south. It is noted that based on the Gorey Town & Environs Local Area Plan 2017-2023, the development is highly connected to its environs on all edges and in a number of ways. These links provide safe access particularly for pedestrians, but also for cyclists and (where appropriate and in a controlled manner) for vehicles.

- 2.13 Firstly, the southern edge connects through its green space to the existing open space in the residential development of Ashwood Grove / Willow Park. A strong pedestrian and cycle connection is also planned here, to align with the new main avenue.
- 2.14 The northern boundary allows for pedestrian, cycle (3 no. links) and vehicular links (2 no.) to the future adjacent development, as indicated in the Gorey Town & Environs Local Area Plan 2017-2023.
- 2.15 The eastern boundary is shared with Ramsfortpark Forest and the central landscape space in the development is aligned on a pedestrian and cyclist access to this important amenity.
- 2.16 The main vehicular access is from the Fort Road, which forms the western boundary. A cycle link is provided along the southern boundary (of the CE zoned lands) It is also proposed to carry a footpath along the Fort Road, immediately bounding the development (to the south of the main entrance). The footpath/cyclepath then continues to the north internally and will be continued to the boundary to the north, to facilitate future connections. Additional permeability will be provided to the south through the incorporation of a vehicular link, which can facilitate future access, through the Council owned lands to the south.
- 2.17 With regard to public transport, the layout can accommodate a bus service, to allow for future connections to the town centre. The layout will facilitate access from Fort Road with a bus stop to be located in or adjacent to the Community & Education zoned lands.

Inclusivity: How easily can people use and access the development?

- 2.18 A very broad range of new homes is proposed. These range from two bedroom to five bedroom houses, in terraced, semi and detached arrangements. Generously-sized apartments/duplexes are proposed in two and three bedroom configurations, Wexford County Council having indicated that one bedroom and studio apartments are not appropriate in this location. There is a mix of house types throughout the development, with the apartments/duplexes also evenly distributed, as they form the urban block corners.

Table 2.1 – Overall Residential Development Mix

	2 bedroom	3 bedroom	4 bedroom	5 bedroom	
Apartments	36	29			65
Houses	26	125	77	4	232
	62	154	77	4	297
	20.9%	51.9%	25.9%	1.3%	100.0%

Source: Strutec Architects Schedule of Areas

- 2.19 Mixed tenure will include social housing under Part V as well as houses for owner occupation. At least 10% of the units will conform fully to Lifetime Home (LTH) standards, to ensure long-term adaptability and inclusivity.
- 2.20 The layout provides for universal access, with a variety of spaces for the use of residents of all ages and stages. Open spaces are well defined and contribute to sense of place in themselves and as parts of the wider development. The development and its open spaces will provide a positive aspect from the adjacent existing and future residential areas, as well as from Fort Road.

Variety: How does the development promote a good mix of activities?

- 2.21 The proposed development includes for a substantial amount of usable open space which will cater for a wide range of population. In addition a creche of c. 554 sq. m with a play area of c. 966 sq. m is also provided.
- 2.22 In accordance with the zoning and detailed provisions of the Gorey Town & Environs Local Area Plan 2017-2023, the provision of new activities other than residential usage would not be indicated or appropriate within the application site lands. However, the Community & Education zoned lands within the applicant’s ownership offer the opportunity to include a range of complementary uses and activities to service the development and surrounding residential areas. Additionally, the proposed mix of housing type and tenure will add to the choice of home available in the area and as designed the buildings will present a tenure blind development. Both Part V and private apartments are proposed in the same buildings, while Part V housing will be indistinguishable from private housing.

Efficiency: How does the development make appropriate use of resources, including land?

- 2.23 The net density of the site, at 37 units/ha derives from a highly efficient layout in this edge of town location, where the market demand is largely for traditional housing, thus validating the urban block strategy. The landscaped areas give focal points to the layout, providing amenity and biodiversity within the scheme, with SUDS incorporated into these spaces.
- 2.24 Buildings and spaces are arranged to exploit good solar orientation. Houses with north south orientations are generally larger, have south facing private open space or feature dual aspect rooms at ground floor level, allowing south light to enter from either the front or rear. The apartment/duplex buildings are designed with living areas and private balconies generally facing south, south west or south east. The majority of houses have independent rear garden access facilitating the storage of bins, while mid-terrace houses have screened storage for three bins at the front of the house.

Distinctiveness: How do the proposals create a sense of place?

- 2.25 The location of the site adjacent to Ramsfortpark Forest immediately creates the potential for distinctiveness in the development, together with the views back over the town provided by the sloping topography. These factors have been built upon in two particular ways, based on the layout indicated in the Gorey Town & Environs Local Area Plan 2017-2023:

1. The central Neighbourhood Park links the Fort Road with access to Ramsfortpark Forest, while also connecting the northern and southern areas of the site and the Community & Education zoned lands.
2. The dominant direction of the new streets, including the main avenue, is north–south, thus making the most of the primary views to the south. Furthermore, the Community & Education zoned lands give the opportunity to provide facilities to be shared by the surrounding new and existing residential developments, which lends distinctiveness both within the application site and the neighbourhood. Finally, the highly structured layout provides a new edge for the town, which also serves to terminate the recently established Creagh Avenue.

Layout: How does the proposal create people-friendly streets and spaces?

- 2.26 The layout closely follows that set out in the Gorey Town & Environs Local Area Plan 2017- 2023 and provides active frontages and passive surveillance throughout the site. Urban blocks form the basis, without dead ends or cul de sacs, thus encouraging ease of movement and permeability, especially for pedestrians and cyclists.

2.27 A clear hierarchy of streets is reflected in the development, with a main 'spine' avenue running north-south and connecting to the adjacent sites (pedestrian & cycle access only to the south). The dwellings facing this avenue edge it with an appropriate scale and treatment. The subsidiary streets adopt a shared surface low speed strategy, to provide an appropriate environment

2.28 Blank gables are avoided by employing the specifically designed apartments/duplexes to form the block corners and by using, in some locations, house types that turn the corner with entrance doors or glazing on the gable side of the terrace. As well as forming clear streets, houses are also arranged around the green spaces to ensure activity and overlooking and thus safety for users. Streets are generally shared surface areas to calm traffic and create distinct spaces

Public Realm: How safe, secure and enjoyable are the public areas?

2.29 Public and private spaces within the site are designed to create a legible layout for residents and visitors alike, as well as according with the layout and zoning indicated in the Gorey Town & Environs Local Area Plan 2017-2023. The public areas benefit from extensive natural surveillance from surrounding dwellings and passers-by. Semi-private zones at the front of houses define the edge of the public realm, and provide a buffer to the houses from the public space. These zones are landscaped to define the curtilage of each house and accommodate parking. This encourages residents to take ownership of their immediate surroundings and will help to keep these areas maintained. The shared surface finishes and detailing of materials make the roads and parking spaces integral elements of the landscaping scheme.

2.30 A formal play area for children is located in the main Neighbourhood Park open space which defines the central axis of the development, visually and physically linking Fort Road with Ramsfortpark Forest. Two further areas of local open space are allowed for; the southern open space acts as a pedestrian link with Gorey town and a gateway space to the development. The design language of this space is more formal as befits an entranceway to the development. The northern open space is a smaller local space for adjacent units and incorporates natural play elements, to accommodate an element of young children closer to home.

2.31 The public and private realms are clear, and streets are considered an integral part of the place and of the spatial experience.

Adaptability: How will the buildings cope with change?

2.32 There is a very good range of dwelling types in the proposal. Houses are adaptable in various ways and can be expanded into the roof for bedrooms, or into the back garden for additional living area. A ground floor extension could also allow for an additional bedroom for any wishing to adapt their home. At least 10% of the units will conform fully to LTH standards, to ensure long-term adaptability.

2.33 All dwellings, houses and apartments/duplexes, are designed to be energy efficient, with external walls sized to anticipate NZEB standards.

Privacy / Amenity: How do the buildings provide a high quality amenity?

2.34 All dwellings have access to usable private outdoor space meeting Development Plan standards. Houses have private rear gardens while the apartments have balconies that are sited such that they do not interfere with adjoining units.

2.35 All houses and 100% of the apartments/duplexes in the scheme are dual aspect or greater. Dwellings are designed to accommodate appropriate acoustic insulation and by their layouts to prevent sound transmission. Windows are located and sized appropriately to avoid views into the home from other houses and from the street. Landscaped parking curtilages at the front of houses

offer a privacy buffer from the public realm, and ground floor apartments are set back from the footpath within their own communal realm. For houses, windows are generally larger onto private gardens than they are onto the street and for ground floor apartments larger window and balconies to living areas look onto the landscaped communal area.

2.36 Adequate and usable internal storage is provided to all dwellings. Most houses have direct access to rear gardens for bin storage, while mid-terrace units have screened areas to the front for storing bins. Apartments/duplexes are in small blocks of either two or three units and are set back from the street within their own communal realm. This includes shared bin storage and bicycle parking.

Parking: How will the parking be secure and attractive?

2.37 Parking for houses are generally provided to the front of each house within its curtilage, and as such, is always close to the dwelling entrance and in view from the house. Parking for the apartments/duplexes is on-street but well overlooked and immediately adjacent. On-street parking areas will be landscaped and designed to avoid long stretches of relentless parking. Secure and sheltered bicycle parking to serve the apartments/duplexes is also provided.

Detailed Design: How well thought through is the building and landscape design?

2.38 The proposed materials, comprising a mix of smooth render and brick, allow for variety in the scheme, while aiding orientation and providing visual interest. External wall finishes will combine with landscaping finishes in semi-private and public areas to present an integrated scheme that will make a positive contribution to the locality. Good quality durable materials proposed for the buildings and public realm, along with the layout design, will facilitate easy and regular maintenance, while parking spaces will appear integrated into the overall scheme. A particular feature of the design is the mix of unit types throughout the layout, which ensures visual variety and a distinct character to each block and street.

2.39 Bin stores to mid terraced units have been carefully designed to sit inconspicuously into scheme. The landscape design is integrated with the use of the public spaces and movement through the site. Parking, streets and movement are all considered together in how the scheme is used.

2.3 Response to Item 2 – Connectivity and Permeability

2.2 Item no. 2 of the An Bord Pleanála opinion states:-

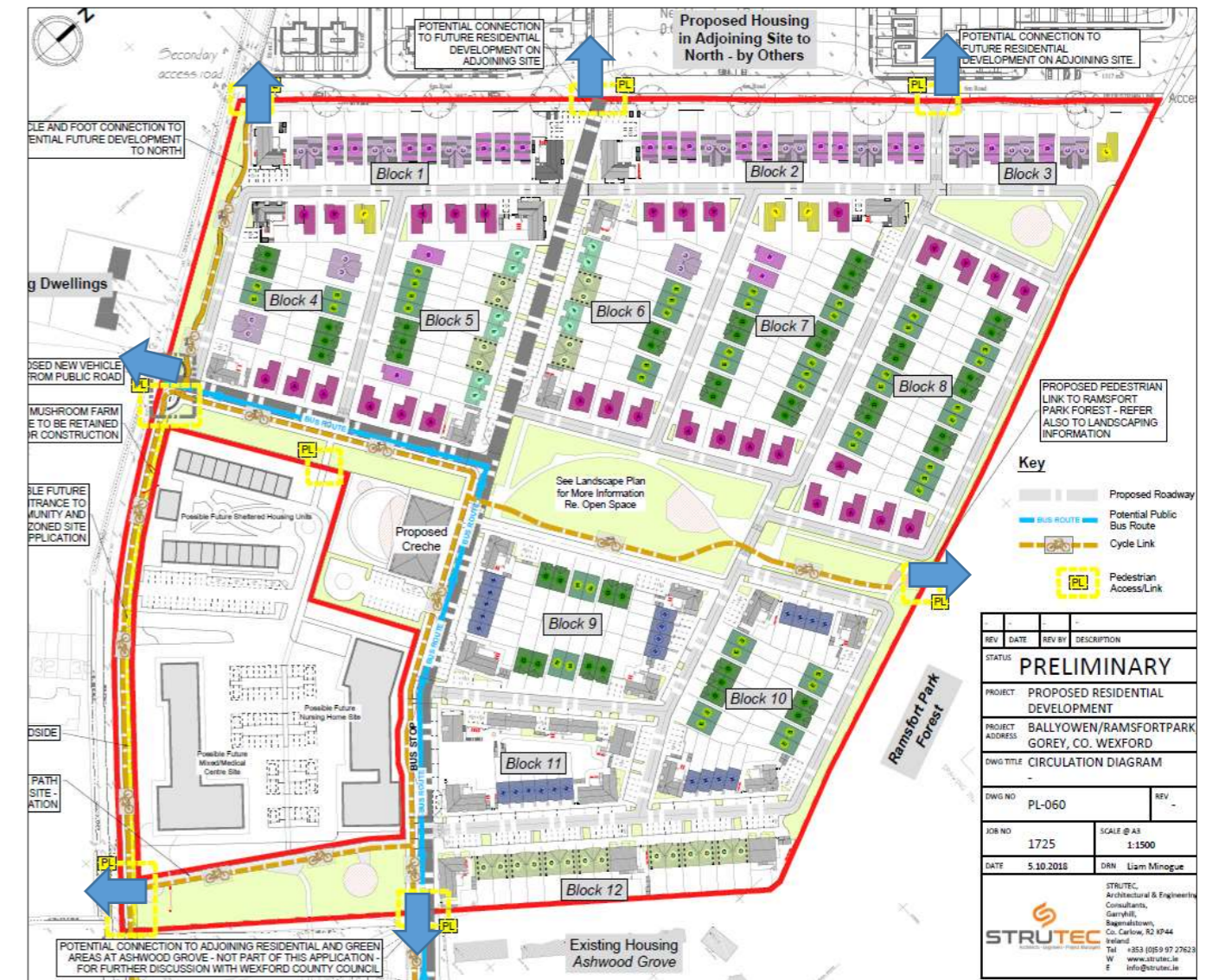
“Further consideration/clarification of the documents as they relate to the provision of connections (vehicular and pedestrian/cyclists) through the site in particular to the residential lands north of the site and the public open space lands to the south of the development site. Consideration should be given to the proposed layout of the residential scheme to the south adjacent to the open space lands and the potential for a vehicular access at this location in the future. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted.”

2.3 In relation to item no. 2 referred to above, the scheme has been amended by the Design Team. The proposal now includes the provision of an additional vehicular and cyclist connection, located in the north eastern portion of the subject land to the residential zoned lands to the north. In addition, the proposed layout now includes a cyclist/pedestrian connection, located immediately within the western boundary, which will be built up to the northern boundary. This will allow for future connections to the lands to the north. Our client and design team have been in contact with the adjoining landowner and have discussed the proposals, including the boundary treatment along the northern boundary (and a letter of consent is enclosed).

2.4 Drawing PL-060, prepared by Strutec Architects shows the pedestrian, cyclist and vehicular permeability through the site.

2.5 The permeability of the southern boundary has been improved and now includes vehicular and cyclist access (cyclist access previously proposed). The open space has been designed to integrate with the existing open space to the south, and an indicative layout of the adjoining open space lands is provided. These works, located outside the application boundary, would be undertaken by the Council.

Figure 2.1 – Connectivity and Permeability



Source: Strutec Architects Site Layout Drawing PL-060

2.4 Response to Item 3 – Open Space

2.6 Item no. 3 of the An Bord Pleanála opinion states:-

“Further consideration/clarification of documents as they relate to the functionality and quantum of open space proposed and the distribution of and connections to public open space areas. Consideration should also be given to the passive surveillance and level changes across the public open space areas. The further consideration of this issue may require an amendment to the documents and/or design proposals submitted.”

2.4.1 The functionality and quantum of the active open space on the site

2.7 The landscaping proposals have been formulated having careful regard to the recreational needs of the future residents of the proposed development. The materials and planting specified in the scheme are also such as to minimise the amount of maintenance required which ensures a durable landscaping scheme.

This current proposal delivers high quality open space, with a variety of hard and soft landscaped areas providing for both passive and active recreation for all ages.

2.8 The location layout and usability of the proposed public open spaces are of the highest quality and will contribute positively to the residential amenity of future residents. The open space provision for the entire scheme was carefully considered by the design team, and it is submitted the detailing and high quality finish as illustrated on the Landscape Masterplan (drawing no. 1706_PL_P_01), prepared by Murray Associates, Landscape Architects, confirms a high degree of amenity for future residents of the scheme.

2.9 The design intent is to create a high quality and appropriate landscape for future residents, which will meet their recreational needs and provide an attractive visual setting and social amenity space. The principles of inclusivity for all age groups, universal accessibility and sustainable development are applied to ensure an inclusive and environmentally responsible design solution.

Figure 2.2 – Central open space (part)



2.10 The public open space has been designed and located so as to complement residential layout and should be visually as well as functionally accessible to the maximum number of dwellings within the housing area. The approach is to ensure that the open space provision is located within easy walking distance of dwellings.

2.11 All of the proposed open space areas have been designed to be generous in width to make them usable and have been integrated at an early stage of the design process so as to avoid residual areas with little or no function. The design team has ensured that there are a series of open space areas which are functionally accessible to the maximum number of dwellings within the new residential area.

2.12 The landscape proposals are also in accordance with the objectives of Green Infrastructure and Open Space policies in the current Wexford County Development Plan. Within the Gorey Town and Environs Local Area Plan 2017-2023, the Creagh Neighbourhood Framework Plan (Appendix 1, Pg 11) shows development approaches and objectives that have been adhered to within the Landscape Masterplan.

2.13 The Council will generally require that useable public open space shall be generally be provided at a rate of around 1 hectare per 150 dwellings or 10% of the site area (whichever is the greater) but the Council may accept or require a lower or greater provision depending on the location and characteristics of the site, the overall design quality of the development and open space proposed, and the availability or otherwise of existing open space provision nearby.

2.14 We would also highlight that the subject lands are in close proximity of the circa 60ha Town Park to the south (185 metres) and Ramsfort Park Forest immediately adjacent to the east. Both of these open spaces are considered Hub Open Spaces (Gorey Local Area Plan 2017-2023, page 55). These are the highest level of open space within the environs of Gorey and are intended as destination spaces for all residents of the town. The Town Park is currently undergoing a €1,200,000 revamp contributing to the creation of a high quality public park and recreational area, while Ramsfort Park Forest (in consultation with Coillte and local groups) will potentially be developed into an amenity area with associated trails for pedestrians and cyclists. There will be a direct pedestrian linkage with Ramsfort Park Forest from the neighbourhood park within the development and 2km of new pedestrian walkways now provided.

2.15 Financial contributions for community use may be accepted where open space provision below the normal requirement is considered.

2.16 With reference to the delivery of neighbourhood parks, the Gorey LAP notes that *“In general, a total of 15% public open space will be required for residential schemes and this shall include the zoned Neighbourhood Parks as identified in the open space strategy. This open space must be developed in tandem with the residential scheme.”*

2.17 The proposed development provides approximately 15% of Public Open Space within the development, which includes the zoned neighbourhood park as identified in the open space strategy, which is considered appropriate having regard to the context of the subject site and substantial adjoining public spaces outlined above. The landscape plans also show how the lands could integrate with the Council open space area to the south, as part of separate works to be undertaken by the Local Authority, which would, if implemented provide further enhanced open space to the under-utilised area, which currently exists.

2.18 There are three areas of open space identified for passive recreation within the development, totalling 1.41 hectares. This mosaic of open spaces gives every resident easy and convenient access to recreational amenity, and allows distinct landscape treatments and elements to be applied to different spaces. This aids wayfinding and contributes towards giving the development a recognisable character. The Neighbourhood Park element of the development sits at the centre

of the site, a maximum of 210 metres from the furthest housing unit. This is 8,896 square metres, or 9.1% of the developable area. The remaining local areas spaces to both north and south cumulatively account for 4,960 square metres, or 5.4% of the developable site area.

2.19 Within all open spaces there are areas for informal play, casual recreation and passive leisure. The quality of these spaces is enhanced by the inclusion of features such as natural play elements, seating, paths, native planting and landform, and the utilisation of environmentally appropriate materials. The palette of materials will also be used to integrate the proposed architectural forms and materials within the landscape.

Communal Open Space

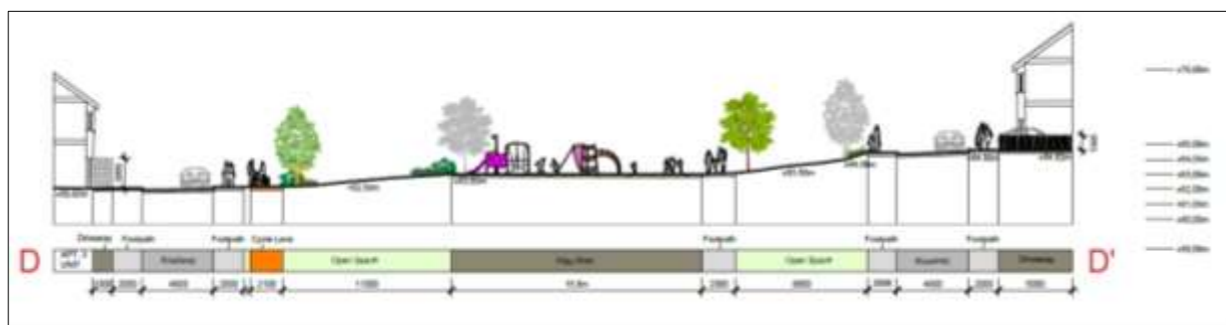
2.20 Within the apartment blocks there is an allowance of semi-private communal open space for use by the residents of the block. The quantum of space for each apartment is in accordance with the DoHPLG Planning Guidelines for Design Standards for New Apartments.

2.4.2 Passive Surveillance of Open Spaces

2.21 With regard to the passive surveillance of open spaces, the design provides for substantial overlooking of open spaces within the scheme design. The objective of the design team has been for dwellings to address the greens (pocket parks) and neighbourhood parks as much as possible. This over-arching design principle will ensure that there is a high degree of passive surveillance throughout the proposed development, providing a safe and secure environment for future residents and visitors to the area, using all the attractive green spaces throughout the scheme.

2.22 It is also noted that the design of the development includes apartment buildings located on the corners of the residential blocks which provide additional presence and overlooking of the opens space areas.

Figure 2.3 – Section through central open space



Source: Murray Associates

2.23 With reference to the boundaries, Overall, there will be an increase of approximately 316 metres of native hedgerow on the boundary with Ramsfort Park Forest, with a further 521 linear metres being rehabilitated and enhanced (both the western boundary with Fort Road and the northern boundary adjacent to the neighbouring development site). Therefore, there is a total of 837 linear metres of native hedgerow associated with the development. Across the site there will also be approximately 340 no. new native and non-native trees planted.

Hedgerows - Northern

2.24 The existing hedgerow boundary in this location (387 linear metres) consists of a few unmanaged native species (Hawthorn, Holly and Gorse) with large areas overgrown with Bramble, Ivy and Bracken. Elsewhere, large gaps are present in the fabric of the hedge.

2.25 Proposals for the existing hedgerow allow for the rehabilitation of this boundary. The existing bramble and ivy will be cleared, with new native hedgerow species planted to fill in the gaps evident in the existing hedgerow.

2.26 Although the 7 no. trees are required to be removed, the existing hedgerow will remain intact. The 7no. existing trees along the northern boundary will be replaced by 26no. semi-mature native trees (Lime - *Tilia x europaea*, 30-35cm girth).

Hedgerows – Eastern

2.27 This portion of the site is adjacent to the existing Coilte-owned Ramsfort Park Forest. The existing boundary vegetation of juvenile oak trees will not be effected by the proposed development. The boundary treatment proposed is a wire mesh fencing with steel pole supports.

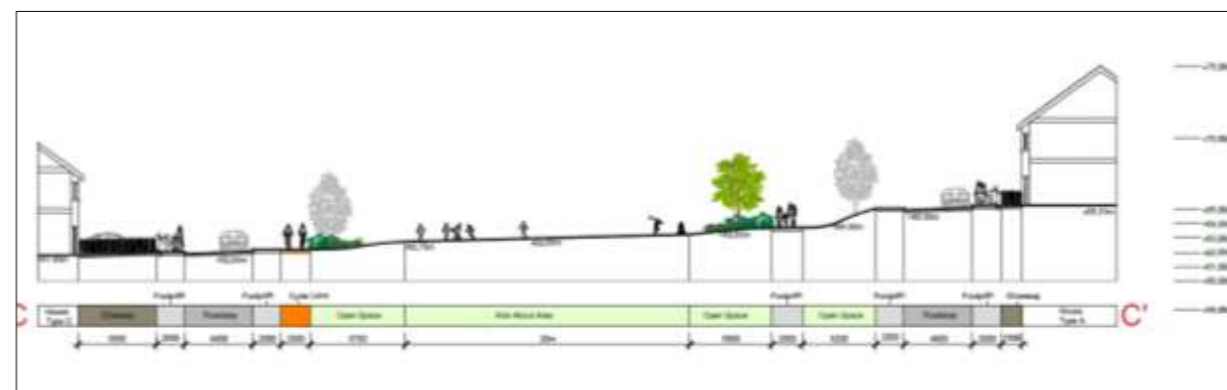
Hedgerows – Western

2.28 Along the western boundary with Fort Road it is proposed to retain, where possible, the existing specimen trees (Ash, Oak and Beech). 15no. trees will be removed due to the development roadway and cycleway. Many of these existing trees are of fair to poor quality. This current hedgerow will be rehabilitated by removing the Bramble (*Rubus sp.*) and Ivy (*Hedera sp.*) and reinforcing the existing hedgerow planting of Hawthorn (*Crataegus monogyna*) with mixed native hedgerow underplanting.

Hedgerows – Southern

2.29 The existing Leyland Cypress (*Cupressus x leylandii*) planting to the south of the site, adjacent to the north of Ashwood Grove, is proposed to be removed to allow for the development. There will be a solid boundary wall of 2 metres in height between the dwellings on Ashwood Grove and the proposed rear gardens of the development in this area.

Figure 2.4 – Section through central open space



Source: Murray Associates

2.30 It is submitted that the open spaces are suitably proportioned and overlooked by surrounding homes to ensure that these amenities are safe to use. The open space areas are gently sloped c. 62MOD to 64MOD, with the main change in levels accommodated in the northern portion of the open space area.

Figure 2.5 – Connections through open space and to adjacent open space areas



2.31 The intention of the design is to:-

- Develop an integrated pedestrian movement and cycle network that allows for secure and easy movement throughout the subject lands.
- Design high quality public open spaces that focus on creating a '*sense of place*' and individual character for the development area.
- Facilitate the creation of usable and high quality public open space.
- Provide a 'Green Streets' approach that allows for street trees and planting that form a buffer between pedestrians and traffic.

2.5 Response to Item 4 – Wastewater Infrastructure

2.32 Item no. 4 of the An Bord Pleanála opinion states:-

“Further consideration/clarification of the documents as they relate to the required extension in the wastewater infrastructural network to serve the proposed development. The prospective applicant is advised to liaise with Irish Water with regard to the nature of works required to address any proposed extension/upgrade to the network to facilitate the development, whether planning permission is required for such works and likely timing for securing such permissions where required. The documentation at application stage should provide details with regard to the network extensions including layout and design details and the timelines involved relative to the construction and completion of the proposed development.”

2.33 In response to the above item, we refer the Board to the Statement of Design Acceptance (Customer Reference No. 8042651993) dated the 6th of February 2019 which is enclosed with the SHD application.

2.34 The enclosed Infrastructure report prepared by IE Consulting which confirms that Irish Water and the Wexford County Council have been consulted extensively. As a result the ‘red line’ boundary for the proposed SHD application has been expanded to include the lands required for the construction of the foul pipe located outside the applicant’s ownership. The proposed foul pipe infrastructure required to facilitate this Strategic Housing Development shall therefore be constructed as part of the overall development infrastructure. A letter of consent dated the 6th of November 2018 from Wexford County Council is included with the application.

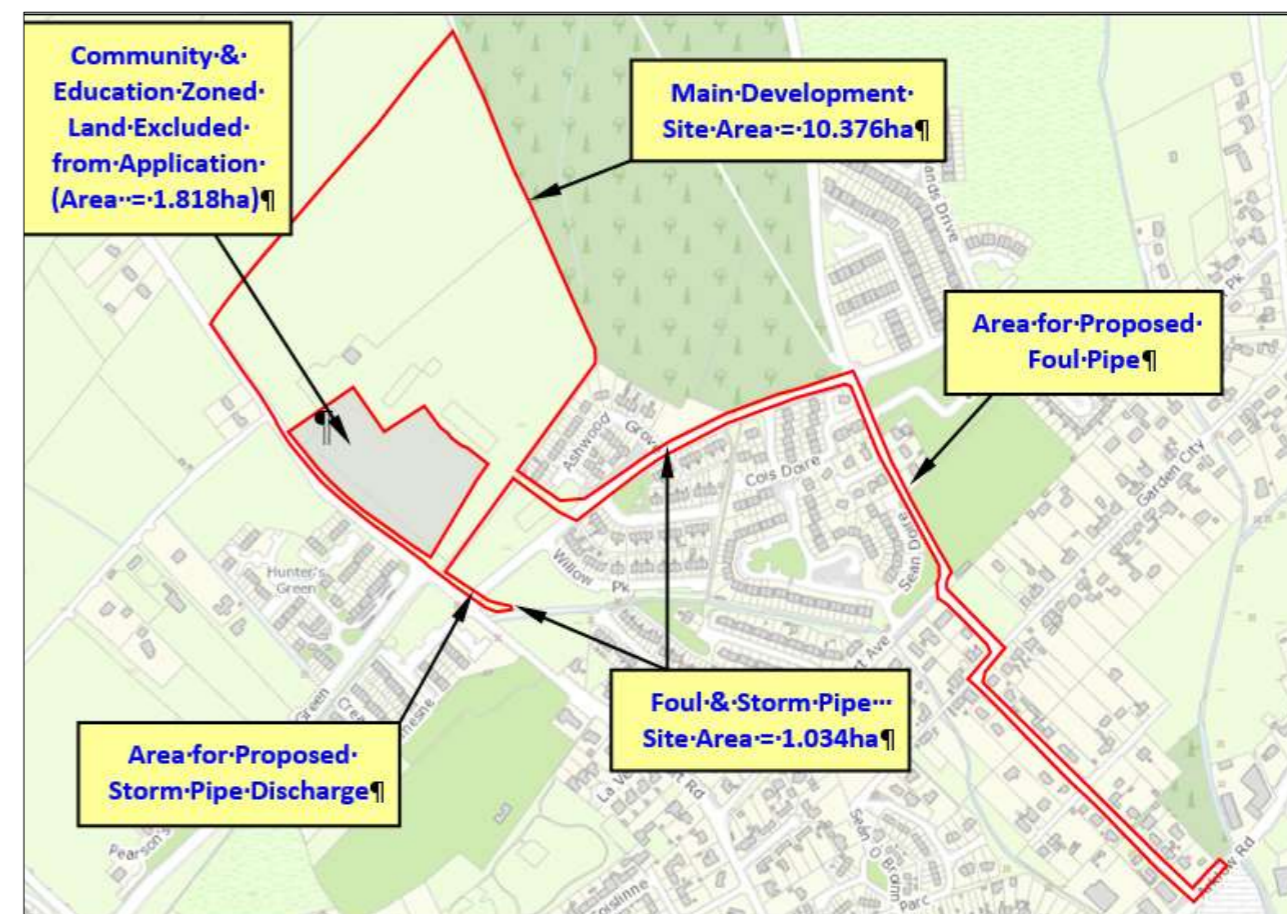
2.35 The proposed foul water sewer layout is shown on Drawing Numbers IE1505-001-C to IE1505-006-C. It is proposed to drain all dwellings including the possible future development of the area zoned for ‘Community and Education’ within the site via a sewer located within the proposed roads and pavements and discharge to an existing 525mm diameter Irish Water sewer located approximately 1km south of the site boundary on the Arklow Road (R772) and opposite the Lidl supermarket.

2.36 The proposed foul pipe route has been altered following consultation with Inland Fisheries Ireland, who was concerned that there would be high potential for the discharge of deleterious matter during these works to the Ballyowen Stream.

2.37 The proposed pipe route is located with the public road for the majority of the route. There is one section which traverses an area of open space which is in the ownership of Wexford County Council.

2.38 The EIAR submitted with the application includes an assessment of the proposed route of the foul sewer.

Figure 2.6 – Agreed Route for Wastewater Infrastructure



Source: IE Consulting Engineering Report

2.6 Response to Item 5 – Surface Water Management and Risk of Flooding

2.39 Item 5 of the An Bord Pleanála opinion states the following:

“Further consideration of documents as they relate to the potential for increased risk of flooding in the wider area having particular regard to the potential for displaced waters due to any infrastructural network upgrade works required to facilitate the development. Any surface water management proposals should be considered in tandem with any Flood Risk Assessment, which should in turn accord with the requirements of ‘The Planning System and Flood Risk Management Guidelines’ (including the associated ‘Technical Appendices’). Further consideration of these issues may require an amendment to the documents and/or design proposals submitted. The prospective applicant is advised to liaise with the planning authority regarding surface/storm water proposals prior to making an application.”

2.40 In relation to Issue No.5 referred to in the pre-application consultation opinion from An Bord Pleanála, further consideration has been given to the design of the route for the wastewater infrastructure.

2.41 Firstly, it should be noted that all development buildings are in low risk Flood Zone C as defined by The Planning system & Flood Risk Management Guidelines for Planning Authorities. The development does not impact on flood plain areas or storage or downstream properties. All proposed development types are appropriate and suitable for their location and existing flood risk.

2.42 We refer the Board to the Site Specific Flood Risk Assessment, prepared by IE Consulting Engineers. In particular it is noted the proposed storm and foul infrastructure upgrades located outside the applicant’s lands have been incorporated into the Site Specific Flood Risk Assessment. In addition, the potential hydrological impact of the surface water management proposals for the site has also been considered as part of that assessment report. The design proposals have been amended to take account of the potential impact of flood risk on the foul infrastructure proposed.

2.43 IE The planning authority has been consulted in relation to the surface water proposals for the site. They have confirmed that they are satisfied with the surface water management proposals.

2.44 According to the IE Consulting the proposed foul pipe will also be constructed under an existing bridge that crosses the Ballyowen Stream, which is approximately 800m from the main development site area. It is proposed to construct the pipe a minimum of 0.6m below the bed of the stream and so there is no impact of the foul pipe on the hydraulic capacity of the bridge. IE Consulting outline that the OPW and the local authority have been consulted in relation to any potential future flood alleviation works that may be carried out on the stream such as lowering the stream bed levels, which may result in the proposed foul pipe reducing the capacity of the bridge in the future. The OPW have stated that they do not have a maintenance remit for this section of the Ballyowen Stream and therefore it would be for the planning authority to confirm whether consent is required. Wexford County Council has confirmed that there are no plans to widen or deepen the stream in this location at present or in the future. Wexford County Council has also confirmed that if the OPW are satisfied then consent under Section 47 or Section 50 of the Arterial Drainage Act (1945) is not required.

2.45 The SSFRA, prepared by IE Consulting concludes that

“it is proposed to construct the proposed foul manholes with sealed flood proof covers within the two flood risk areas. This will ensure that the foul waters are not susceptible to inundation from fluvial flooding and therefore ensure there is no spillage from the proposed foul water network due to fluvial flood waters entering the piped system. The proposed development is considered to comply with the requirements of the Justification Test for development management. Overall, the

flood risk to the proposed development site is LOW. In consideration of this analysis, development of the site is not expected to result in an adverse impact to the hydrological regime of the area or to increase flood risk elsewhere and is therefore considered to be appropriate from a flood risk perspective.”

3.0 STATEMENT OF RESPONSE TO SPECIFIC INFORMATION REQUIRED

3.1 The following sets out how the applicant has addressed the Board's request for additional information in respect of the proposed development.

3.1 Item no. 1 – School Demand Report

3.2 Item no. 1 seeks:-

“A report identifying the demand for school places likely to be generated by the proposal and the capacity of existing schools in the vicinity to cater for such demand.”

3.3 In response to the above we refer the Board to the enclosed School Demand Report, prepared by John Spain Associates.

3.4 In relation to primary school requirements, taking the methodology approach set out within the Department of Education and Skills Code of Practice, it can be concluded that there will be 1,453 children of primary school-going age at 2023. The capacity in local school is estimated at 1,935. It can be seen that there is significant capacity within existing primary schools in Gorey to meet planned demand up to 2023 and there is thus no requirement to deliver any additional primary school sites.

3.5 With reference to secondary schools that there is also significant capacity (c. 2,576) in the existing secondary schools within Gorey, far in excess of the 8.5% of population (1,029) which is assumed by the Department to be of secondary school-going age.

3.6 We also refer the Board to the correspondence in Appendix 1 (of the JSA Schools report) which details consultations between our client and the Department of Education and Skills towards the end of 2017 which confirms that there is sufficient Primary School capacity and that the subject lands were not suitable for a Secondary School, and that they do not require the C&E lands for a school.

3.7 Having regard to the above it is respectfully submitted that there is sufficient capacity in existing schools in the area to facilitate the proposed development.

3.2 Item no. 2 – Photomontages and Cross-sections

3.8 Item no. 2 seeks:

“Having regard to the difference in levels across the site, details of existing and proposed changes in contours/levels across the site. Photomontage images and cross-sections at appropriate intervals to illustrate the topography of the site, showing proposed dwellings, access roads including the proposed 'avenue' road and public open space areas.”

3.9 In response to the above we refer the Board to the enclosed photomontages prepared by Modelworks which show the main open spaces and the Avenue. In addition we refer the Board to the cross sections prepared by Murray Associates, (outlined ab) and the site sections and elevations prepared by Strutec Architects.

Drawing no. 1725-PR-020-Site Sections

Drawing no. 1725-PR-021-Site Elevations

Drawing no. 1725-PR-022-Site Sections

Drawing no. 1725-PR-023-Site Sections

Drawing no. 1725-PR-024-Site Sections

Drawing no. 1725-PR-025 -Site Elevations

3.3 Item no. 3 – Details of ESB Services or underground services

3.10 Item no. 3 seeks:

“Details of undergrounding or re-routing of any overhead ESB power lines or existing underground services located within the site.”

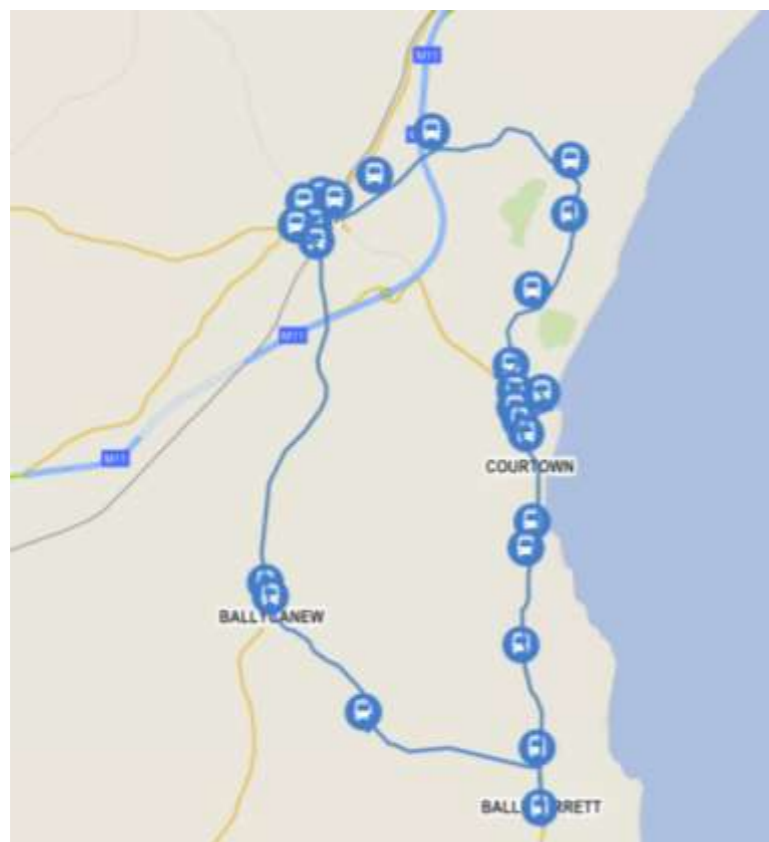
3.11 In response to this item we refer the Board to the Outline Construction Environmental Management Plan prepared by Strutec Architectural and Engineering Consultants, which states that immediately after access to the site is established and made secure, the site compound will be installed. Pre-existing site services related to the previously existing mushroom sheds need to be checked and decommissioned (if required) in conjunction with the ESB, together with the provision of temporary builder's power & water supplies. All services will be terminated at the boundary of the site prior to the works being undertaken.

3.4 Item no. 4 – Pedestrian and Cycle Connections

3.12 Item no. 4 seeks:

“A site layout plan indicating pedestrian and cycle connections through the development lands to existing and proposed transport modes in the vicinity. Connections from the residential lands north of the site through the subject site should also be indicated.”

3.13 In response to this item we refer the Board to drawing no. PL-060 prepared by Strutec Architects (see section 2.3 above), which shows the pedestrian and cycle connections through the development lands. The layout of the Avenue can accommodate a local bus route which currently operates in the area (no. 879), and which connects to the Gorey Railway station.

Figure 3.1 – 879 Bus Route (source: TFI)

3.14 Additional services (Bus Eireann) and private buses are located on the Main street to the south of the development linking the lands to Dublin City, Dublin Airport and Wexford town. Additional cyclist and pedestrian connections are provided to the residential lands to the north and also to the south.

3.5 Item no. 5 – ‘Cut and Fill’ Detail

3.15 Item no. 5 seeks:

“Details of the full extent of ‘cut and fill’ activities proposed. Such details should also provide for inter alia, excavation methods to be used on site particular having regard to the brownfield nature of part of the lands, volumes of soil to be excavated/extracted, re-used and/or removed off site, associated traffic movements to and from the site. Such details should be included in the Environmental Impact Assessment Report.”

3.16 In response to this item we refer the Board to the enclosed Construction and Waste Management report prepared by IE Consulting. Appendix C of the IE report includes cut and fill detail (prepared by Strutech Engineers).

3.17 Appendix D of the IE report provides an excavation plan for the site.

3.18 The objectives of the Excavation Plan are as follows:-

1. Propose soil site investigations and laboratory soil analyses to determine the suitability for soil re-use and waste disposal;

2. Set out a soil analyses schedule of soil samples;
3. Set out an outline plan and positioning of proposed site investigations point;
4. Set out the proposed schedule of assessment and interpretation of the soil analyses;

3.19 With reference to Brownfield Lands, the IE Excavation plan outlines that

“Prior to the development of the site, it is proposed to undertake shallow site investigations in the area of the former Walsh Mushrooms Factory area of the site. These lands were previously developed upon and may contain some residual impacted or contaminated soils due to the former site usage. The potential risk of soil contamination associated with Mushroom farming is considered to be low. None the less, it is proposed to carry out sufficient on-site investigations and environmental sampling to scientifically assess the potential environmental risk associated with the future use of the in-situ soil. Sampling of in-situ soils on-site shall be completed by trial pitting. It is proposed that approximately ten (10 No.) trial pits shall be excavated and sampled to a maximum depth of one metre from the ground surface across the proposed ‘brownfield’ cut fill area. Approximately five of these investigation points could be sampled at sufficient depths greater than one metre to obtain representative soil samples from the proposed site drainage excavations.”

3.20 Section 2 of the Excavation Plan provides detail on the excavation methodology, which includes:-

- A Health and Safety Plan shall be developed by the sampler to illustrate that sampling will be completed in accordance with the Safety Health and Welfare at Work (Construction Regulations 2013 (SI No. 291 of 2013) and the Safety Health and Welfare at Work (Exposure to Asbestos) (amendment) 2010 (S.I No. 589 of 2010).
- The site investigations and sampling methodology employed by the site investigations crew will be carried out in general accordance with relevant standards to enable representative samples to be obtained from the site investigation. Best practice should be followed when planning the site investigation and detection of sampling locations.
- Representative soil samples should be obtained based on the proposed cut and fill plan. All sampling equipment, hand tools, and handling gloves should be decontaminated or disposed of prior to re-use or further sampling.

3.21 A full methodology is included in the Excavation Plan.

3.22 According to the IE report, Soil which is not re-used will be disposed of to an appropriate permitted site. The Cut and Fill Report has outlined that there will be a net requirement of 11,712.71 m³ of fill to be imported into the site.

3.23 An estimated 3,0291.76 m³ of soil will require excavation on-site, and the entire volume of this material will be re-used on-site.

3.24 The report outlines that in the unlikely event of evidence of soil contamination being found during work on site, the appropriate remediation measures will be employed. Any work of this nature would be carried out in consultation with, and with the approval of the Environmental Protection Agency and the Environmental Department of Wexford City Council.

3.6 Item no. 6 – Construction and Demolition Waste Management Plan

3.25 Item no. 6 seeks:

“A construction and demolition waste management plan should be provided.”

3.26 In response to this item we refer the Board to the enclosed Construction and Environmental Management Plan prepared by Strutec Engineers, which includes detail in relation to an Outline Construction Environmental Management Plan for the works required to construct the residential development proposed for lands at Creagh, Gorey, Co Wexford. It contains a description of these works, together with proposals as to how they will be managed, as well as incorporating the Preliminary Construction Management Traffic Plan. In addition, we refer the Board to the enclosed Construction and Waste Management report prepared by IE Consulting.

3.27 The southern/south-western part of the site has an exposed steel frame and concrete hardstandings that remain from the previously existing mushroom sheds that occupied that section of the site. Any demolitions will be carried out by a competent Demolition Subcontractor in accordance with the current code for demolition and the consulting engineer’s specification’. It is anticipated that the vast majority of the waste generated from demolitions will be segregated wherever possible for reuse or recycling in accordance with the relevant legislation and guidelines and the project’s Construction Waste Management Plan.

3.28 The methodology in relation to the brownfield element of the subject lands is set out in the Excavation Report, prepared by IE Consulting.

3.7 Item no. 7 – Phasing – Open Space

3.29 Item no. 7 seeks:

“A phasing plan for the proposed development should be provided which provides for a commensurate level of functional public open space within each phase. The phasing arrangement should provide for attenuation proposals which are independent of each subsequent phase.”

3.30 In response to this item it is noted that the central areas of open space will be delivered in the first phase of development. We refer the Board to the Strutec Architects drawing PL-030 which shows 5 no. phases in total. The applicant is seeking a 10 year permission, to allow for sufficient time and flexibility to deliver the dwellings having regard to the nature of the development and its location, and anticipated timeframe for delivery of units.

3.31 In addition, the IE Consulting confirm that the attenuation will be provided in tandem with the delivery of the development. The main area of attenuation is contained within the central area of open space which will be constructed in Phase 1. The second area of attenuation is located in the southern area of open space (adjacent to the southern boundary).

3.32 The proposed order of construction of key elements is as follows, however this is subject to detailed review by the Contractors at construction stage and specifics may require adjustment once the contractor has been appointed:-

- Phase 1 (approximately 72 dwellings)
 - Form site access
 - Connect incoming water supply, electrical & comms
 - Construct required foul sewer outfall outside the site
 - Partial construction of main avenue
 - Construct main central landscape open space

- Phase 2 (approximately 77 dwellings)
 - Construction of crèche/childcare facility (required for 75 dwellings or more)
- Phase 3 (approximately 43 dwellings)
- Phase 4 (approximately 38 dwellings)
 - Construct southwestern open space
- Phase 5 (approximately 67 dwellings)
 - Complete main avenue



3.8 Item no. 8 – Landscape Masterplan

3.33 Item no. 8 seeks:

“Landscaping proposals including an overall landscaping masterplan for the development site including the public open space. Details pertaining to the quantity, type and location of all proposed hard and soft landscaping including boundary treatments should be submitted.”

3.34 In response to this item we refer the Board to the enclosed Landscape Masterplan (1706_PL_P_01) and Design Statement prepared by Murray Associates. Drawing no. 1706_PL_DD_01 prepared by Murray Associates sets out the boundary detail, the location of which is shown on the landscape Masterplan. Section 2.4 above and the Landscape Design Statement outlines the quantity, type and location of the hard and soft landscaping.

Hard and Soft Landscaping

3.35 The Landscape Design Report outlines that a simple palette of hard landscape materials is proposed. External spaces are designed to minimise hazards or impediments to access or movement and will be void of steps or pronounced level changes. Hard landscape surfaces are chosen for slip resistance and to be free draining. Public footpaths are to be brushed concrete, with pre-cast concrete kerbs. Private driveways are to be permeable concrete block paving, while rear terraces are to be concrete flag paving. Site furniture is simple yet robust, with all proposed landscape lighting to utilise LED lamps.

3.9 Item no. 9 – Taking in Charge

3.36 Item no. 9 seeks:-

“A site layout plan which clearly indicates what areas are to be taken in charge by the Local Authority.”

3.37 In response to this item we refer the Board to the enclosed drawing prepared by Strutec Architects (PL-070) which shows the areas to be taken in charge by the Planning Authority.

Figure 3.2 – Taking in Charge



Source: Strutec Architects Site Layout Drawing PL-070

4.0 CONCLUSIONS

4.1 This document outlines how the items outlined in the pre-application consultation opinion from An Bord Pleanála in relation to the proposed residential development at Fort Road, Ballown, Ramsfortpark, Gorey have been addressed in full by the applicant and design team prior to lodgement of the application to An Bord Pleanála.

4.2 The document also addresses the specific information requested by An Bord Pleanála and identifies the source or location of the response within the planning submission documentation.

4.3 The relevant prescribed authorities identified in the pre-application consultation opinion from An Bord Pleanála have also been notified of the submission of the planning application in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

4.4 The layout and design changes incorporated into the final scheme will result in improvements to the overall design and layout and will a sustainable approach to the development of these lands. It is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with all relevant national, regional and local planning policies and guidelines.