



STATEMENT OF CONSISTENCY

An Bord Pleanála

(following notice under Section 6(7)(b) of the Planning and
Development (Housing) and Residential Tenancies Act 2016)

CARCUR PARK, WEXFORD Strategic Housing Development

Submitted on behalf of William Neville & Sons

August 2020

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The Proposed Development

1.1 Proposed Development

A site of this importance, scale and prominence requires a strategic and plan led approach in the interest of establishing a comprehensive and realistic long-term solution to all potential issues. As such a Masterplan has been prepared by Reddy Architecture + Urbanism for the entire landholding which gives guidance and direction to all future development of the subject lands. The Masterplan identifies the constraints associated with the site particularly regarding the adjacent Natura sites, the potential for flooding, and planning policy/transport objectives. The Masterplan sets out parameters and guidance for the overall form of development over the entire site including an overall design concept, open space strategy, the principles governing the road network including the potential future third river crossing and delivery of aspects of the orbital inner relief road and the council's coastal walk objective.

The evolution of the Masterplan is clearly highlighted by the "Design and Access Statement" document prepared by Reddy Architecture + Urbanism which accompanies the subject planning application. The Design and Access Statement should be read in conjunction with the Environmental Impact Assessment Report (EIAR) also submitted with the subject application. A summary of the findings of the Design and Access Statement and EIAR are included in this Statement of Compliance only, in the interest of avoiding duplication.

In general terms, the proposed development consists of 413 residential units over 10 house types and 7 Apartment Blocks including 2 crèche facilities. In addition, a sequence of open spaces in the form of a large linear park along the river edge, a number of formal play areas throughout the site, a wild life corridor/protection zone in the form of an otter pond and incidental planted spaces scattered throughout the development, also form part of the proposal. The design approach has been developed to provide for a gateway experience to and from the town considering the future bridge crossing, through the provision of primary and secondary landmark buildings in addition to a strong mix and range of housing provision in the interest of creating a robust and sustainable community.

Table 1.1 gives a detailed breakdown of the proposed number of units and associated house types. In terms of the planning application, the proposed development is advertised as follows:

Permission is sought by William Neville and Sons for:

"A total of 413 residential units consisting of 175 houses (12 four bedroom detached houses + Garages, 20 four bedroom Semi-Detached houses, 2 four bedroom corner detached houses, 80 three bedroom Semi Detached Houses, 20 three bedroom terraced houses, 7 three bed end of terrace houses, 4 three bedroom corner houses, 20 two bedroom terraced houses, 6 two bedroom end of terrace, 4 Semi-Detached houses), 7 apartment blocks with a total of 238 Apartments: (Block One: (47 units over 5 floors: 40 two bed, 7 three bed), Block Two: (50 units over 7 floors: 4 one bed, 38 two bed, 8 three bed), Block Three: (45 units over 7 floors: 3 one bed, 34 two bed, 8 three bed), Block Four: (20 units over 4 floors: 1 one bed, 19 two bed), Block Five: (38 units over 5 floors: 1 one bed, 37 two bed,) Block Six: (19 units over 4 floors: 3 one bed, 15 two bed, 1 four bed) Block Seven: (19 units over 4 floors: 3 one bed, 15 two bed, 1 four bed)). Together with two crèche facilities (Crèche A: 346.4 sqm floor area. Crèche B 395.3sq.m floor area) and a retail unit of 86.3sq.m (located in Block 10). A total of 769 Car parking spaces (250 private parking spaces, 501 public spaces and 18 creche spaces). and all associated site works". The proposal shall be delivered over four phases of development. An EIAR (Environmental Impact Assessment Report), an NIAR (NATURA Impact Assessment Report) and a SSFRA (Site Specific Flood Risk Assessment) have been prepared as part of the planning application)

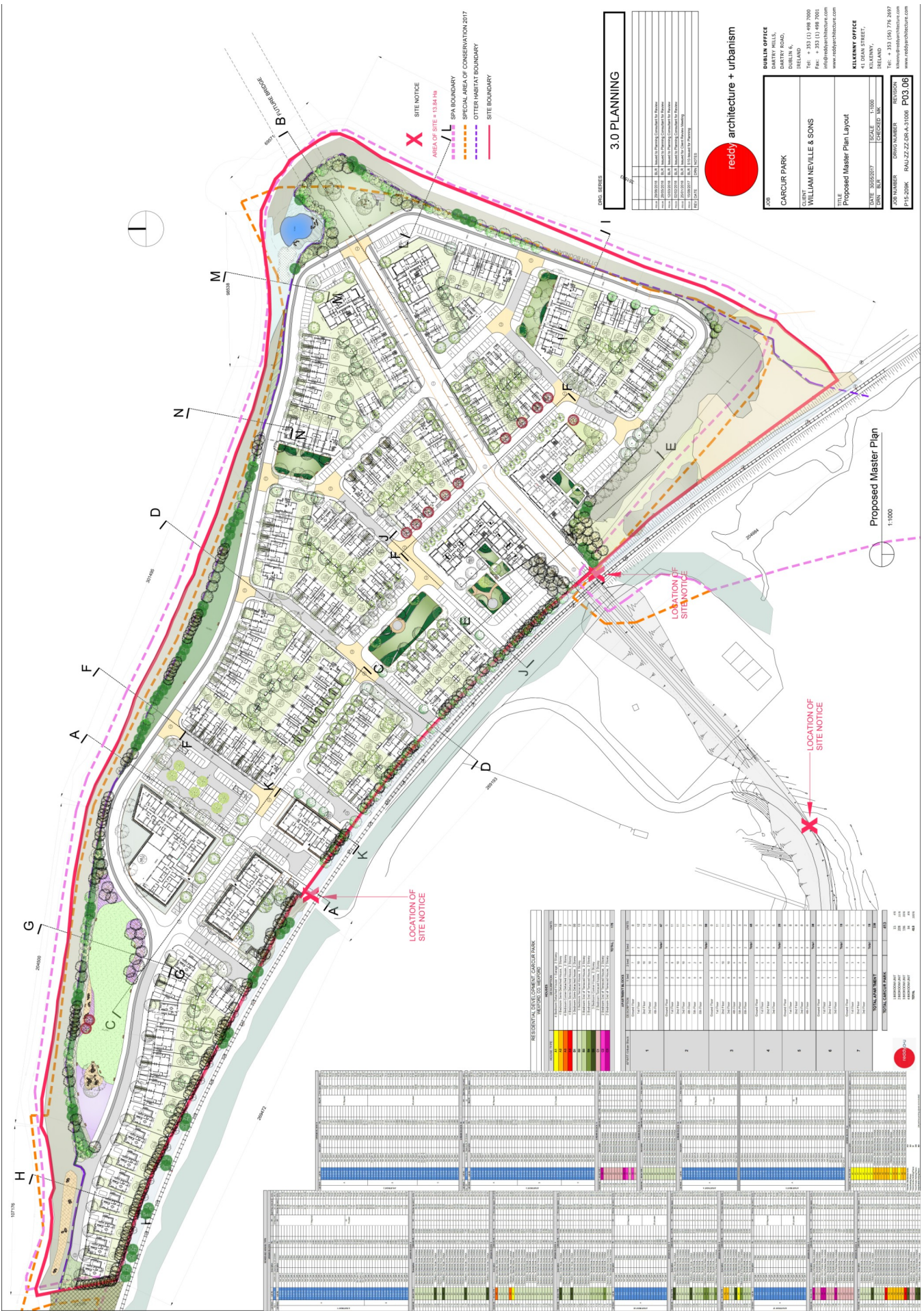




Table 1.1 Breakdown of Units Proposed

HOUSE TYPE	HOUSES			UNITS	
	DESCRIPTION	1 bed	2 bed		3 bed
A1	4 Bedroom Detached House, 4 Garage, 2 Storey	0	7	1	8
A2	4 Bedroom Semi-Detached House, 2 Storey	0	10	2	12
A3	4 Bedroom Corner Detached House, 2 Storey	0	10	2	12
A4	4 Bedroom Semi-Detached House, 2 Storey	0	10	2	12
B1	3 Bedroom Terrace House, 2 Storey	0	3	0	3
B2	3 Bedroom Terrace House, 2 Storey	0	3	0	3
B3	3 Bedroom Terrace House, 2 Storey	0	3	0	3
B4	3 Bedroom Terrace House, 2 Storey	0	3	0	3
B5	3 Bedroom Terrace House, 2 Storey	0	3	0	3
C1	2 Bedroom Terrace House, 2 Storey	2	3	0	5
C2	2 Bedroom Terrace House, 2 Storey	2	3	0	5
C3	2 Bedroom Terrace House, 2 Storey	2	3	0	5
TOTAL		175	47	20	228

APART/Urban Block	APARTMENT BLOCKS			UNITS	
	DESCRIPTION	1 bed	2 bed		3 bed
1	Ground Floor	0	7	1	8
	1st Floor	0	10	2	12
	2nd Floor	0	10	2	12
	3rd Floor	0	10	2	12
2	Ground Floor	0	3	0	3
	1st Floor	2	3	0	5
	2nd Floor	0	10	1	11
	3rd Floor	0	10	1	11
3	Ground Floor	0	5	2	7
	1st Floor	0	2	1	3
	2nd Floor	0	2	1	3
	3rd Floor	0	2	1	3
4	Ground Floor	0	0	0	0
	1st Floor	3	7	1	11
	2nd Floor	0	10	1	11
	3rd Floor	0	10	1	11
5	Ground Floor	0	5	2	7
	1st Floor	0	2	1	3
	2nd Floor	0	2	1	3
	3rd Floor	0	2	1	3
6	Ground Floor	1	4	0	5
	1st Floor	0	5	0	5
	2nd Floor	0	5	0	5
	3rd Floor	0	5	0	5
7	Ground Floor	1	7	0	8
	1st Floor	0	8	0	8
	2nd Floor	0	8	0	8
	3rd Floor	0	8	0	8
TOTAL APARTMENT		19	46	20	85

TYPE	LEVEL	GFA	UNITS	TOTAL GROUND FLOOR (m ²)	TOTAL GFA (m ²)
A1	GF	66.40	12	796.8	1560
	1ST	68.90			
A2	GF	68.30	18	1228.4	2390.4
	1ST	68.30			
A3	GF	73.80	2	151.6	276
	1ST	82.30			
A4	GF	82.30	2	136.6	265.6
	1ST	64.50			
B1	GF	53.00	80	4400	8384
	1ST	49.80			
B2	GF	64.00	13	832	1561.3
	1ST	56.10			
B3	GF	64.00	5	320	600.5
	1ST	56.10			
B4	GF	50.00	2	101.2	194
	1ST	46.60			
B5	GF	69.50	11	764.5	1348.6
	1ST	53.10			
C1	GF	41.60	22	915.2	1740.2
	1ST	37.50			
C2	GF	31.60	2	83.2	158.2
	1ST	31.60			
C3	GF	41.60	6	249.6	474.6
	1ST	37.50			
TOTAL			175	9980.1	18953.4

APT	UNITS	TOTAL GROUND FLOOR (m ²)	TOTAL GFA (m ²)
Apt.1	47	1219.30	5190.8
Apt.2	20	1421.90	5972.00
Apt.3	38	1437.30	5882.20
Apt.4	50	654.20	1832.30
Apt.5	45	715.90	3439.50
Apt.6	19	1437.30	4623.30
Apt.7	19	1437.30	4623.30
TOTAL		238	31463.40

SITE AREA (m²) **138400**
 RESIDENTIAL DENSITY **40_{DPH}**
 PLOT RATIO **0.51**
 SITE COVERAGE (m²) **13.08%**
 PUBLIC OPEN SPACE (m²) **39224**
 SHARED GREEN & BOULEVARD (m²) **36334**



TOTAL CARCUR PARK		413
1 BEDROOM UNIT	15	4%
2 BEDROOM UNIT	228	55%
3 BEDROOM UNIT	136	33%
4 BEDROOM UNIT	34	8%
TOTAL	413	100%

1.2 Site location

The subject site is located in Park, Carcur, which is west of Wexford town centre and located within the Wexford Town boundary. The site is bound to the north by the River Slaney which is a Natura 2000 site, to the southeast by the former Wexford Town Landfill site and to the south west by an extensive established area of playing fields/sports grounds. A railway line runs along the entire southern boundary of the site.



Fig 1.2 Site location

1.3 Site Description

The site is a former quarry and batching plant and as such is described as a “brownfield site”. All quarrying related activity ceased when the current owner purchased the site from Cement Roadstone Holding Ltd.

1.4 Context for the proposed development

The subject site formed part of a wider development area which was subject to an Action Area Plan (AAP) published in 2003 and prepared by Murray O Laoire Architects. The action plan was a joint venture between the then owners of the site Cement Roadstone Holding Ltd. and Wexford County Council and was incorporated and adopted into the Town Development Plan at the time. Many of the site specific objectives of the current Development Plan owe their origins to the key findings of the Murray O Laoire AAP including the zoning of the site, the objective for a third bridge crossing and the objective for the provision of an internal relief road (Objective T8).

The AAP included the adjoining playing fields to the South West and the former landfill to the Southeast of the site and envisaged upgrading of both to form a regional scale hierarchy of open space provision. The intention was that the remedial works required for the landfill would

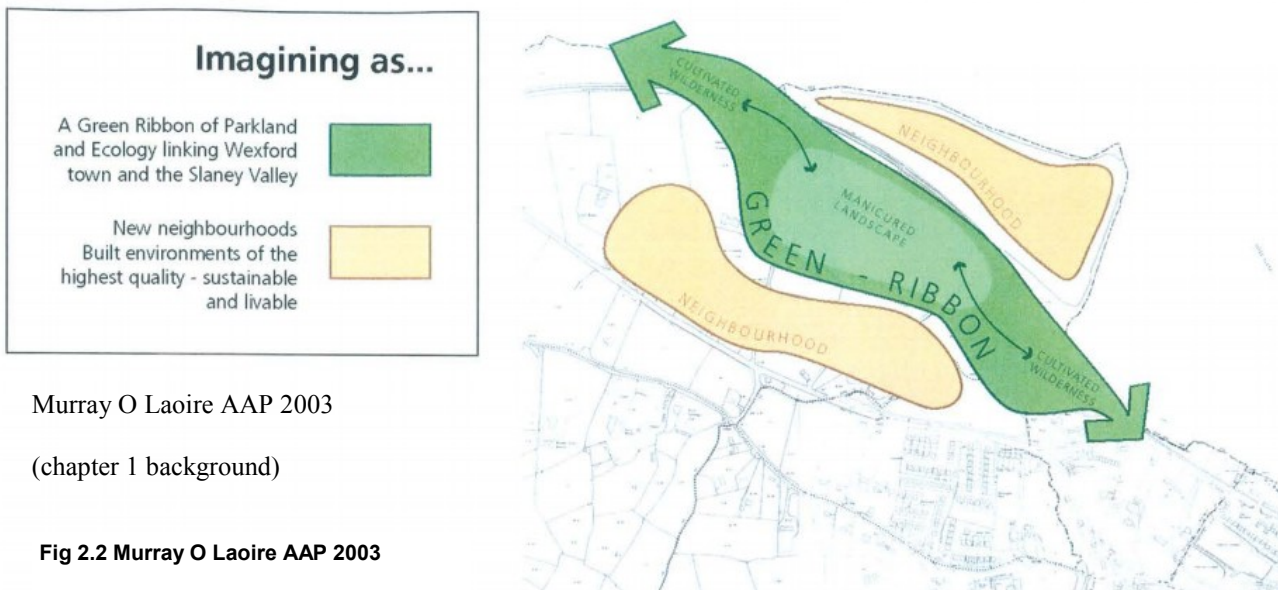
be tailored to form a town park which together with upgrades to the playing fields/sports/recreation fields would form a “Green Ribbon” flanked on both sides by residential development.

Cement Roadstone Holding Ltd. paid a significant financial contribution to the council for works required to transition the former dump to a park, as envisaged by the Development Plan and AAP as part of the sale of the subject site to William Neville & Sons. A legal agreement was also drawn up between the Council and William Neville & Sons as part of the sale for the provision of roads infrastructure (Objective T8) and associated bridge over the railway line to provide access to all lands subject to the AAP. Both the railway bridge and the roads infrastructure were approved via Part 8 agreement.

The infrastructural upgrades have been constructed and are in situ, save for the provision of the bridge over the railway line, and were carried out by the applicant. A financial contribution has been paid for upgrade works to the former landfill for the provision of a park/linear walk (by Cement Roadstone Holding Ltd). The proposed development represents the next step which is the realization of the residential element of the AAP and subsequent Development Plans.

2.5 Planning Context

As stated previously, the first site specific policy document relating to subject lands was undertaken in partnership by Murray O Laoire and Wexford County Council in 2003 prior to the present owner’s purchase of the site.



Murray O Laoire AAP 2003

(chapter 1 background)

Many of the development objectives pertaining to the site were first established by the Murray O Laoire AAP including the principle of residential development as a complement to a green ribbon incorporating a town park on the site of the former landfill adjacent to the subject site

2.5.1 Development Plan (Wexford Town and Environs Development Plan)

The subject site is located within the Borough boundary of Wexford Town and as such is subject to the requirements of the Wexford Town and Environs Development Plan 2009- 2015 (extended). The site is located within “Zone 4” of the Plan. With regards to the site specifically, the plan makes the following statements:

“New public sector quarter is developing with the headquarters for the DOE, New County Hall

and expansion of Wexford Hospital. This will result in the opening of lands for development on adjoining sites which will also deliver a significant proportion of the orbital route linking Newtown Road with Park and eventually to the reserved lands for the third river crossing.

Higher densities will be considered along this route, but new developments must have regard to establishing residential units and along these boundaries a transition density will be required.

Carcur/Park

The lands, former landfill and quarry on the banks of the Slaney, have been the subject of a previous action area plan. The community area could be considered for second level education replacement or a new secondary school could be accommodated. Given the Heritage designation of the inlet the open space/park will be located adjacent to this area.

On The old Quarry Site the opportunity exists to create landmark building at the point of the third river crossing. This site will act as a future gateway to the town. Studies may be required on the third bridge prior to determining the location of these buildings”.

In response to the above, it is noted that the DOE building, New County Hall and expansion of Wexford Hospital are all complete, as are significant proportions of the orbital route linking Newtown Road with Park. The development of the subject lands and the realisation of the associated policies and objectives of the development plan represent the next logical progression in terms of the development of Area 4 of the Development Plan.

2.5.2 Site Specific Objectives

The Development Plan includes a number of site specific development objectives all of which have been incorporated into the proposed development.

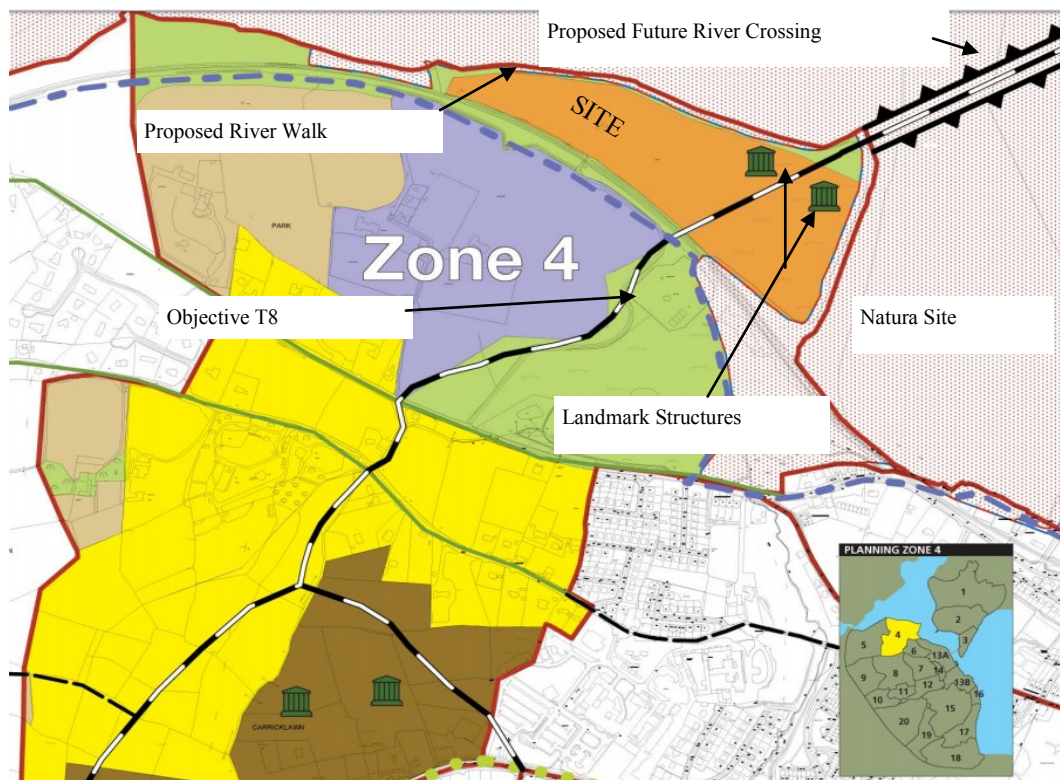


Fig 2.3 Development plan policy

2.5.3 Objective T8 Orbital Inner Relief Road & the Third River Crossing

Objective T8 of the Development Plan relates to the provision of an inner orbital relief road which runs from Sinnottstown lane at the southern extreme of the town boundary in a south-westerly direction until it reaches Clonard. At this point, it changes direction and runs in a north-easterly direction along the rear of Wexford racecourse and on through the subject site to the point where the third river crossing is proposed. Objective T8 terminates on the opposite side of the river. In the context of Area 4 of the Development Plan, Objective T8 has been substantially completed up to the rear boundary of the site.



The proposed development will further extend the Objective T8 inner relief road to the point where a third river crossing is feasible and viable.

2.5.3.1 Existing Part 8 Approved Railway Crossing

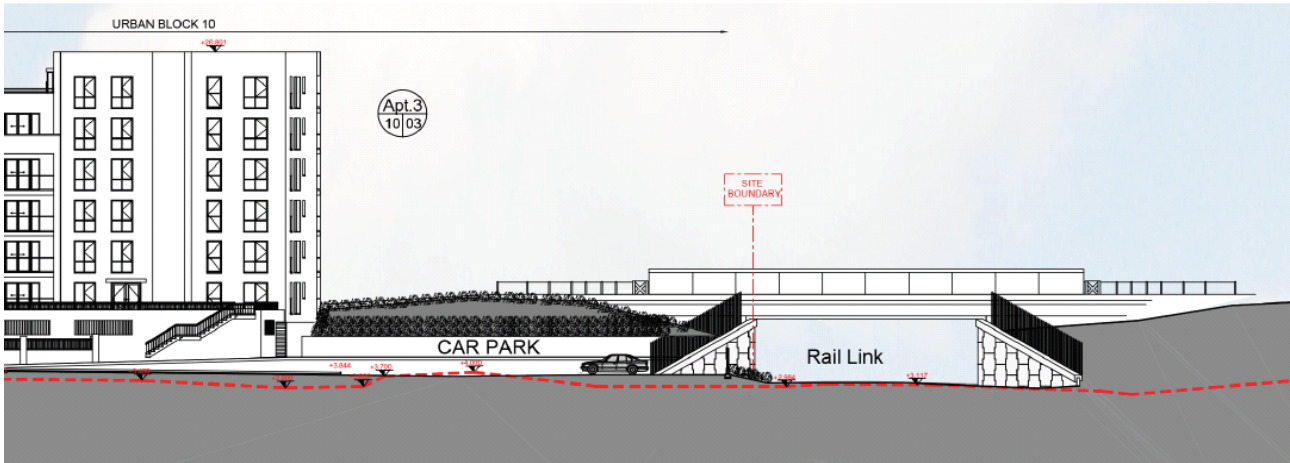


Fig:2.5 Section JJ

Section JJ of the accompanying planning application drawings detail the relationship between the proposed development and the approved bridge over the railway line. As highlighted by the planning application drawings and accompanying engineering drawings, the proposed development has been designed to integrate with the approved bridge. The rail bridge shall be constructed by the developer.

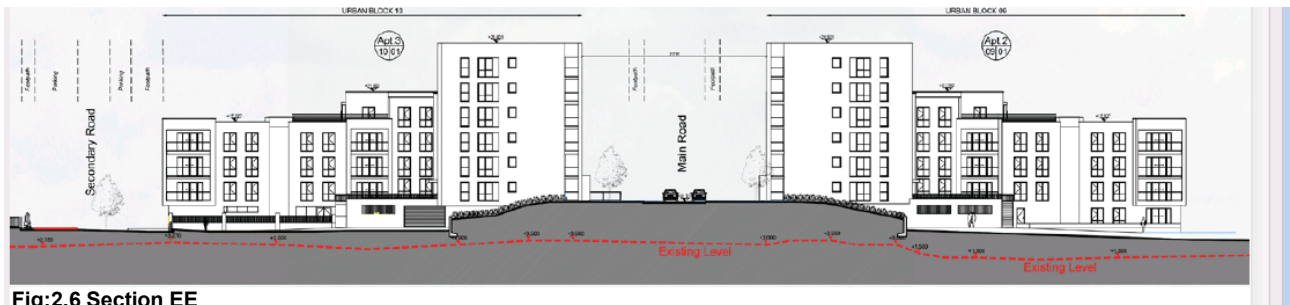


Fig:2.6 Section EE

Section EE of the accompanying planning application drawings highlights the width of the main arterial route through the subject site along the Objective T8 Route. This section demonstrates that there is sufficient reserve to accommodate traffic associated with a future bridge crossing.

The Road Width for streets is defined in DMURS Section 4.4, which states; - *“Lane widths may be increased to 3.5m on arterial and Link Streets where frequent access for larger vehicles is required, there is no median and the total carriageway width does not exceed 7m.”* The proposed road at 7.2m wide therefore provides in excess of the minimum width recommended for an Arterial Street and as such is compliant with the requirements of DMURS.

2.5.3.2 Future Third River Crossing

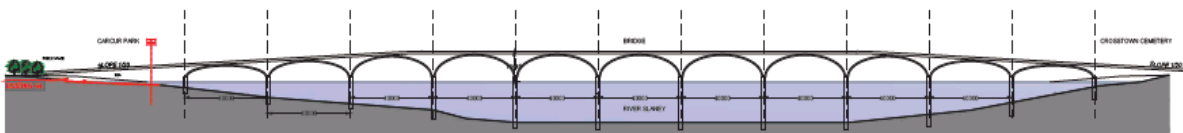


Fig:2.7 Future third river crossing

Sufficient land has also been reserved at the rivers edge to facilitate a bridge with a 1:20 slope of similar construction to that of the Wexford Ferrybank bridge. While the applicant has no control of the lands outside the subject site (edged red), the proposed development has clearly indicated that it facilitates the proposed bridge crossing and integrates with the approved railway bridge.

2.5.4 Coastal Walk

It is an objective of the development plan to provide the following:

- TO2—To ensure the full recreational potential of the River Slaney and its estuary is realised.
- TO3—Provide a pedestrian walkway along the banks of the River Slaney estuary.

While the preservation of habitat associated with wintering birds and the protection of the existing otter population take precedent, proximity to the river will be exploited insofar as is possible.

A linear park with a bird viewing platform form part of the proposal in addition to walkways through the site with views of the river and estuary.

All hard fencing required to protect both the Otter and wintering bird habitats will be suitably screened with planting.

Detailed landscaping proposals are included with the subject application and have been informed by Chapter 6 (Biodiversity) of the EIAR.



PROTECTIVE FENCE SCHEMATIC



2.5.5 Landmark Buildings

It is a site specific objective of the Development Plan to provide a landmark building on site as a gateway to the town. The site will form an important entrance experience to the town once the third river crossing is realised. Landmark buildings at key nodal locations create a sense of place and urban legibility by making locations more readily identifiable. In addition, they add more variance to the urban fabric and act as magnets to public activity.

As part of the proposal, primary and secondary landmark structures are proposed in the form of two large “L” shaped apartment blocks (7 storeys in height) and two smaller scale apartments blocks (four storeys in height) are proposed along the main arterial east west axis.



Fig: 2.8 Landmark Buildings

These buildings will form the main focal point on approach from the proposed third river crossing and will result in a general appearance of “stepping up “ in terms of building heights when viewed from a distance. As detailed in Chapter 10 of the EIAR which states:

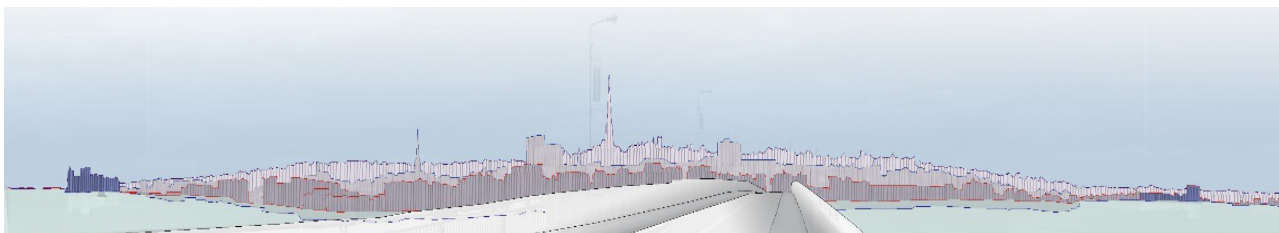
“views directly to the site, are softened by the topography, existing vegetation and backdrop, which help mitigate against visual impact. Distant views will be Slight to Imperceptible and be generally neutral in effect”



Fig: 2.9 DOE and County Hall Buildings

The taller of the proposed landmark buildings are of a similar bulk, scale and form to that of the recently constructed DOE and Wexford County Hall Buildings located in proximity to the site and will be a complementing addition to the urban landscape.

When viewed on approach from the Ferrybank side of the existing bridge, the proposal and associated landmark structures will complement the existing skyline and define the northern termination point of the town.



2.5.6 Other Relevant Policies (Childcare facilities)

Policy C15 of the Wexford Town and Environs Development Plan states:

“Childcare facilities will be required in all new housing developments at a rate of one childcare facility providing for a minimum 20 childcare places for each 75 residential units and in accordance with the DOELG Planning Guidelines for Childcare Facilities 2001, the Childcare (Pre-School Services) Regulations 1996 and Guidelines for Best Practice in the Design of Childcare Facilities. In appropriate cases the Council will support the provision of these spaces off site provided they serve the inhabitants of the development.”

It is proposed to provide crèche facilities on the ground floor of apartment block 2 and block 10. Both crèche facilities are designed to accommodate 30 children and have been designed in accordance with “*Guidelines for Best Practice in the Design of Childcare Facilities*” published by the Department of Children and Youth Affairs. Crèche A will be provided as part of phase 2 while crèche B will be constructed in phase 4.

The high number of Apartment Units throughout the development will result in a reduced demand for Child Care facilities. The number of child spaces required has been calculated by removing the one bed apartments and assuming 50% of the total number of 2 bed apartments and 100% of both the 3 and 4 bed units will generate the need for childcare facilities.

2.5.7 Part V Social affordable housing

Compliance with Part V for the provision of social and affordable housing has been agreed in principle with the Wexford County Council See Full details regarding Part V compliance which accompany the subject application.

3.6 Masterplan

As previously stated, a Masterplan was prepared by Reddy Architecture + Urbanism in tandem with the scoping process for the EIAR. The layout of the scheme evolved over the course of preparing the Masterplan which in turn informed the overall design approach as the various constraints of the site became apparent. The scoping of the EIAR and the evolution of the Masterplan occurred concurrently with the former influencing the latter accordingly.

3.6.1 Site Analysis

A site analysis in the context of both the physical characteristics of the site, the policy requirements of the Development Plan and the scoping process of the EIAR defined the parameters which guided the design approach.

A Natura Protection Boundary (10m set back), and Otter Habitat Protection Boundary were established in addition to land reserve for the provision of the Objective T8 and the third bridge crossing.

Site Analysis



Fig: 3.10 Site Analysis

3.6.2 Open Space

Consideration of the council's policies **TO2** (*To ensure the full recreational potential of the River Slaney and its estuary is realised*) and **TO3** (*Provide a pedestrian walkway along the banks of the River Slaney estuary*) encouraged the early exploration of the provision of open space along the river edge

Later through the design process further areas of open space were introduced throughout the scheme



apartment block 2 and an additional 63 parking days at block 3.



Fig: 3.11 Open Space

3.6.3 Transport Routes

The requirement for the provision for objective T8 dictated the main arterial route through the site, in a south-western to north-eastern direction to the point of the proposed river crossing.

In order to unlock the development potential of the rest of the site, a secondary route is required in a south-eastern to north western direction. Tertiary routes provide access to proposed residential blocks.



Fig: 3.12 Transport Routes

3.6.4 Architectural Plan Form

The Architectural form has been developed to provide a natural extension to Wexford town when viewed from the opposite side of the river Slaney. Once the third river crossing is complete this will become an important bookend to the town in terms of a visual urban boundary. The intention is that the development is seen as a continuation of the existing town, providing a contemporary solution which incorporates a mix of designs and forms which are both modern but sympatric to the existing built environment in terms of scale, finish and materials.



Raised platforms and staggered junctions for traffic calming aid in the creation of pedestrian friendly home zones. A sequence of open space provision in the form of both active and passive spaces of varying sizes, together with a large linear park, ensure easy access to open space for all future residents. Dwellings adjacent to open spaces have been designed and orientated with active facades overlooking open spaces as is consistent with best practice regarding natural surveillance.



3.6.5 Landscaping and Habitat Protection

Indigenous landscaping is proposed and detailed landscaping proposals accompany the subject application. Landscaping proposals were developed in close cooperation with the project ecologist. In particular a constructed pond is required to form an active otter habitat post construction. As previously stated the scoping of the EIAR and the associated establishment of ecological constraints were key parameters informing the overall design approach.

Landscaping proposals form a key aspect of protecting the Natura sites during operation phase.

3.6.7 Phasing of Development

The proposed development will be realized over four phases subject to demand. The adopted masterplan approach sets clear parameters for the entire site, while affording flexibility should alterations to future phases be required to cater for changing demands.

Phase	Area (m2)	Apartments	Hou ses	No. of Units
1	42,904	69	47	116
2	27,680	64	35	99
3	30,448	0	73	73
4	37,368	105	20	125
Total	138,400	238	175	413

Phase 1 will include the construction of the bridge over the rail line (which is covered by a Part 8 agreement between the developer and the local authority). This will facilitate the main arterial road into the site fulfilling the requirements of Objective T8 of the Development Plan.

All subsequent phases of development will utilise the new bridge as the main access point to the site. The former quarry entrance will not be utilised for construction traffic.



Fig: 3.13 Phasing of Development

In order to protect the Natura site and associated habitats, a berm and 5 siltation ponds will be employed to prevent siltation or construction material entering the estuary and will be erected along the otter boundary (retaining walls are also proposed see accompanying engineering details drawings PL11 & PL 12) prior to the commencement of construction. The establishment of the otter pond, monitoring and confirmation of its use is also required prior to commencement of construction.

3.6.8 Density

Section 11.08.01 of the Wexford Town & Environs Development Plan outlines the density requirements for zoned lands within the plan area. The plan defines high density development as density provision of more than 27 units per Ha.

In terms of the “Sustainable Residential Development in Urban Areas” Guidelines for Planning Authorities, the site may be considered to be consistent with the definition of Brownfield Site given its previous use:



Fig: 3.14 Density

“any land which has been subjected to building, engineering or other operations, excluding temporary uses or urban green spaces”, generally comprise redundant industrial lands or docks but may also include former barracks, hospitals or even occasionally, obsolete housing areas”.

However the location of the site relative to Wexford Town Centre is consistent with the guidelines definition of “Outer Suburban” defined as:

“open lands on the periphery of cities or larger towns whose development will require the provision of new infrastructure, roads, sewers and ancillary social and commercial facilities, schools, shops, employment and community facilities”.

The net density provision for outer suburban sites as defined by the guidelines is *“in the general range of 35-50 dwellings per hectare”*. The guidelines also state that *“net densities less than 30 dwellings per hectare should generally be discouraged”*

The proposed development has a net density provision of 40 units per Ha which is considered more than the requirements of the Wexford Town & Environs Development Plan and is comfortably within the range recommended by the “Sustainable Residential Development in Urban Areas Guidelines”.

Table3.3 Density	
Site Area	138,400
Residential Density	40 Units per Ha
Plot Ratio	0.51
Site coverage (sq.m)	13.08%
Public Open Space (sq.m)	39,224
Large Open Space + road (from bridge to rail link)	36,334

4.0 National Policy Framework

The following Section 28 guidelines were considered in the formulation of this development proposal.

- Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities 2009 *Relevant to the proposal*
 - Sustainable Residential Development in Urban Areas 2009 *Relevant to the proposal*
 - Urban Design Manual – Best Practice Guidelines 2009 *Relevant to the proposal*
 - Sustainable Urban Housing Design Standards for New Apartments 2007 *Relevant to the proposal*
 - The Planning System and Flood Risk Management 2009 *Relevant to the proposal*
 - Irish Design Manual for Urban Roads and Streets (2013) *Relevant to the proposal*
 - Spatial Planning and National Roads Guidelines for Planning Authorities (2012) *Not relevant to the proposal*
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 - Sustainable Rural Housing – Guidelines for Planning Authorities (2005) *Not relevant to the proposal*
 - Development Plans – Guidelines for Planning Authorities (2007) *Not relevant to the proposal*
 - Wind Energy – Development Guidelines for Planning Authorities (2006) *Not relevant to the proposal*
 - Telecommunications Antennae and Support Structures – Guidelines for Planning Authorities (1996) *Not relevant to the proposal*
 - Development Management – Guidelines for Planning Authorities (2007) *Not relevant to the proposal*
 - Code of Practice on the Provision of Schools and the Planning System (2008) *Relevant to the proposal*
 - Urban Development and Building Heights Guidelines for Planning Authorities (2018) *Relevant to the proposal*
 - Quality Housing for Sustainable Communities – Design Guidelines (2007) *Relevant to the proposal*
 - Draft Landscape and Landscape Assessment Guidelines (2000) and EPA's Guidelines on the Information to be Contained in Environmental Impact Statements, 2002, *Relevant to the proposal*
-

5.0 Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities 2009

The site is located adjacent to the Wexford Harbour and the Raven Special Protection Areas for birds (SPAs) in addition to the Slaney River Valley Special Areas of Conservation (SACs) all of which are Natura 2000 sites.

In accordance with Article 6(3) of the EU Habitats Directive (92/43/EEC), the potential impacts of any project on the conservation objectives of a Natura 2000 site of European conservation importance, including Special Areas of Conservation (SACs) and Special Protection Areas for birds (SPAs), are to be assessed by means of Appropriate Assessment (AA). The Habitats Directive is transposed into Irish Law by the European Communities (Birds and Natural Habitats) Regulations S.I. No. 477 of 2011. The purpose of AA is to assess the impacts of projects in combination with the effects of other plans and projects against the conservation objectives of a Natura 2000 site and to ascertain whether they would adversely affect the integrity of that site. In the context of development planning, AA is carried out under the provisions of the Planning and Development Acts 2000 to 2011. A Natura Impact Statement (NIA) has been prepared in respect to the proposed development and should be read in conjunction with this document

The scope of the assessment to inform the Natura Impact Statement (NIA) was determined by a combination of consultations with National Parks and Wildlife Service (NPWS), Inland Fisheries Ireland, desktop research and ecological field surveys.

The proposed project has been assessed taking into account

- the nature, size and location of the proposed development and the associated works and possible impacts arising from same.
- the qualifying interests, conservation objectives and conservation status of the adjacent Natura sites –the Slaney River Valley SAC, The Wexford Harbour and Slobs SPA and The Raven SPA
- the potential for impacts arising from the development on the adjacent Natura sites and
- the potential for cumulative impacts arising from current or future development in the area.

The overall conclusion of the Natura Impact Statement report is that provided mitigation measures as summarized in Section 12 and detailed in the relevant impact assessment sections of the NIA are implemented in full, there will be no significant direct, indirect or cumulative negative effects on the conservation objectives of the Slaney River Valley SAC or the Wexford Harbour and Slobs SPA or The Raven SPA.

4.2 Sustainable Residential Development in Urban Areas Guidelines 2009

Each chapter of the Sustainable Residential Development in Urban Areas (2009) includes a check list. The proposed development is assessed against relevant aspects of the checklists on a chapter by chapter basis as follows:

Chapter 2: Checklist	Response
<ul style="list-style-type: none"> • Does the draft development plan, local area plan or SDZ planning scheme contain policies and objectives which will underpin the creation of sustainable residential development? • Do they include clear guidance on implementation measures, particularly with regard to the phased and co-ordinated provision of physical infrastructure, public transport and community facilities? • Has consideration been given to the formation of an implementation team with a project leader whose task is to oversee the sustainable development of the area (especially Development Areas in Gateways and Hubs)? 	<p>N/A</p> <p>The proposal includes details of phasing, delivers necessary infrastructure and community objectives and is located adjacent to a future public transport corridor in the form of an existing railway line.</p> <p>N/A</p>
<p style="text-align: center;">Chapter 3: Checklist</p> <ul style="list-style-type: none"> • Does the development plan include urban design policies which are capable of being expanded in more detail in local area plans? • Have design briefs being issued and design statements received for particularly important, sensitive or large-scale development sites? • Have the 12 criteria set out in the companion Best Practice Urban Design Manual been used both in pre-application consultations and in assessing applications? • Have designers of urban housing schemes carried out a site appraisal prior to preparing a layout? • Is the standard of design of a sufficiently high standard? If the design would result in a poor quality environment, do the reasons for refusal make it clear how any revised design needs to be improved? • Does the design of residential streets strike the right balance between the different functions of the street, including a "sense of place"? 	<p>N/A</p> <p>The development proposal includes a detailed Design Access Statement prepared by the project Architects Readdy Architecture +Urbanism</p> <p>Yes this is discussed in more detail in the next section 5.0.</p> <p>Yes See accompanying Design Access Statement</p> <p>Proper consideration of all appropriate design criteria in accordance with best practice were considered in the formulation of this development proposal.</p> <p>A hierarchy of streets are proposed relative to function. Shared surfaces, raised platforms and alternative paving designs are employed to aid in the creation of a sense of place and to help define function.</p>

Chapter 4: Checklist

- Are the lands proposed for development in accordance with the sequencing priorities set out in the development plan or local area plan?
- Has an assessment of the capacity of existing schools or the need for new school facilities been carried in connection with proposals for substantial residential developments?
- Have the other necessary agencies inputted into the plan/ development proposal?
- Is there an appropriate range of community and support facilities, when and where they are needed?
- In the case of higher density schemes, is there adequate existing public transport or will it be provided in tandem with development?
- Will the development:
 - prioritise public transport, cycling and walking, and dissuade the use of cars?
 - ensure accessibility for everyone, including people with disabilities?
 - encourage more efficient use of energy and a reduction in greenhouse gas emissions?
 - include the right quality and quantity of public open space
 - include measures to ensure satisfactory standards of personal safety and traffic safety within the neighbourhood?
 - Present an attractive and well-maintained appearance?
 - Promote social integration and provide for a diverse range of household types, age groups and mix of housing tenures?
 - protect, and where possible enhance, the built and natural heritage?
 - provide for Sustainable Drainage Systems?

Response

Yes the subject site represents the logical expansion of the town and is supported by policies to this effect.

Yes contained in Chapter 5 of the EIAR

N/A

N/A

Bus bays are provided in addition to connections to the coastal walk/cycleway. A significant contribution has been paid towards the provision of a park adjacent to the site to provide further connectivity to the town centre.

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Yes

Chapter 5: Checklist
<ul style="list-style-type: none"> • Are residential densities sufficiently high in locations which are, or will be, served by public transport?
<ul style="list-style-type: none"> • Have proposals for higher densities been accompanied in all cases by high qualitative standards of design and layout?
<ul style="list-style-type: none"> • Does the design and location of new apartment blocks respect the amenities of existing adjacent housing in terms of sunlight and overlooking?

Response

Yes. Apartments are provided along the main arterial route through the scheme.

Yes

While the site is a broad field site there are no existing adjoining residential developments.

Chapter 6: Checklist
<ul style="list-style-type: none"> • Is the Local Area Plan or supplementary non-statutory planning framework focused on securing development patterns that are sustainable in economic and social development and environmental protection terms, recognising the challenges faced by rural economies in the future?
<ul style="list-style-type: none"> • Is the scale of development envisaged in terms of future housing, population, retail and employment growth in line with the overall County Development Plan Settlement and Housing Strategies and any Regional Planning Guidelines in force?
<ul style="list-style-type: none"> • Will the plan ensure a compact and easily walkable town or village creating forms of development that will make walking and cycling, especially for local trips, more attractive than using the car?
<ul style="list-style-type: none"> • Are the densities being promoted in line with the densities recommended in these guidelines?
<ul style="list-style-type: none"> • Are adequate arrangements in place to ensure that the scale of new housing development schemes is in proportion to the pattern and grain of existing development?
<ul style="list-style-type: none"> • Have policies been put in place to ensure that the design, layout and character of new development successfully relates to the local character and heritage of the existing small town or village?

N/A

Yes

The site is walkable to the town centre and the proposed lineal park and associated coastal walk will make walking/cycling more attractive than the car.

Yes, 40 units per HA is proposed as defined as “outer suburban” by the guidelines.

N/A

The development is appropriate in terms of scale and in the context of the future development of Wexford Town .

Chapter 7: Checklist	Response
<ul style="list-style-type: none"> • In higher density developments, does the quality of design and finish extend also to the individual dwelling and its immediate surroundings? 	Yes
<ul style="list-style-type: none"> • Do new homes offer decent levels of amenity, privacy, security and energy efficiency? 	Yes in line with required standards
<ul style="list-style-type: none"> • Will the orientation of the dwelling and its internal layout maximise levels of daylight and sunlight, thus influencing not only the amenity of the occupants but the energy demand for heat and light? 	Yes. The design maximises solar potential within the constraints of the site.
<ul style="list-style-type: none"> • Has privacy been considered in the design of the home? 	Yes minimum separation distances of the Development Plan are provided.
<ul style="list-style-type: none"> • Has the design sought, where possible, to create child- and pedestrian-friendly car-free areas, especially in higher density schemes, through the careful location of access streets and parking areas? 	Yes.
<ul style="list-style-type: none"> • Do all houses (terraced, semi-detached and detached) have an area of private open space behind the building line? 	Yes
<ul style="list-style-type: none"> • Has the design been influenced by the principles of universal design (see chapter 1)? 	Yes see next section
<ul style="list-style-type: none"> • Has adequate provision been made for the storage and collection of waste materials? 	Yes
Chapter 8: Checklist	
<ul style="list-style-type: none"> • Has consideration been given to the formation of an implementation team whose focus is to roll out the development plan / local area plan objectives with a particular emphasis on newly developing areas? 	N/A
<ul style="list-style-type: none"> • Is the planning authority through its web site, information leaflets etc giving up to date information for the members, developers, applicants and the general public? 	N/A
<ul style="list-style-type: none"> • Has the development plan indicated the sequencing within the development plan, phasing objectives of local area plans, and the role of non statutory design briefs or design statements? 	N/A
<ul style="list-style-type: none"> • Are pre-application discussions carried out on all major developments? 	Section 5 Pre application discussions took place in addition to a number of pre planning discussions with the planning authority. (attached)
<ul style="list-style-type: none"> • Is there a monitoring programme of completed developments to ensure that the development meets the development plan objectives with particular reference to quality of the public realm? 	This should be required as a condition of grant.

6.0 Urban Design Manual – Best Practice Guidelines 2009

The Urban Design Manual establishes 12 criteria with “indicators” to provide the basis of a project assessment. Responses are offered by means of comment as follows:

6.1 Neighbourhood

NEIGHBOURHOOD	01 CONTEXT How does the development respond to its surroundings?	02 CONNECTIONS How well connected is the new neighbourhood?
	<ul style="list-style-type: none"> • The development seems to have evolved naturally as part of its surroundings • Appropriate increases in density respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring users • Form, architecture and landscaping have been informed by the development's place and time • The development positively contributes to the character and identity of the neighbourhood • Appropriate responses are made to the nature of specific boundary conditions 	<ul style="list-style-type: none"> • There are attractive routes in and out for pedestrians and cyclists • The development is located in or close to a mixed-use centre • The development's layout makes it easy for a bus to serve the scheme • The layout links to existing movement routes and the places people will want to get to • Appropriate density, dependent on location, helps support efficient public transport

Comment

Context

The development evolved through the concurrent processes of preparing a masterplan for the site and scoping an EIAR. Boundary treatments relative to the adjoining Natura sites have been carefully considered with the primary goal of preserving and enhancing existing habitats for otters and wintering water birds. Form, Architecture and landscaping have been considered in the context of the sites relationship to Wexford Town and the proposed river crossing. In urban design terms the proposals will bookend the northern boundary of the town when viewed from the opposite side of the river. Changes in density throughout the site has been employed to create policy required landmark structures which will aid in the creation of character and identity.

Connections

The development achieves a number of significant policies with regards to connectivity namely objective T8 of the development plan which provides for an inner orbital relief road, a crossing point over the river Slaney and the provision of a river walk which will connect to the Wexford quay front via the proposed Carcur Park which abuts the site to the southeast. The development is located within a short walking/ cycling distance from Wexford town centre. Internally, the design of the scheme incorporates elements of the “Home Zone” principle to create a pedestrian and cycle friendly environment with appropriate provision of traffic calming through the provision of raised platforms, cycle lanes and footpaths. Density encourages the viability of public transport provision with higher densities along main arterial routes.

03 INCLUSIVITY

How easily can people use and access the development?

- New homes meet the aspirations of a range of people and households
- Design and layout enable easy access by all
- There is a range of public, communal and/or private amenity spaces and facilities for children of different ages, parents and the elderly
- Areas defined as public open space that have either been taken in charge or privately managed will be clearly defined, accessible and open to all.
- New buildings present a positive aspect to passers by, avoiding unnecessary physical and visual barriers

04 VARIETY

How does the development promote a good mix of activities?

- Activities generated by the development contribute to the quality of life in its locality
- Uses that attract the most people are in the most accessible places
- Neighbouring uses and activities are compatible with each other
- Housing types and tenure add to the choice available in the area
- Opportunities have been taken to provide shops, facilities and services that complement those already available in the neighbourhood

Comment

Inclusivity

Unnecessary physical and visual barriers are avoided, all areas defined as public realm are easily identifiable, accessible and open to all. A sequence of open spaces are provided throughout the scheme. Including active and passive open spaces with child play areas. Consideration has been given to the location of large playing fields located to the rear of the subject site and the proposed park/ linear walk between the subject site and the town centre in formulating an open space strategy for the site.

Variety

The proposal consists of a housing development with on site crèche facilities to cater for the associated population. Consideration was initially given to a mix of uses including provision of neighbourhood centre uses. A small neighbourhood centre store of 80sq.m is proposed to serve the local population only. There has been limited take up of land zoned for neighbourhood centre developments and where such development have taken place they suffer from high vacancy rates. The ground floors of the apartment blocks have been designed to adapt to potential future demand for such uses. There is a strong mix of housing types and tenures proposed.

6.2 Site

SITE	05 EFFICIENCY How does the development make appropriate use of resources, including land?	06 DISTINCTIVENESS How do the proposals create a sense of place?
	<ul style="list-style-type: none"> • The proposal looks at the potential of higher density, taking into account appropriate accessibility by public transport and the objectives of good design • Landscaped areas are designed to provide amenity and biodiversity, protect buildings and spaces from the elements and incorporate sustainable urban drainage systems • Buildings, gardens and public spaces are laid out to exploit the best solar orientation • The scheme brings a redundant building or derelict site back into productive use • Appropriate recycling facilities are provided 	<ul style="list-style-type: none"> • The place has recognisable features so that people can describe where they live and form an emotional attachment to the place • The scheme is a positive addition to the identity of the locality • The layout makes the most of the opportunities presented by existing buildings, landform and ecological features to create a memorable layout • The proposal successfully exploits views into and out of the site • There is a discernable focal point to the scheme, or the proposals reinforce the role of an existing centre

Comment

Efficiency

An assessment of potential densities was undertaken as part of the Masterplan preparation process. Various densities were considered across the entire site to determine which areas of the site were best suited to which densities considering the surrounding landscape, policy requirements and potential visual impacts. Biodiversity and the protection and enhancement of the existing surrounding habitats were at the forefront of the design process including the provision of private and public open spaces. All open space provision is policy compliant.

Distinctiveness

A sense of place is created through the provision of landmark structures in the form of apartment buildings. A sequence of open spaces is provided which utilise landform and ecological features to create a memorable layout. Views of the river are maximised and a focal point created in and out of the scheme along the policy mandated T8 route and future river crossing point.

07 LAYOUT

How does the proposal create people friendly streets and spaces?

- Layout aligns routes with desire lines to create a permeable interconnected series of routes that are easy and logical to navigate around.
- The layout focuses activity on the streets by creating active frontages with front doors directly serving the street
- The streets are designed as places instead of roads for cars, helping to create a hierarchy of space with less busy routes having surfaces shared by pedestrians, cyclists and drivers
- Traffic speeds are controlled by design and layout rather than by speed humps
- Block layout places some public spaces in front of building lines as squares or greens, and some semi private space to the back as communal courts

08 PUBLIC REALM

How safe, secure and enjoyable are the public areas?

- All public open space is overlooked by surrounding homes so that this amenity is owned by the residents and safe to use
- The public realm is considered as a usable integrated element in the design of the development
- Children's play areas are sited where they will be overlooked, safe and contribute to the amenities of the neighborhood
- There is a clear definition between public, semi private, and private space
- Roads and parking areas are considered as an integral landscaped element in the design of the public realm.

Comment

Layout

Aspects of the proposed layout are dictated by the policies of the development plan in particular Objective T8 which defines the location of the main arterial route into the site. Other defined parameters such as the need to maintain a 10m buffer from the Natura sites also limit the scope of the proposal. Active street frontages, definable home zones, traffic calming and courtyard type parking provision to the rear of buildings create people friendly spaces.

Public Realm

All areas of open space are overlooked including proposed play areas. There is a clear delineation between private and public and active and passive open spaces. Incidental open spaces around car parkings bays are planted in the interest of "greening" the overall development at street level.

6.3 Home

HOME	09 ADAPTABILITY How will the buildings cope with change?	10 PRIVACY AND AMENITY How does the scheme provide a decent standard of amenity?
	<ul style="list-style-type: none"> • Designs exploit good practice lessons, such as the knowledge that certain house types are proven to be ideal for adaptation • The homes are energy-efficient and equipped for challenges anticipated from a changing climate • Homes can be extended without ruining the character of the types, layout and outdoor space • The structure of the home and its loose fit design allows for adaptation and subdivision, such as the creation of an annexe or small office • Space in the roof or garage can be easily converted into living accommodation 	<ul style="list-style-type: none"> • Each home has access to an area of useable private outdoor space • The design maximises the number of homes enjoying dual aspect • Homes are designed to prevent sound transmission by appropriate acoustic insulation or layout • Windows are sited to avoid views into the home from other houses or the street and adequate privacy is affordable to ground floor units. • The homes are designed to provide adequate storage including space within the home for the sorting and storage of recyclables.

Comment

Adaptability

Best practice is employed throughout the design of the scheme. The majority of the apartments conform with the development plan requirement for a minimum size of 75sq.m floor area. A total of 8 apartment fall below this but still conform to the requirements of the Sustainable Housing Guidelines. All apartments are wheelchair adaptable and lower density house types have been designed with convertible garages and wide internal hallways for the potential provision of lifts adaptable as both housing for all and specialist housing units for the elderly.

A significant proportion of rear garden sizes are sufficient to accommodate future extensions while maintaining minimum garden size standards.

Privacy and Amenity

All units have access to policy compliant private open space. The orientation of proposed dwellings preserve privacy for private open spaces while ensuring appropriate natural surveillance for public open spaces and pedestrian routes throughout the scheme.

11 PARKING

How will the parking be secure and attractive?

- Appropriate car parking is on-street or within easy reach of the home's front door.
- Parked cars are overlooked by houses, pedestrians and traffic, or stored securely, with a choice of parking appropriate to the situation.
- Parking is provided communally to maximise efficiency and accommodate visitors without the need to provide additional dedicated spaces
- Materials used for parking areas are of similar quality to the rest of the development
- Adequate secure facilities are provided for bicycle storage

12 DETAILED DESIGN

How well thought through is the building and landscape design?

- The materials and external design make a positive contribution to the locality
- The landscape design facilitates the use of the public spaces from the outset
- Design of the buildings and public space will facilitate easy and regular maintenance
- Open car parking areas are considered as an integral element within the public realm design and are treated accordingly
- Care has been taken over the siting of flues, vents and bin stores

Parking & Detailed Design

Parking is provided in accordance with recognised standards.

7.0 Sustainable Urban Housing Design Standards for New Apartments 2007

Seven blocks of apartments are proposed ranging from 50 units per apartment block to 19 units per apartment block.

In total 238 of the proposed 413 residential units are provided by apartments. The proposed floor areas are in excess of required minimum areas set out in the guidelines published in March 2018. Private amenity space is provided in the form of balconies and private terraces which are also consistent with minimum requirements.

Communal bin stores are provided for all apartment blocks.

A Housing and Quality Assessment has been prepared by Ready Architecture + Urbanism and should be read in conjunction with this document in addition to submitted block plans. Compliance with Section 6 of the Sustainable Urban Housing Design Standards for New Apartments 2007 is demonstrated as follows:

Total Apartments with 10% above the minimum surface area	67	28%
Number of Apartments	238	100%
Net Floor Area TOTAL	6126.30	
1 Bed	14	5.88%
2 Bed	200	84.03%
3 Bed	24	10.08%
Total Bedspaces	486	
Total Proposed Private Open Space vs Required Private Open Space		3866.2

APARTMENT SCHEDULE OF ACCOMODATION															
URBAN BLOCK 1															
BLOCK	CORE	LEVEL	APT. NO.	DESCRIPTION	BED SPACE	AGGREGATE BEDROOM AREA	AGGREGATE LIVING AREA	STORAGE	ASPECT	ORIENTATION	AMENITY SPACE M2	MINIMUM AMENITY SPACE M2	FLOOR AREA M2	Minimum Floor	DIF.
APARTMENT 1	CORE A	GROUND	A 00-05	Type 4	2 Bed	30.50	34.40	7.50	2	NW/SW	40.80	7.00	97.00	73.00	33%
		GROUND	A 00-06	Type 5	3 Bed	42.70	34.20	6.10	1	NE	36.80	9.00	110.90	90.00	23%
		GROUND	A 00-07	Type 2	2 Bed	24.50	30.10	6.00	2	NE/SE	37.40	7.00	75.30	73.00	3%
		GROUND	A 00-08	Type 3	2 Bed	24.50	30.20	6.20	1	SE	32.00	7.00	75.00	73.00	3%
		1ST	A 01-09	Type 3	2 Bed	24.50	30.20	6.20	1	SE	7.70	7.00	75.00	73.00	3%
		1ST	A 01-10	Type 2	2 Bed	24.50	31.20	6.00	2	SW/SE	8.40	7.00	76.40	73.00	5%
		1ST	A 01-11	Type 2	2 Bed	24.50	31.20	6.00	2	SW/NW	8.20	7.00	76.40	73.00	5%
		1ST	A 01-12	Type 3	2 Bed	24.50	30.20	6.10	1	NW	9.90	7.00	74.90	73.00	3%
		1ST	A 01-13	Type 4	2 Bed	30.50	34.50	7.10	2	NW/SW	9.90	7.00	97.00	73.00	33%
		1ST	A 01-14	Type 5	3 Bed	42.70	34.20	9.40	1	NE	21.70	9.00	110.90	90.00	23%
		1ST	A 01-15	Type 2	2 Bed	24.50	30.10	6.00	2	NE/SE	8.40	7.00	75.30	73.00	3%
		1ST	A 01-16	Type 3	2 Bed	24.50	30.20	6.20	1	SE	7.70	7.00	75.00	73.00	3%
		2nd	A 02-17	Type 3	2 Bed	24.50	30.20	6.20	1	SE	7.70	7.00	75.00	73.00	3%
		2nd	A 02-18	Type 2	2 Bed	24.50	31.20	6.00	2	SE/SW	8.40	7.00	76.40	73.00	5%
		2nd	A 02-19	Type 2	2 Bed	24.50	31.20	6.00	2	SO/NW	8.20	7.00	76.40	73.00	5%
		2nd	A 02-20	Type 3	2 Bed	24.50	30.20	6.10	1	NW	9.90	7.00	74.90	73.00	3%
		2nd	A 02-21	Type 4	2 Bed	31.00	34.50	7.00	2	NW/SW	9.90	7.00	97.00	73.00	33%
		2nd	A 02-22	Type 5	3 Bed	42.70	34.20	9.40	1	NE	21.70	9.00	110.90	90.00	23%
	2nd	A 02-23	Type 2	2 Bed	24.50	30.10	6.00	2	NE/SE	8.40	7.00	75.30	73.00	3%	
	3rd	A 02-24	Type 3	2 Bed	24.50	30.20	6.20	1	SE	7.70	7.00	75.00	73.00	3%	
	3rd	A 03-25	Type 3	2 Bed	24.50	30.20	6.20	1	SE	7.70	7.00	75.00	73.00	3%	
	3rd	A 03-26	Type 2	2 Bed	24.50	31.20	6.00	2	SE/SW	8.40	7.00	76.40	73.00	5%	
	3rd	A 03-27	Type 2	2 Bed	24.50	31.20	6.00	2	SO/NW	8.20	7.00	76.40	73.00	5%	
	3rd	A 03-28	Type 3	2 Bed	24.50	30.30	6.10	1	NW	9.90	7.00	74.90	73.00	3%	
	3rd	A 03-29	Type 4	2 Bed	31.00	34.50	7.00	2	NW/SW	9.90	7.00	97.00	73.00	33%	
	3rd	A 03-30	Type 5	3 Bed	42.70	34.20	9.40	1	NW	21.70	9.00	110.90	90.00	23%	
	3rd	A 03-31	Type 2	2 Bed	24.50	30.20	6.00	2	NW/SW	8.40	7.00	75.40	73.00	3%	
	3rd	A 03-32	Type 3	2 Bed	24.50	30.20	6.20	1	SW	7.70	7.00	75.00	73.00	3%	
	4th	A 04-33	Type 10	2 Bed	24.40	31.00	6.00	1	NW	55.00	7.00	76.40	73.00	5%	
	4th	A 04-34	Type 11	2 Bed	24.40	30.70	6.00	2	NW-NE-SE	95.00	7.00	77.90	73.00	7%	
	4th	A 04-35	Type 10	2 Bed	24.40	31.00	6.00	1	SE	18.80	7.00	76.40	73.00	5%	
	CORE B	GROUND	B 00-01	Type 3	2 Bed	24.70	30.10	6.10	1	NE	25.30	7.00	75.00	73.00	3%
		GROUND	B 00-02	Type 3	2 Bed	24.60	30.20	6.10	1	SW	82.50	7.00	75.00	73.00	3%
		GROUND	B 00-03	Type 8	2 Bed	25.70	30.10	6.20	2	SO/NW	36.90	7.00	76.50	73.00	5%
		GROUND	B 00-04	Type 7	2 Bed	33.70	30.20	6.80	2	NE/NE	28.70	7.00	85.30	73.00	17%
		1ST	B 01-05	Type 3	2 Bed	24.60	30.20	6.10	1	NW	8.20	7.00	75.00	73.00	3%
1ST		B 01-06	Type 3	2 Bed	24.60	30.20	6.10	1	SW	7.50	7.00	75.00	73.00	3%	
1ST		B 01-07	Type 8	2 Bed	25.60	33.60	6.20	2	SO/NW	9.10	7.00	76.50	73.00	9%	
1ST		B 01-08	Type 9	2 Bed	38.70	34.00	9.00	2	NW/SE	9.00	7.00	108.40	90.00	20%	
2nd		B 02-09	Type 3	2 Bed	24.60	30.20	6.10	1	NW	8.20	7.00	75.00	73.00	3%	
2nd		B 02-10	Type 3	2 Bed	24.60	30.20	6.10	1	SW	7.50	7.00	75.00	73.00	3%	
2nd		B 02-11	Type 8	2 Bed	25.60	33.60	6.20	2	SW/NW	9.10	7.00	76.50	73.00	9%	
2nd		B 02-12	Type 9	3 Bed	38.70	34.00	9.00	2	NW/NE	9.00	9.00	108.40	90.00	20%	
3rd		B 03-13	Type 3	2 Bed	24.60	30.20	6.10	1	NE	8.20	7.00	75.00	73.00	3%	
3rd		B 03-14	Type 3	2 Bed	24.60	30.20	6.10	1	SW	7.50	7.00	75.00	73.00	3%	
3rd		B 03-15	Type 8	2 Bed	25.60	33.60	6.20	2	SW/NW	9.10	7.00	76.50	73.00	9%	
3rd		B 03-16	Type 9	3 Bed	38.70	34.00	9.00	2	NW/NE	9.00	9.00	108.40	90.00	20%	

8.0 The Planning System and Flood Risk Management

A Site Specific Flood Risk Assessment Report has been prepared by IE Consulting for the subject site in consideration of the proposed development. In consideration of the findings of this site specific flood risk assessment and analysis the following conclusions and recommendations are made in respect of the proposed development site:-

- *A Site Specific Flood Risk (SSFRA) assessment, appropriate to the type and scale of development proposed, and in accordance with 'The Planning System and Flood Risk Management Guidelines – DoEHLG-2009' has been undertaken.*
 - *The area of the proposed site has been screened, scoped and assessed for flood risk in accordance with the above guidelines.*
 - *The primary flood risk to the proposed site can be attributed to an extreme fluvial and/or tidal flood event in the River Slaney and Slaney Estuary located adjacent to the northern and eastern boundaries of the site.*
 - *Based on the Final CFRAM fluvial mapping in the vicinity of the site, the 1% AEP (1 in 100 Year – Flood Zone 'A') and 0.1% AEP (1 in 1000 year – Flood Zone 'B') extreme flood levels in the River Slaney in the vicinity of the proposed development site are predicted as 1.34 m OD (Malin) for both the 1% and 0.1% AEP events respectively.*
 - *Based on the Irish Coastal Protection Strategy Study mapping in the vicinity of the site, the 0.5% AEP (1 in 200 Year – Flood Zone 'A') and 0.1% AEP (1 in 1000 year – Flood Zone 'B') extreme tidal flood levels in the River Slaney in the vicinity of the proposed development site are predicted as 1.76 m OD (Malin) and 1.95 m OD (Malin) for the Current Scenario and 2.76 m OD (Malin) and 2.95 m OD (Malin) for the High End Future Scenario respectively.*
 - *A detailed Digital Terrain Model (DTM) has been developed for the area of the proposed development site. Utilising the DTM the predicted extreme fluvial and tidal flood extents have been delineated over the full extent of the proposed development site.*
 - *In consideration of the findings of this Site Specific Flood Risk Assessment, and in the context of 'The Planning System & Flood Risk Management Guidelines – 2009' areas of the proposed development site fall within Flood Zone 'A' and Flood Zone 'B'.*
 - *It is proposed to raise the existing ground levels within the site area to a minimum level of 2.95m OD, which is equal to the predicted 1 in 1000 year (0.1% AEP) High End Future Scenario tidal flood level in the vicinity of the site. This level of 2.95m OD is 1m above the 1 in 1000 year tidal flood level for the Current Scenario.*
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- *It is recommended that the finished floor levels are constructed a minimum of 0.3m above the predicted 1 in 1000 year tidal flood level (0.1% AEP) for the High End Future Scenario, i.e. 2.95 + 0.3m = 3.25m OD (Malin).*
- *It is recommended that any existing or proposed surface water pipes or culverts within the site boundary are fitted with appropriately designed tidal flap valves.*
- *In consideration of the Current Scenario, the volume of tidal flood waters that may be displaced by the proposed development site are negligible in consideration of the occurrence of an extreme 0.5% AEP or 0.1% AEP tidal flood event in the Slaney Estuary. Displacement of these negligible volumes of flood waters from the area of the proposed development site would simply be attenuated within the vast volume of flood waters within the slaney Estuary and would have an imperceptible impact on the hydrological regime of the area.*
- *In consideration of the predicted 0.1% AEP flow rate in the River Slaney in the vicinity of the site the volume of fluvial flood waters that may be displaced by the proposed development site are negligible in consideration of the occurrence of an extreme 1 % AEP or 0.1% AEP fluvial flood event in the River Slaney. Displacement of these negligible volumes of flood waters from the area of the proposed development site would simply be attenuated within the vast volume of flood waters within the River Slaney and would have an imperceptible impact on the hydrological regime of the area.*
- *As discussed in Section 9 of the Site Specific Flood Risk (SSFRA) Assessment, development of the site is therefore not expected to have an adverse impact on the existing hydro-morphological regime of the Slaney Estuary.*
- *In consideration of the assessment and analysis undertaken as part of this Site Specific Flood Risk Assessment, overall development of the site is not expected to result in an adverse impact to the hydrological regime of the area and is not expected to adversely impact on adjacent lands or properties.*

Surface Water Drainage

The Site Specific Flood Risk Assessment Report states the following with regards to Surface water disposal

- There is potential for surface water runoff generated within the proposed development site to result in an adverse impact to the existing hydrological regime of the area. Surface water runoff generated within the site shall be attenuated to Greenfield Runoff rates in accordance with the GDSDS to protect the hydrological regime of the area including the River Slaney and the Estuary.
 - There are five attenuation systems proposed within the development site, which have been designed for no flooding up to the 1 in 100 year rainfall event. The discharge from each of these attenuation systems shall be limited to Greenfield Runoff rates using a flow control device such as a 'Hydrobrake'. The discharge pipes shall be fitted with tidal flaps and shall discharge to the estuary.
 - The proposed surface water management system shall not result in any displacement of flood waters in the area. As such there will be no increase in runoff from the site beyond the 'greenfield' runoff rate and therefore the development as proposed will not pose an increased flood risk to the area.
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8.1 Application of the Justification Test in Development Management

Box 5.1 of the *“Flood Risk Management Guidelines for Planning Authorities”* includes a justification Test for development management which states when considering proposals for development that specific criteria must be satisfied. Section 7.2.10 of the accompanying document *“Site Specific Flood Risk Assessment Report”* prepared by IE Consulting contains a full assessment of the proposed development in terms of the justification test.

9.0 Irish Design Manual for Urban Roads and Streets (2013)

Natural traffic calming has been incorporated into the proposed layout through the use of staggered junctions, the provision of shared road surface, raised pedestrian platforms and consolidated visitor parking throughout the scheme. Such measures are aimed at reducing vehicular speed and providing a higher quality pedestrian environment. The internal traffic layout and associated treatments have been designed having regard to DMURS. A road Safety Audit has been carried out by roadplan which concludes that the proposed development is in compliance with DMURS. The EIAR also contains a detailed traffic assessment of the potential impact of the proposed development on the existing surrounding road network.

The proposed development delivers key policy objectives of the Wexford Town & Environs Development Plan with regards to transport, specifically, Objective T8 and the potential third river crossing.

10.0 Implementation of SEA Directive (2001/42/EC) Assessment of the Effects of Certain Plans and Programmes on the Environment – Guidelines for Regional and Planning Authorities (2004)

A Natura Impact Statement (NIS) and an Environmental Impact Assessment Report (EIAR) have been prepared for the subject site.

11.0 Childcare Facilities – Guidelines for Planning Authorities (2001)

“Childcare facilities will be required in all new housing developments at a rate of one childcare facility providing for a minimum 20 childcare places for each 75 residential units and in accordance with the DOELG Planning Guidelines for Childcare Facilities 2001, the Childcare (Pre-School Services) Regulations 1996 and Guidelines for Best Practice in the Design of Childcare Facilities”.

It is proposed to provide crèche facilities on the ground floor of apartment block 2 and block 10. Both crèche facilities are designed to accommodate 30 children and have been designed in accordance with *“Guidelines for Best Practice in the Design of Childcare Facilities”* published by the Department of Children and Youth Affairs. Crèche A will be provided as part of phase 2 while crèche B will be constructed in phase 4.

The high number of Apartment Units throughout the development will result in a reduced demand for Child Care facilities. The number of child spaces required has been calculated by removing the one bed apartments and assuming 50% of the total number of 2 bed apartments and 100% of both the 3 and 4 bed units will generate the need for childcare facilities.

12.0 Code of Practice on the Provision of Schools and the Planning System (2008)

Under the “Program for Capital Investment in Schools” for the period 2016-2021 Wexford Town has recently seen significant investment in Secondary level education facilities. Developments such as the new Loreto Convent post primary school which is open since late 2018, and a new building at the CBS Secondary school have seen significant investment in modern facilities with expanded pupil numbers. Further new build facilities for the Wexford Educate Together primary school are also proposed over the plan period in addition to new primary and secondary facilities in Gorey and Enniscorthy.

13.0 Urban Development and Building Heights Guidelines for Planning Authorities (2018)

These guidelines are specifically orientated towards the appropriate increase in building heights at key transport nodes, in particular public transport nodes and urban centre in the interest of facilitating increased densities and promoting sustainable movement patterns. While published three years after the Wexford Town and Environs Development Plan, it is noted that many of its core principles are still reflected by the Development Plan. In particular, there are no established generic limits regarding building heights imposed by the Wexford Town and Environs Development Plan.

With regards to site specific development plan policies, there is a requirement to provide landmark buildings which has been achieved through increased building heights at key locations along the main arterial route through the site towards the proposed third bridge crossing point. Future public transport links are likely at this point where higher density development is proposed. A total of 7 apartment blocks are proposed ranging in height from 4-7 storeys. Apartments were considered the most sustainable approach to providing for increased densities.

Section 3.2 (Development Management Criteria) of the guidelines states *“In the event of making a planning application, the applicant shall demonstrate to the satisfaction of the Planning Authority/ An Bord Pleanála, that the proposed development satisfies the following criteria:”*

At the scale of the relevant city/town

- The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.
- Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views.
- Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.
- On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.

Response

The site has the potential to form a key public transport node and is located adjacent to a railway line. Given the context of the site i.e. brownfield, edge of centre, low-lying, riverside with little by means of existing surrounding development. The development proposal itself is afforded the opportunity to create character and public realm in addition to landmark structures. A full landscape character and visual impact assessment is included in chapter 10 of the EIAR.

At the scale of district/ neighbourhood/ street

- The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape
- The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.
- The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of “The Planning System and Flood Risk Management – Guidelines for Planning Authorities” (2009).
- The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.
- The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.

Response

The building heights are tapered rising from the river edge to the highest point to the rear of the site along the railway line. Similarly along the river edge buildings heights are varied to avoid repetition. A rising landscape to the rear of the development site frames the development when viewed from the opposite side of the river. A Site Specific Flood Risk Assessment accompanies the application.

At the scale of the site/building

- The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.
- Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment’s ‘Site Layout Planning for Daylight and Sunlight’ (2nd edition) or BS 8206-2: 2008 – ‘Lighting for Buildings – Part 2: Code of Practice for Daylighting’.
- Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.

Response

The proposed development has been designed to maximise solar potential and to provide the highest level of access to daylight. No unacceptable levels of overshadowing will occur.

Specific Assessments

To support proposals at some or all of these scales, specific assessments may be required and these may include:

- Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/ mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.
- In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.
- An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.
- An assessment that the proposal maintains safe air navigation.
- An urban design statement including, as appropriate, impact on the historic built environment.⁴
- Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.

Response

The proposed development does not include clusters of tall buildings and as such assessment of micro-climatic effects such as downdraft are not required. Potential interaction of the buildings with birds and bats are addressed in the EIAR. No negative effects are envisaged in this regards. An NIS is also included. No negative effects are envisaged on the adjacent Natura sites.

Section 3.4 of the Guidelines states the following:

Newer housing developments outside city and town centres and inner suburbs, i.e. the suburban edges of **towns and cities**, typically now include town-houses (2-3 storeys), duplexes (3-4 storeys) and apartments (4 storeys upwards). Such developments deliver medium densities, in the range of 35-50 dwellings per hectare net. Such developments also address the need for more 1 and 2 bedroom units in line with wider demographic and household formation trends, while at the same time providing for the larger 3, 4 or more bedroom homes across a variety of building typology and tenure options, enabling households to meet changing accommodation requirements over longer periods of time without necessitating relocation. These forms of developments set out above also benefit from using traditional construction methods, which can enhance viability as compared to larger apartment-only type projects.

The proposed development is in accordance with the above.

14.0 Quality Housing for Sustainable Communities – Design Guidelines (2007)

These guidelines identify the essential elements required for the provision of sustainable development for sustainable communities. The subject application is assessed against the main provisions identified by the guidelines as follows:

1 Socially and Environmentally Appropriate

The proposed development includes for a strong mix of dwelling type, sizes and design in order to encourage a socially sustainable neighbourhood. The proposal supports the policy objectives for the area. The site location is considered to be environmentally sustainable and represents the logical expansion of Wexford Town close to employment, recreation facilities and amenities. The proposed development includes high quality useable open spaces provided on a phase by phase basis to serve the needs of all

members of the community by being readily accessible and at a convenient distance from their home. The proposed development is therefore considered to be socially and environmentally appropriate.

2. Architecturally Appropriate

The scheme will provide for a pleasant living environment, which is aesthetically pleasing and human in scale. The design solution responds appropriately to its context in that the design response evolved over the scoping process of the EIAR thus facilitating site constraints through the design process rather than an active afterthought. Visually, in an urban design context the proposed development will “bookend” Wexford town when viewed on approach from the opposite side of the river. This is clearly highlighted and assessed by the visual impact assessment included in Chapter 10 of the EIAR.

3 Accessible and Adaptable

Ease of access and circulation for all residents, including people with impaired mobility, is ensured through compliance with Part M of the Building Regulations. All dwellings are capable of adaptation to meet the changing needs of residents during the course of their lifetime.

4 Safe, Secure and Healthy

The proposed development has been designed to maximise natural surveillance of all proposed areas of open space/amenity including public footpaths and parking areas. Cycle lanes are provided on main arterial routes while the core aspects of the principles for the provisions for home zones are employed to ensure pedestrian safety.

5 Affordable

The guidelines state the following:

“The scheme should be capable of being built, managed and maintained at reasonable cost, having regard to the nature of the development”.

The proposed development is consistent with this statement and Part V social and affordable housing shall be provided on a phased “per phase” basis.

6 Durable

The best available construction techniques will be used and key elements of construction will have a service life in the order of sixty years without the need for abnormal repair or replacement works.

7 Resource Efficient

The proposed site represents the logical expansion of Wexford town and will facilitate a third river crossing in addition to key elements of the council's inner relief road. The proposed has been designed to maximise the potential of the site in terms of density and general land use efficiency. The proposed development has been designed to consider the context of the site and to maximise solar gain.

All standards in Appendix i—iv of the guidelines have been achieved.

15.0 Draft Landscape and Landscape Assessment Guidelines (2000) and EPA's Guidelines on the Information to be Contained in Environmental Impact Statements, 2002

An Environmental Impact Assessment Report accompanies the planning application. The Draft guidelines provided the basis for the preparation of the EIAR.

16.0 Conclusion

The proposed development is consistent with the requirements of the Wexford Town and Environs Development Plan and as highlighted above, proper consideration has been given to the Section 28 Guidelines as issued by the Minister.
