



MATERIAL CONTRAVENTION STATEMENT

Proposed Strategic Housing Development
on Lands at Kilnahue & Gorey Hill,
Carnew Road & Kilnahue Lane,
Gorey, Co. Wexford

Applicant: Gerard Gannon Properties

March 2022

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D C W N E Y

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	Eva Bridgeman MIPI Director	13/01/2022	DRAFT_V02
	Eva Bridgeman MIPI Director	25/03/2022	FINAL_V03

1.0 INTRODUCTION

Downey, Chartered Town Planners, 29 Merrion Square, D02RW64, have prepared this Statement of Material Contravention, on behalf of the applicant, Gerard Gannon Properties. This Statement accompanies a planning application to An Bord Pleanála for a proposed Strategic Housing Development on lands at Kilnahue & Gorey Hill, Carnew Road & Kilnahue Lane, Gorey, Co. Wexford, which materially contravenes the Wexford County Development Plan 2013-2019 and Gorey Town and Environs Local Area Plan (LAP) 2017-2023. This Statement therefore seeks to provide justification for this material contravention.

This statement is being submitted having regard to section 8(1)(a)(iv) of the Planning and Development (Housing) and Residential Tenancies Act, 2016:

“8. (1)(a)(iv) Where the proposed development materially contravenes the said plan, other than in relation to the zoning of the land, indicating why permission should nonetheless, be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000.”

and section 37(2)(b) of the Planning and Development Act, 2000 (as amended) which read as follows:

“(2) (b) Where a planning authority has decided to refuse permission on the grounds that a proposed development materially contravenes the development plan, the Board may only grant permission in accordance with paragraph (a) where it considers that—

(i) the proposed development is of strategic or national importance,

(ii) there are conflicting objectives in the development plan or the objectives are not clearly stated, insofar as the proposed development is concerned, or

(iii) permission for the proposed development should be granted having regard to regional spatial and economic strategy for the area, guidelines under section 28, policy directives under section 29, the statutory obligations of any local authority in the area, and any relevant policy of the Government, the Minister or any Minister of the Government, or

(iv) permission for the proposed development should be granted having regard to the pattern of development, and permissions granted, in the area since the making of the development plan.”

It is respectfully requested that An Bord Pleanála have regard to the following justification for a material contravention of the Wexford County Development Plan 2013-2019 and the Gorey Town and Environs Local Area Plan 2017-2023. It is also respectfully requested that the Board have regard to the justification for the material contravention of specific objectives of the Development Plan and LAP in relation to car parking, the provision of a certain size and mix of dwellings typology and also private open space which is conflicting with the policies and objectives stated in the Section 28 Government Guidelines, particularly ‘Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009)’, ‘Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities’ (2020), the ‘Urban Development and Building Heights, Guidelines for Planning

Authorities, and the *'Project Ireland: National Planning Framework 2040'* aiming at a nationally determined apartment mix parameter as broad and consistent but also flexible safeguard.

The proposed development is also of strategic and national importance as there is a clear and urgent need for housing at a national level within Ireland and indeed that permission for the proposed development should be granted having regard to the pattern of development in the area.

Therefore, the proposed development should be considered by An Bord Pleanála even if the proposed development may contravene materially the Development Plan and LAP relating to the area.

2.0 POTENTIAL MATERIAL CONTRAVENTION

This section seeks to address the issue of potential material contraventions of the Wexford County Development Plan 2013-2019 and the Gorey Town & Environs Local Area Plan 2017-2023 in relation to unit size, unit mix, private amenity space, and car parking provision.

2.1 Unit Size, Unit Mix & Private Amenity Space

The Development Plan sets out standards for the provision of a certain minimum size for various house types within residential schemes. The standards are as follows for houses:

No of bedrooms	Minimum Overall size	Minimum main living room	Aggregate living area	Aggregate Bedroom Area	internal storage (excl loft)
2	80m ²	13m ²	30m ²	25m ²	4m ²
3	100m ²	15m ²	37m ²	36 m ²	5m ²
4	110m ²	15m ²	40m ²	43m ²	6m ²

Figure 1. Development Plan Table 36 Minimum Internal Space for Dwellings (Development Plan)

In relation to the apartments, the standards set by the Development Plan are as follows:

No of Bedrooms	Minimum total internal space	Minimum private open space/ balcony space (new build)
1 and 2	75m ²	7m ²
3	86m ²	9m ²
4	105m ²	11m ²

Figure 2. Development Plan Table 37 Minimum Standards for Apartments (Development Plan)

The Development Plan does however state that *'the Council will only consider exceptions to the target standards in exceptional circumstances where an otherwise high-quality design solution is proposed, which has full regard to the characteristics and context of the site'*.

Under 18.10.8 Private Open Space of the Development Plan, the Council also require 1 and 2 bed dwellings to have a minimum provision of 60m² useable private open space and 3, 4 and 5 bed dwellings to have a minimum provision of 75m² of useable private open space.

In considering the above in the context of the proposed development, not all units would meet the aforementioned minimum spaces, unit size or private amenity space standards as stipulated within the Development Plan, and therefore, the proposed development potentially materially contravenes the Development in this regard.

In addition, The Gorey Town & Environs Local Area Plan 2017-2023 sets out an objective for provision of a certain mix of house types within residential schemes so to cater for different household compositions. This objective is as follows: -

Objective H05 of the Gorey Town & Environs LAP seeks:

“To require residential schemes to provide an appropriate mix of house types that will cater for the various household compositions in the plan area. In general the following house type ratio will be required in residential schemes:

- 25% two bedroom dwellings,
- 30% three bedroom dwellings,
- 30% four bedroom dwellings, and
- 15% to be allocated to any of the above based on evidence of demand.

The Council will consider a deviation from this mix ratio where it is demonstrated that there is an overprovision of a particular type of house type or there is lack of demand for a particular house type(s) in the area.”

As illustrated, there is no allowance in Objective H05 for any one bed units and the flexibility threshold of 15% is solely defined to be distributed across 2- to 4-bedroom dwellings. The proposed mix of units within the proposed scheme would not be in compliance with the policies and objectives of the LAP as the proposed number of four-bedroom units is below the requirements stipulated, and the provision of one bed units is not provided for at all within the objective, and therefore, the proposed development potentially materially contravenes Objective H05 of the LAP.

However, the adherence of the foregoing Objective H05 of the Gorey Town & Environs LAP to an absolute dwelling mix ratio is suggested to contradict the flexible approach of the Development Plan, and National and Regional planning policy to cater for existing and changing population requirements in a given context.

Table 1. Unit Mix of Proposed Development

HOUSES	
3 Bedroom Units	115
4 Bedroom Units	18
DUPLEXES	
1 Bedroom Units	4
2 Bedroom Units	26
3 Bedroom Units	30
APARTMENTS	
1 Bedroom Units	76
2 Bedroom Units	145
3 Bedroom Units	7

In this instance, an average household size of 2.3 recorded for Gorey Town, and an existing and emerging need for smaller household sizes, as acknowledged in the National and Regional planning policy, Objective H05 of the Gorey Town & Environs LAP does not reference to one-bedroom dwellings within the provided mix ratio.

The breakdown of private household sizes of the area is demonstrated in the table below:

Table 2. Private Households in Gorey Urban & Rural ED's by Household Size, 2016

Size of household	Households	%
1-person Households	917	24.2
2-person Households	1,053	27.8
3-person Households	672	17.8
4-persons Households	678	17.9
5-person and over Households	462	12.2

The Development Plan does also allow deviation from the aforementioned mix ratio upon evidence-based justifications around housing demand and supply in the area, i.e., overprovision of a housing typology in the area, or emerging demand for a certain housing typology.

Outlined in the Wexford County Development Plan 2013-2019, *“the Housing Strategy identified that there will be a requirement for a greater mix of unit types due to increases in the number of single-person requiring accommodation.”* Also, the Development Plan allows for more flexibility in terms of provision for housing mix in developments of 10 or more houses.

Under **Objective HP15** of the Development Plan, it is an objective of the Council:

“To require all applications for residential development of 10 houses or more to contain a mix of house types. The mix of house types shall be appropriate to the needs identified”

where the scheme will be located. This will not apply where it can be demonstrated that there is a need for a particular type of unit and the proposed development meets this need.”

Under Section 28 (1C) of the Planning and Development Act 2000 (as amended), Planning Authorities and An Bord Pleanála are required to have regard to the guidelines and apply any specific planning policy requirements (SPPRs) of the guidelines in carrying out their function. SPPRs as stated in the Guidelines, take precedence over any conflicting policies and objectives of development plans, local area plans and strategic development zone planning schemes.

With regards to the dwelling mix, the Guidelines take a flexible approach encouraging provision for a greater mix of typologies. We note the following compliances with the Specific Planning Policy Requirements (SPPRs) of the Guidelines:

“It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.”*

The proposed development provides for a total of 421 no. residential units and offers a variety of unit mix in terms of size and type. In this regard, the proposed development consists of:

Table 3. Proposed Mix of Units Statistics

Unit Type	Percentage (%)
1 Bedroom dwellings	19.0
2 Bedroom dwellings	40.6
3 Bedroom dwellings	36.1
4 Bedroom dwellings	4.3

2.2 Car Parking

It is proposed to provide for a total of 759 no. car parking spaces to serve the overall development (i.e. residents, visitors, and drop-off). There are no specific car parking standards set out for duplexes within the Wexford County Development Plan 2013 – 2019. Therefore, for the purpose of calculation, the car parking standards for the apartments have been applied for the duplex apartment units and the standards for the houses have been applied for the duplex housing units. The current WCDP 2013-2019 also does not set out standards for visitor car parking spaces.

Applying the car parking standards set out in the Development Plan, the car parking required to serve the proposed development is 764 spaces, thus the reduced quantum of car parking proposed as part

of the overall scheme may be considered a material contravention of the Development Plan. For further information on the proposed car parking provision, please refer to TTA document prepared by Waterman Moylan Consulting Engineers.

3.0 MATERIAL CONTRAVENTION

As outlined above, the proposed development does not meet certain thresholds defined in the Wexford Development Plan and in the Gorey Town & Environs Local Area Plan. Section 4 of this Statement of Material Contravention provides justification for this deviation, suggesting the granting of permission for the development of the subject lands, on the grounds of emerging demand in Gorey Town as the context. This justification is based upon the requirements of Section 37(2) of the Planning and Development Act 2000 (as amended).

4.0 JUSTIFICATION

4.1 Section 37(2) of the Planning and Development Act 2000

As mentioned earlier, Section 37(2) of the Planning and Development Act 2000 (as amended) provides for An Board Pleanála to grant permission where the proposed development materially contravenes the development plan, subject to paragraph (b) where it considers:

(i) the proposed development is of strategic or national importance,

On determining that point (i) is applicable, it must be determined that one of the sub sections set out below is relevant.

(ii) there are conflicting objectives in the development plan or the objectives are not clearly stated, insofar as the proposed development is concerned, or

(iii) permission for the proposed development should be granted having regard to regional spatial and economic strategy for the area, guidelines under section 28, policy directives under section 29, the statutory obligations of any local authority in the area, and any relevant policy of the Government, the Minister or any Minister of the Government, or

(iv) permission for the proposed development should be granted having regard to the pattern of development, and permissions granted, in the area since the making of the development plan.

The following illustrates the strategic/national importance of the scheme, and thereafter, provides justifications with regards to the first two sub sections outlines above.

4.2 Demonstration of Strategic and/or National Significance of the Scheme

It is submitted that the proposed development is both of strategic and national importance. The significant shortfall in housing output to address current and projected demand is of national importance, with the latest publication of DoHLGH, Housing for All: A New Housing Plan for Ireland, outlining that Ireland's housing system is not meeting the needs of enough of our people, and therefore, it needs to increase new housing supply to an average of at least 33,000 new units per year

over the next decade. This will include over 10,000 social homes each year over the next five years, with 9,500 of these being new-builds, and an average of 6,000 affordable homes for purchase or rent.

There is a clear and urgent need for housing at a national level within Ireland, which is particularly prevalent within the larger cities and towns, including Gorey. This is acknowledged by the Government as well as planning authorities and other such bodies. The result of this crisis has been a significant change in planning policy and guidance, which seeks to increase the output of housing with a focus being on increased densities within appropriate urban locations and zoned and serviceable sites.

This current proposal offers the opportunity to bring forward 421 no. new housing units as well as a childcare facility, 2 no. community rooms and 2 no. retail units, and a large parkland.

Furthermore, the proposed scheme is being progressed through the Strategic Housing Development planning process which, in itself, confirms the strategic importance of the current application, in accordance with Section 37(2)(b)(i).

The proposed scheme's contribution to the National Planning Framework (NPF) National Strategic Outcome No. 1 in respect of delivering compact growth and urban regeneration specifically in this instance involving an efficient use of greenfield lands, within close proximity of the Gorey town centre, adjacent to public transport link and main access routes, further confirms the strategic nature of this development proposal. It is noted that the NPF sets a target for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns, and villages on infill and/or brownfield sites. The provision of residential-led mixed-use development on the subject site in this instance will therefore be in accordance with the NPF's target of 40% of new housing to be located within existing towns and for 50% of population growth to take place within Ireland's existing settlements, outside of the five larger cities. In light of this, Downey submit that this current proposed development is strategic in nature and therefore is of strategic national importance.

4.3 Application of Section 37(2)(b) Considerations to the Proposed Development

(ii) there are conflicting objectives in the development plan or the objectives are not clearly stated, insofar as the proposed development is concerned

As demonstrated in section 2.0, the Development Plan provides for more flexibility in terms of provision for housing mix in development of 10 or more houses. This is noted to be in line with the NPF approach to planning policies which suggests focussing on design-led and performance-based outcomes and RSES approach to cater for existing and changing population requirements based upon local-level evidence, rather than specifying absolute requirements, i.e., the Gorey Town & Environs LAP, has taken the opposite approach by specifying the dwelling mix ratio, which contravenes the national and county level planning policies, and also does not necessarily reflect the typologies of the live housing demand in the area.

In light of the above, it is submitted to the Board that there are conflicting objectives in the Gorey Town & Environs LAP and the County Development Plan with regards to the housing mix and the approach to provision.

(iii) permission for the proposed development should be granted having regard to regional spatial and economic strategy for the area, guidelines under section 28, policy directives under section 29, the statutory obligations of any local authority in the area, and any relevant policy of the Government, the Minister or any Minister of the Government, or

Since the adoption of the Wexford County Development Plan 2013-2019, there has been significant changes in planning policy, on foot of the publication of the NPF in 2018. The following sub-section demonstrates the proposed development's compliance with national and regional planning policy together with section 28 Ministerial Guidelines.

Project Ireland 2040: National Planning Framework

The NPF has a number of national policy objectives which are relevant to this application in terms of provision for an efficient housing mix, which would serve the emerging need in the context of the proposed development. These include the following:

National Policy Objective 13: *In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.*

National Policy Objective 33: *Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.*

Furthermore, the National Core Principles contained within the National Planning Framework set out the standards for the delivery of housing to be implemented over the period to 2040. The Core Principles are stated as the following:

- *Ensure a high standard quality of life to future residents as well as environmentally and socially sustainable housing and placemaking through integrated planning and consistently excellent design.*
- *Allow for choice in housing location, type, tenure and accommodation in responding to need.*
- *Prioritise the location of new housing provision in existing settlements as a means to maximising a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure.*
- *Tailor the scale and nature of future housing provision to the size and type of settlement where it is planned to be located.*
- *Integrate housing strategies where settlements straddle boundaries (county and/or regional).*
- *Utilise existing housing stock as a means to meeting future demand.*

In addition, Section 4.5 highlights that:

*In particular, general restrictions on building height or **universal standards for car parking or garden size may not be applicable in all circumstances in urban areas** and should be replaced by performance-based criteria appropriate to general location, e.g. city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc.*

While there are some deviations from the listed Objectives of the Development Plan and LAP, it is important to note that the proposed development is a high-quality scheme that generally exceeds the Development Plan requirements and standards, such as in terms of minimum floor areas so that any reduction in minimum private amenity space, is compensated for by other design measures, such as increased overall floor area within housing units.

With respect to the site location within the Gorey Rural Electoral Division (ED), in the immediate vicinity of Gorey Urban ED, these ED's are suggested to demonstrate the demographic context of the proposed development. Census 2016 results show that Gorey Urban & Rural ED's population stood at 10,446 in April 2016, which indicates an increase of 882 (8.5%) since the last Census in 2011. This is considerably higher than the growth rate experienced in the overall County, which demonstrates a growing demand for housing market in Gorey. It is noted that the population change in urban and rural ED's did not necessarily increase at the same rate. As illustrated in the Table below, the Gorey Rural ED had the greater share of the population growth in the overall Gorey Urban and Rural ED's, increasing with a rate of 11.6% to 6,876 in 2016. This is also indicative of spatial distribution of Gorey's growing housing demand.

With an average household size of 2.7, there were 3,782 private households in Gorey Urban & Rural ED's in 2016. As shown in the Table below, nearly 70% of the households residing in this area in 2016 were small sized households ranging from 1- to 3-person households (2,624 households). It is noted that the average household size in the Gorey Urban ED stood at 2.3, while this is recorded as 2.9 for the Gorey Rural ED in 2016.

Table 4. Private Households in Gorey Urban & Rural ED's by Household Size, 2016

Size of household	Households	%
1-person Households	917	24.2
2-person Households	1,053	27.8
3-person Households	672	17.8
4-persons Households	678	17.9
5-person and over Households	462	12.2
Total	3,782	-

Source: CSO StatBank

The spatial distribution of single person households in Gorey as per the most recent Census, as shown on the Figure below, indicates that moving outward from the Gorey town centre, there is an increase in the smaller sized households.

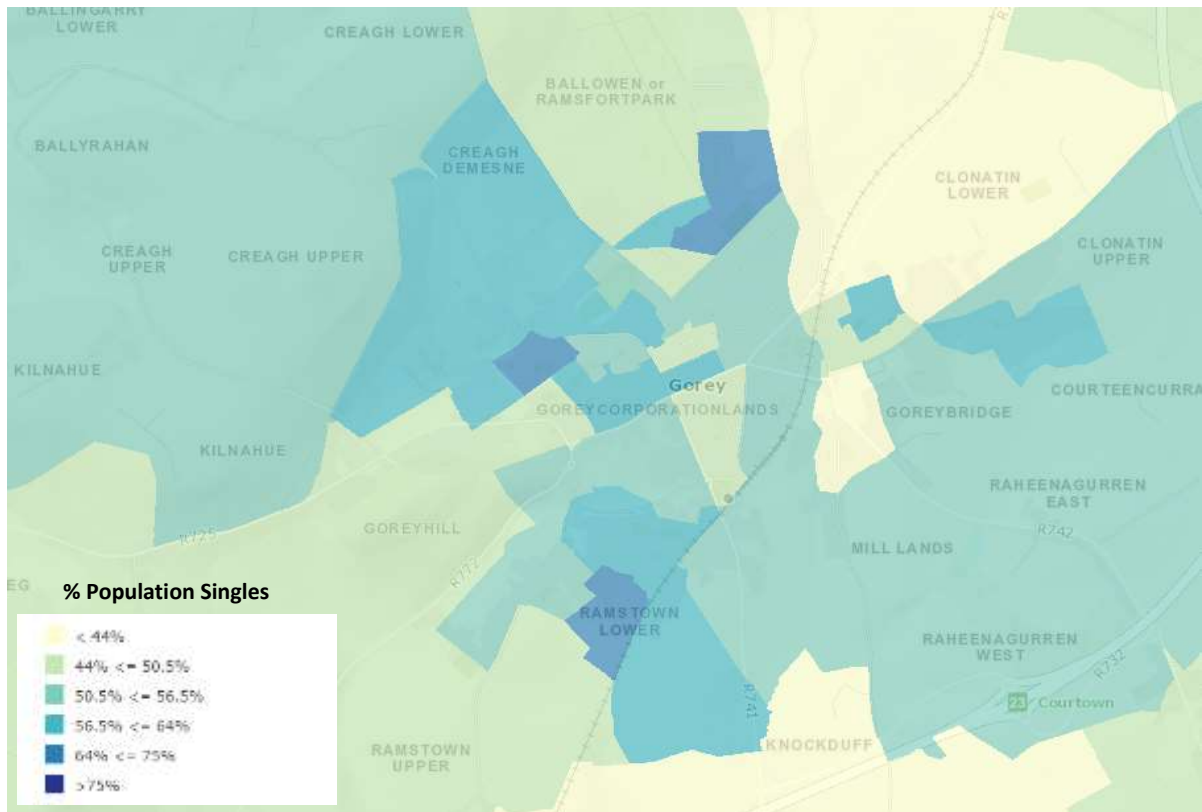


Figure 3. Spatial Distribution of Single-person Households - Census 2016

On the other hand, spatial distribution of the apartments/flats in Census 2016 compared with the Figure above, illustrates that there is an existing need for apartments and smaller sized dwellings in the outskirts of Gorey town.

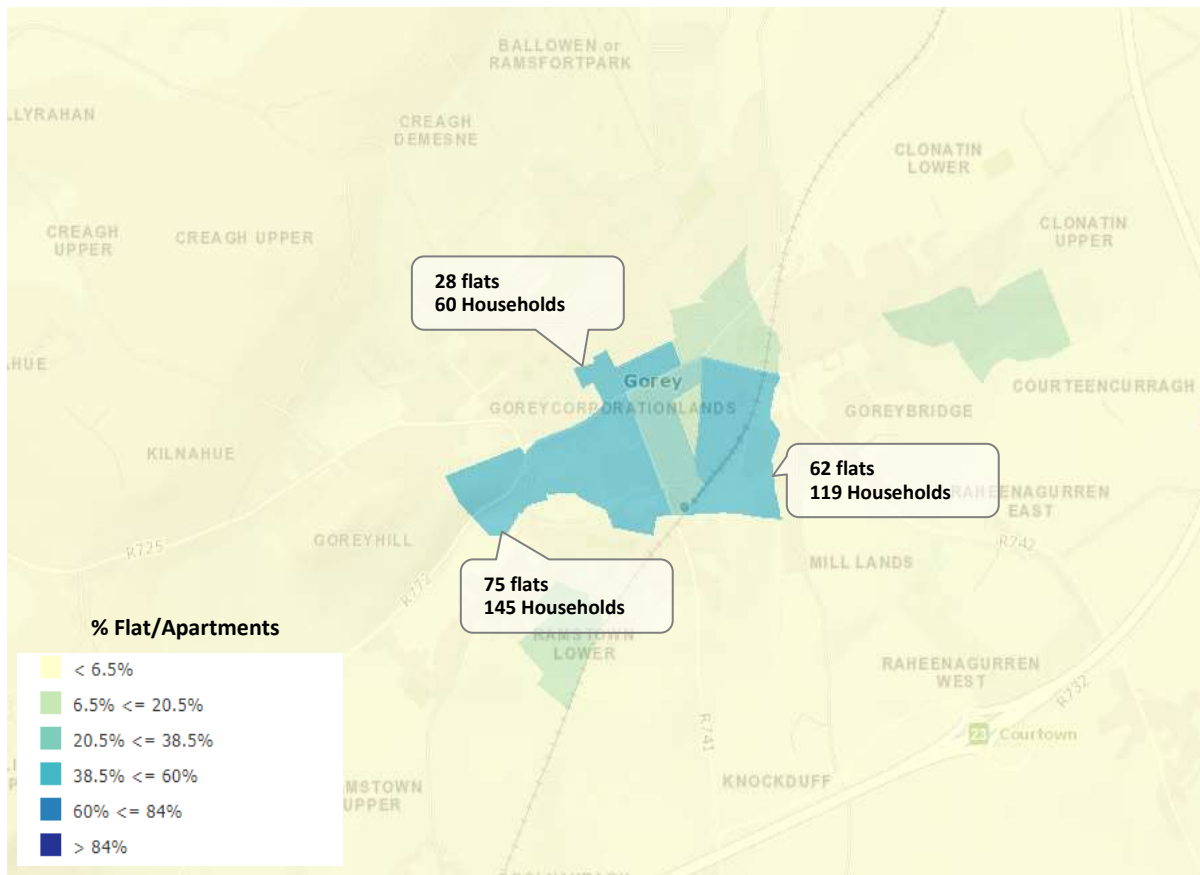


Figure 4. Spatial Distribution of the Flats/Apartments in Gorey Town - Census 2016

With regards to the national and strategic planning framework and the evidence driven from the demographic characteristics of the area in the most recent Census, it is envisaged that all future residential developments will be required to provide multiple housing and accommodation types in order to meet the challenges of providing for an increasing population where the composition of households is to be comprised of smaller family units and an increased age dependent population are both expected to grow by 2040.

Downey are of the considered opinion that the proposed residential development adheres to the objectives and core principles of the National Planning Framework, and by taking an evidence-based approach towards existing and expected housing demand in the area, will provide multiple dwelling types for a full range of housing needs. Furthermore, with respect to the recorded average household size of 2.3 for Gorey Town, it is submitted that the proposed dwelling mix would be a better fit for the area.

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

The Guidelines are intended to set out a suite of measures and policy shifts nationwide to break the current development patterns in Irish cities and towns and create more compact and integrated communities. With regards to the dwelling mix, the Guidelines take a flexible approach encouraging provision for a greater mix of typologies. We note the following compliances with the Specific Planning Policy Requirements (SPPRs) of the Guidelines:

“It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:

- 1. the minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended), titled “Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;*
- 2. a greater mix of building heights and typologies in planning for the future development of suburban locations; and*
- 3. avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.”*

It is envisaged that all future residential developments will be required to provide multiple housing and accommodation types in order to meet the challenges of providing for an increasing population where the composition of households is to be comprised of smaller family units and an increased age dependent population are both expected to grow by 2040. Downey are of the considered opinion that the proposed residential development adheres to the objectives and core principles of the National Planning Framework and will provide multiple accommodation types for a rather full range of housing needs.

Out of the total 421 no. residential units proposed, 228 no. apartments and 60 no. duplex units are to be delivered as part of the development.

Regional Spatial & Economic Strategy for the Southern Region

Setting out the long-term regional level strategic planning and economic framework in support of the National Planning Framework for the period 2019-2031, the RSES is tasked with the development of planning policy for future housing needs in the region. Outlined in the RSES, housing will be required to cater for existing and changing population requirements, such as social and affordable housing, student housing, renewal/upgrade and replacement of existing stock, smaller families, an ageing population, and that adult children are living at home longer, with resultant requirements for additional housing responses.

Accordingly, the mix of housing demand is changing dramatically which will need targeted policy intervention to cater for 1-2 person households and the needs of an aging population. Therefore, there is a need to diversify the housing mix and typologies within the Region using an evidence-based approach at local level. Under the NPF a ‘Housing Need Demand Assessment’ (HNDA) is to be undertaken for each local authority area to correlate and accurately align future housing requirements.

As outlined earlier, the investigation of average household size in Gorey Town in Census 2016, and the spatial distribution of smaller sized households and flats/apartments within Gorey demonstrate that the proposed scheme would better meet the existing and expected housing demand in the area.

Sustainable Urban Housing: Design Standard for New Apartments 2020

In December 2020, a revised version of the document “Sustainable Urban Housing: Design Standard for New Apartments” was released. The parking standards set out in this document are considerably lower than those contained in the Wexford County Development Plan 2013 – 2019 in respect to apartment developments.

As per the definitions contained in that document, the proposed development is located in a peripheral and/or less accessible urban location. Based on that, the following extract from the “Design Standards for New Apartments” summarises the guidelines for parking relevant to the proposed development. *“Peripheral and/or Less Accessible Urban Locations: As a benchmark guideline for apartments in relatively peripheral or less accessible urban locations, one car parking space per unit, together with an element of visitor parking, such as one space for every 3-4 apartments, should generally be required.”*

Applying the car parking standards set out in the Development Plan, the car parking required to serve the proposed development is 764 spaces, thus the reduced quantum of car parking proposed as part of the overall scheme (759 spaces) may be considered a material contravention of the Development Plan but seeks to reduce car parking provision at the subject site whilst considering the requirements of the Development Plan and indeed the site’s location and context.

5.0 PATTERN OF DEVELOPMENT IN GOREY

As illustrated in the Table below, there has been a sustained rise in the number of residential units completed since 2013, as the year of adopting the Wexford Development Plan. This increasing historical trend indicates a growth rate of 259.2% over 2013-2020, which shows a steady demand for the housing market in Gorey.

Table 5. Unit Completion in Gorey over 2013-2020

Year	2013	2014	2015	2016	2017	2018	2019	2020
Unit Completion	49	52	78	82	123	145	170	176

Source: CSO StatBank

Therefore, with respect to this existing strong market for housing in Gorey, it is submitted that the proposed development is also consistent with the demand in the area and considered to be an appropriate response to the increasing demand for housing, as also being acknowledged in the recently published Housing for All document.

6.0 CONCLUSION

It is respectfully submitted that the justification set out within this statement clearly demonstrates that the proposed Strategic Housing Development at Kilnahue & Gorey Hill, Carnew Road & Kilnahue Lane, Gorey, Co. Wexford, should be considered for the proposed dwelling size, mix ratio, amenity space and car parking in the context of the national and regional planning policy, and the evidence driven from the demographic characteristics and housing provision at a local level. Such justification includes:

- Objective H05 of the Gorey Town & Environs LAP, which requires adherence to an absolute dwelling mix ratio in development of 10 or more houses, contradicts the flexible approach of the Development Plan, National, and Regional policy to cater for existing and changing population requirements in a given context;
- Minimum requirements for unit size and private amenity space contradicts the flexible approach of the National and Regional policy to cater for existing and changing population requirements in a given context and setting;
- Despite an average household size of 2.3 recorded for Gorey Town, and an existing and emerging need for smaller household sizes, as acknowledged in the National and Regional planning policy, Objective H05 of the Gorey Town & Environs LAP does not reference to one-bedroom dwellings within the provided mix ratio.
- While there are some deviations from the listed Objectives of the Development Plan and LAP, it is important to note that the proposed development is a high-quality scheme that generally exceeds the Development Plan requirements and standards, such as in terms of minimum floor areas such that any reduction in one standard, i.e. minimum private amenity space, is compensated for by other design measures, such as increased overall floor area.

In light of the foregoing, it is respectfully requested that An Bord Pleanála have regard to the justification set out within this statement and permit the potential material contravention of the Wexford Development Plan 2013-2019 and the Gorey Town & Environs Local Area Plan 2017-2023, having consideration to section 37(2)(b)(i) and (iii) of the Planning and Development Act, 2000 (as amended), specifically the conflicting objectives within Wexford County Development Plan 2013-2019 insofar as the proposed development is concerned, the policies and objectives set out within the Section 28 Guidelines and noting the national importance of delivering housing given the current housing crisis.